



Uttlesford District Council

Chief Executive: Dawn French

Planning Policy Working Group

Date: Thursday, 10th January, 2019
Time: 5.30 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, E Oliver and V Ranger

Public Speaking

At the start of the meeting there will be an opportunity of up to 15 minutes for members of the public to ask questions and make statements subject to having given notice by 2pm on the day before the meeting.

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 - 10
To consider the minutes of the previous meeting.
- 3 Local Plan – Updated Sustainability Appraisal** 11 - 536
To consider the Local Plan – Update Sustainability Appraisal.
- 4 Local Plan – Representations update** 537 - 874
To consider the Local Plan – representations update.

5 Any Other Item Which the Chairman Considers to be Urgent

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

MEETINGS AND THE PUBLIC

Agendas, reports and minutes for this meeting can be viewed on the Council's website www.uttlesford.gov.uk. For background papers in relation to this meeting please contact committee@uttlesford.gov.uk or phone 01799 510369/433.

Members of the public who have registered to do so are permitted to speak at this meeting, to a maximum number of five speakers in relation to each main agenda item. A maximum of 3 minutes is permitted for members of the public to speak. You will need to register with the Democratic Services Officer by 2pm on the day before the meeting. Late requests to speak may not be allowed. You may only speak on the item indicated.

Agenda and Minutes are available in alternative formats and/or languages. For more information please call 01799 510510.

Facilities for people with disabilities

The Council Offices has facilities for wheelchair users, including lifts and toilets. The Council Chamber has an induction loop so that those who have hearing difficulties can hear the debate. If you are deaf or have impaired hearing and would like a signer available at a meeting, please contact committee@uttlesford.gov.uk or phone 01799 510369 as soon as possible prior to the meeting.

Fire/emergency evacuation procedure

If the fire alarm sounds continuously, or if you are instructed to do so, you must leave the building by the nearest designated fire exit. You will be directed to the nearest exit by a designated officer. It is vital you follow their instructions.

For information about this meeting please contact Democratic Services

Telephone: 01799 510369 or 510548

Email: Committee@uttlesford.gov.uk

General Enquiries

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

Telephone: 01799 510510

Fax: 01799 510550

Email: uconnect@uttlesford.gov.uk

Website: www.uttlesford.gov.uk

**PLANNING POLICY WORKING GROUP held at COUNCIL CHAMBER -
COUNCIL OFFICES, LONDON ROAD, SAFFRON WALDEN, CB11 4ER, on
TUESDAY, 20 NOVEMBER 2018 at 5.30 pm**

Present: Councillor H Rolfe (Chairman)
Councillors S Barker, P Davies, A Dean, P Lees, J Lodge,
J Loughlin, E Oliver and V Ranger

Officers in attendance: A Bochel (Democratic Services Officer), G Glenday (Assistant
Director - Planning), R Harborough (Director - Public Services)
and S Miles (Planning Policy Team Leader)

Public speakers: D Hall, M Herbert, K McDonald and F Wilkinson

PP25 APOLOGIES FOR ABSENCE AND DECLARATIONS OF INTEREST

Councillor Barker declared a personal interest as a County Councillor for Great Dunmow.

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

PP26 MINUTES OF THE PREVIOUS MEETING

The minutes of the meeting held on 4 October were received and signed by the Chairman as a correct record subject to the following amendment:

PP23: 'Councillor Ranger said it would be **irresponsible** to juggle with mathematics to equate figures for care home spaces with those for homes' to be changed to 'Councillor Ranger said it would be **immoral** to juggle with mathematics to equate figures for care home spaces with those for homes'

PP27 GARDEN COMMUNITY STRATEGIC GROWTH DEVELOPMENT PLAN DOCUMENTS

In response to a statement from M Herbert, the Planning Policy Team Leader said the housing trajectory was not a definitive plan of when building would happen, but an estimate of when it was most likely to happen. There was the potential for building to happen at a faster pace, and the Local Plan did not prevent this in the infrastructure and other requirements policy were met.

The Planning Policy Team Leader gave a summary of the report.

Councillor Barker noted that parking standards was a very important issue to areas such as Great Dunmow. Parking restrictions were an even more important

requirement. The Planning Policy Team Leader said many of these criteria were already covered in the Essex Design Guide.

Members noted they had been impressed with the waste system in Eddington. There were no wheelie bins, and instead waste was stored underground. While this sort of system could not be retrofitted, it could be introduced in new garden communities.

Councillor Dean said it was essential that the majority of the Council's dialogue with the community was face to face, and that all ideas that came about from this engagement were logged by officers.

Councillor Ranger said the Development Plan Documents (DPDs) should specify space standards for dwellings. Dwellings would need to be adaptable for those living in them.

Councillor Lees said the Essex Design Guide for parking standards had been followed in places such as Foresthall, Dunmow and Elsenham, and all still had problems with parking. It would be good if the Council could be more innovative here.

Councillor Lodge said landowners still stood to walk away with £2 billion from the Local Plan. The Council should look further into the idea of setting up development corporations.

The Chairman said development corporations were complicated. The delivery of the new communities was a matter for the Garden Communities Member Governance Board to consider. The Development Plan Documents were being started now as they were fundamental to the planning of these new communities.

M Herbert spoke on this item. A copy of his statement is appended to these minutes.

PP28 **LOCAL PLAN STATEMENT OF COMMUNITY INVOLVEMENT**

The Planning Policy Team Leader gave a summary of the report.

Members asked that the Statement of Community Involvement express the importance of the Development Plan Documents. The Planning Policy Team Leader said he would bring ideas about these changes to Cabinet.

Members said community engagement was very important. Interaction between Uttlesford District Council, the community and the developers was key.

Members asked for further elaboration on the need for engagement on s106 agreements with town and parish councils.

RESOLVED to recommend to Cabinet that the Local Plan Statement of Community Involvement is subject to a six week consultation between 7 January and 18 February.

PP29 **REVIEW OF REGULATION 19 SUSTAINABILITY APPRAISAL**

In response to statements from members of the public, the Chairman said reviewing the Council's sustainability appraisal had been the responsible thing to do, after the company that had completed the appraisal, Place Services, had an appraisal it completed on behalf of North Essex authorities criticised by an Inspector. The Chairman noted that the Regulation 19 local plan consultation was purely an opportunity to make representations. Comments submitted would not be responded to by the Council, but instead would be sent to the Inspector.

The Planning Policy Team Leader gave a summary of the report. He said the updated sustainability appraisal would not require the Council to relook at the homes and jobs forecast or to produce a new evidence base. The appraisal would examine the existing evidence. If the appraisal did identify that the Council's current strategy was appropriate, it would be able to be sent out for representations without another consultation on the local plan before it was submitted to the Planning Inspectorate by 24 January. AECOM, which was working on the Council's updated sustainability appraisal, had said the appraisal could be completed before the plan was programmed for submission.. In response to a member question, the Planning Policy Team Leader said he would request a project plan from AECOM.

In response to a Member question, the Director – Public Services said it was part of the Council's processes for officers to undertake testing and strengthening of the evidence base to support its examination once Council had passed the resolution to approve the submission of the local plan.

The Chairman said that officers had asked for a more fundamental, rather than light-touch, update of the sustainability appraisal. This was identified as a modification of option 3 in the report.

In response to a Member question, the Director – Public Services said officers would seek legal advice as to whether it would be appropriate to release counsel's opinion on approaches to strengthening of the sustainability appraisal.

Members noted that the Council did not start off with an overall vision of how the local plan would look, and instead took an approach of seeking out various ideas for where development would take place. This was something that the North Essex Garden Communities group had received criticism from the Inspector for.

The Director – Public Services said his interpretation of the AECOM report was that it said that the regulation 19 sustainability appraisal report had been considered separately from the quantum of development and the distribution of development. However, while the report gave that impression, in each iteration of the plan, the quantum of development changed and alongside this the

development strategy was reviewed each time. His view was that the problem lay in the adequacy of the explanation.

Councillor Ranger noted that 'consultation' had been wrongly used in the paragraph on option 3 of AECOM's report, on page 86 of the agenda document. The Director – Public Services confirmed this should instead say 'representation'.

In response to a member question, the Director – Public Services said that now the Stansted Airport planning application had been approved by the Planning Committee, the Inspector examining the submitted plan would need to decide whether the plan should be modified to reflect the council's new position on the limits to airport activity.

The Chairman confirmed the working group would see the updated sustainability appraisal.

K McDonald, F Wilkinson and D Hall spoke on this item. Copies of their statements are appended to these minutes.

The meeting finished 18.45.

PP30

ACTION POINTS

PP27	Remove the question mark next to parking standards on Page 16 of the agenda pack.
PP27	Consider not using the Essex Design Guide in relation to parking standards in the DPDs.
PP27	Ensure much of the engagement with the community takes place face to face, with a means of logging all ideas raised.
PP27	Include space standards for dwellings in the Development Plan Documents.
PP28	Include within the SCI more information on DPDs and their important role in the consultation on garden communities.
PP28	Include within the SCI a point about the need for engagement with town and parish councils on s106 agreements before a decision has been made.
PP29	Request a project plan from AECOM regarding their work on the updated sustainability appraisal.
PP29	Subject to legal advice, circulate counsel's opinion relating the update of the sustainability appraisal.
PP29	Circulate the updated appraisal to PPWG.

This page is intentionally left blank

Agenda Item 3

Committee:	Planning Policy Working Group	Date:	10 January 2019
Title:	Local Plan – Updated Sustainability Appraisal		
Report Author:	Stephen Miles, Planning Policy Team Leader, 346	Item for decision:	No

Summary

1. An updated Sustainability Appraisal (SA) of the regulation 19 Local Plan has been produced.

Recommendations

2. That Planning Policy Working Group considers the updated Sustainability Appraisal before it is published for a representation period.

Financial Implications

3. The costs associated with the updated SA can be met from the Local Plan forecasted spend for 2018/19. Officers considered not updating the SA or updating it with a 'light touch', in light of the findings of the SA review, however officers are of the view that more significant updating is appropriate.

Background Papers

4. The [SA review](#) published in November.

Impact

- 5.

Communication/Consultation	The updated SA will be published for a representation period.
Community Safety	N/a
Equalities	N/a
Health and Safety	N/a
Human Rights/Legal Implications	The SA is a legal requirement of producing a Local Plan, and the SA will be tested at examination.
Sustainability	The SA compares the strategy in the Local Plan to reasonable alternatives and assesses these against sustainability objectives.

Ward-specific impacts	All
Workforce/Workplace	N/a

Situation

6. In November a review into the SA was published, this identified a number of concerns with the SA of the Regulation 19 Local Plan, as well as identifying three options for addressing these concerns. At the PPWG in November officers explained that consultants had been commissioned to undertake a more fundamental update of the SA.
7. The Council has now received the updated SA, this document indicates that the strategy in the draft Local Plan is the most appropriate to deliver its objectives, when considered against reasonable alternatives.
8. This means that the updated SA will be published for a period of representations, from 14 January for six weeks. In the meantime the Local Plan will be submitted to the Secretary of State along with the supporting information (including the updated SA).
9. The representations to the updated SA received during the period commencing 14 January will be submitted to the Secretary of State following the close of the representation period.

Risk Analysis

10.

Risk	Likelihood	Impact	Mitigating actions
The SA supporting the Local Plan is not considered adequate by the Planning Inspector	2 – The SA conducted by Place Services for the North Essex Authorities was found to be inadequate	3 – Depending on the view of the Inspector, the SA would need to be reviewed, resulting in a delay to the examination	Officers commissioned an independent SA, which identified that the council had selected the most appropriate strategy

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.

Sustainability Appraisal (SA) for the Uttlesford District Council Local Plan

SA Report

December 2018

Quality information

Prepared by	Checked by	Verified by	Approved by
Cheryl Beattie Environmental Planner	Alastair Peattie Associate Director	Steve Smith Technical Director	Steve Smith Technical Director
Rosie Cox Assistant Consultant			
Alastair Peattie Associate Director			

Revision history

Revision	Revision date	Details	Name	Position
v1	05 December 2018	Draft for internal review	Alastair Peattie	Associate Director
v2	10 December 2018	Draft for client review	Alastair Peattie	Associate Director
v3	13 December 2018	Final Draft for review	Alastair Peattie	Associate Director
v4	17 December 2018	Final for consultation	Alastair Peattie	Associate Director

Prepared for:

Uttlesford District Council

Prepared by:

AECOM Limited
3rd Floor, Portwall Place
Portwall Lane
Bristol BS1 6NA
United Kingdom

T: +44 117 901 7000
aecom.com

© 2018 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited ("AECOM") for sole use of our client (the "Client") in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. No third party may rely upon this document without the prior and express written agreement of AECOM.

THIS PAGE IS INTENTIONALLY LEFT BLANK

Table of Contents

1.	Introduction.....	1
	SA explained	1
	This SA Report	1
2.	What is the plan seeking to achieve?.....	2
	Overview.....	2
	Plan vision and objectives	2
	What is the Local Plan not seeking to achieve?	3
3.	What is the scope of the SA?	4
	Introduction.....	4
	Consultation on the scope.....	4
	Key issues/ objectives	4
Part 1: What has plan-making/ SA involved up to this point?.....		12
4.	Introduction (to Part 1).....	13
5.	Regulation 18 Issues and Options 2015	15
6.	Regulation 18 (Draft) Local Plan 2017	25
7.	Regulation 19 Local Plan and Focussed Changes 2018	51
8.	Regulation 22 Submission Local Plan 2018/19.....	63
	Introduction.....	63
	‘Top-down’ considerations	64
	‘Bottom-up’ considerations	65
	Establishing the Reasonable Alternatives	101
	Appraisal of the Reasonable Alternatives	108
	Developing the preferred approach.....	112
Part 2: What are the SA findings at this current stage?.....		113
9.	Introduction (to Part 2).....	114
	Methodology	114
	Adding structure to the appraisal	115
10.	Appraisal of the Local Plan.....	116
	Introduction.....	116
Part 3: What are the next steps?		153
11.	Next steps.....	154
	Introduction (to Part 3).....	154
	Plan finalisation	154
	Monitoring.....	154
Appendices		156
	Appendix I: Regulatory requirements.....	157
	Appendix II: Scoping information	161
	Appendix III: SA of the Issues and Options 2015	177
	Appendix IV: Site options	238
	Appendix V: SA of reasonable alternatives	392

THIS PAGE IS INTENTIONALLY LEFT BLANK

1. Introduction

- 1.1 AECOM is commissioned to provide support for the Sustainability Appraisal (SA) of the emerging Uttlesford District Local Plan. SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of Local Plans is a legal requirement.¹

SA explained

- 1.2 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which transposed into national law EU Directive 2001/42/EC on Strategic Environmental Assessment (SEA).²
- 1.3 In-line with the Regulations, a report (known as the SA Report) must be published for consultation alongside the Draft Plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'.³ The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.4 More specifically, the SA Report must answer the following three questions:
1. What has Plan-making / SA involved up to this point?
 - Including in relation to 'reasonable alternatives'.
 2. What are the SA findings at this stage?
 - i.e. in relation to the Draft Plan.
 3. What happens next?
 - What steps will be taken to finalise (and monitor) the plan?

This SA Report

- 1.5 The Council is preparing to submit the Local Plan to the Secretary of State for examination in public, in-line with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This Submission SA Report is being published on the Council's website to allow representations to be submitted. The submission of the Local Plan will occur during this representation period, any comments received on the SA Report will be submitted following the end of the consultation period.
- 1.6 This SA Report answers the questions set out above in turn. However, prior to this it answers two initial questions in order to further 'set the scene': i) What is the plan trying to achieve?; and ii) What is the scope of the SA?

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (2012). The Town and Country Planning (Local Planning) (England) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document.

² The SA process incorporates the SEA process. Indeed, SA and SEA are one and the same process, differing only in terms of substantive focus. SA has an equal focus on all three 'pillars' of sustainable development (environment, social and economic).

³ Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004

2. What is the plan seeking to achieve?

Overview

- 2.1 Once adopted, the Uttlesford District Local Plan will set out the proposed strategy for meeting the district's needs in the period up to 2033, and will replace the currently adopted Uttlesford Local Plan (2005).
- 2.2 The Plan will set out:
- the Council's vision and objectives for the district's development over the plan period;
 - policies to ensure that development delivers high quality, sustainable homes, drive the quality of design and maintains the high quality built and natural environment;
 - the future distribution for housing growth and requirements for affordable housing;
 - policies to build a strong, competitive economy and the future distribution for new employment land space and thus new jobs;
 - policies to maintain and enhance the vibrancy and vitality of towns centres;
 - policies to support a sustainable transport and road infrastructure network; and
 - policies to identify the infrastructure requirements necessary to support the site allocations and other proposals.
- 2.3 The Plan will shape how the district changes, and what is protected, by attracting and guiding investment in the district from the private sector, the Council itself, and other public bodies. Such investment will include new homes, new employment opportunities, educational development, and retail development, as well as improvements to existing physical and green infrastructure. It will guide decision making on planning applications to build or change the use of buildings and land. It will also provide the strategic policies that form the context for any neighbourhood plans produced in the district.

Plan vision and objectives

- 2.4 The vision for the district is as follows:
1. By 2033, Uttlesford will continue to be one of the most desirable places to live and work in the UK.
 2. Uttlesford will be a place where residents choose to live, where communities thrive, are healthy and safe, jobs and services are well connected, places have character and communities create and feel a 'pride of place'. A district of communities where the quality of life is high will be achieved by harnessing the benefits of new smart technology and promoting a healthy, safe and secure environment, with well-designed new development, sufficient housing and jobs with a good range of facilities.
 3. The diversity and quality of Uttlesford's countryside and natural environment will be safeguarded and the historic environment conserved and enhanced. There will be better access to the countryside and green spaces for local communities which will improve people's quality of life and health. The challenges presented by climate change will have been embraced, with new development being located and designed to minimise resource and energy use and reduce the risk of flooding.
 4. New development will be focused on the towns and larger villages with three new garden communities being built within the district. West of Braintree – jointly planned with Braintree District Council; Easton Park and North Uttlesford Garden Communities. These new garden communities will be exemplars of 21st Century living providing well designed homes, high quality employment, services and facilities to meet the needs of residents and businesses. The new communities will be designed to support a high quality of life for all and create healthy, safe and vibrant places for living and working.

5. New housing will have responded to local needs with a range of different types, sizes and tenures of houses with a significant proportion being affordable. Housing will be of high quality, with excellent accessibility and well designed for whole life living, ensuring that the distinctive character of the district's towns and villages will be maintained and enhanced. This will have been supported by extensive community engagement and the production of Neighbourhood Plans.
 6. The district will continue to thrive as a successful balanced local economy. The vitality and viability of the towns and villages will be maintained and enhanced and they will be safe, clean and attractive places. Facilities will allow new businesses to thrive, especially in the research and development sectors, and in the tourism sector. London Stansted Airport will form a pivotal part of the highly successful London Stansted Cambridge Corridor; the environmental impact of London Stansted Airport will be effectively managed.
 7. Necessary infrastructure, community facilities and services will be in place to support growth. High-speed reliable broadband will be accessible for all homes and businesses.
 8. There will be convenient, comfortable, safe and affordable environmentally sustainable alternatives to the use of the car, with improvements to strategic transport routes providing fast and reliable connections to London, London Stansted Airport, Cambridge and beyond.
- 2.5 The Plan objectives are identified under three different themes as follows:
- Theme 1 – Promote Thriving, Safe and Healthy Communities
 - Objective 1a: meeting the need for new homes
 - Objective 1b: protecting and supporting rural communities
 - Objective 1c: thriving safe communities
 - Objective 1d: infrastructure
 - Objective 1e: high quality design
 - Theme 2 – Support Sustainable Business Growth
 - Objective 2a: enabling growth and investment
 - Objective 2b: supporting the Market Towns
 - Objective 2c: London Stansted Airport
 - Theme 3 – Protect and Enhance Heritage and Character
 - Objective 3a: safeguarding Uttlesford's distinctive character and environment
 - Objective 3b: climate change and use of resources

What is the Local Plan not seeking to achieve?

- 2.6 It is important to emphasise that the plan will be strategic in nature. Even the allocation of sites/ establishment of site-specific policy through this plan should also be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues (in the knowledge that they can be addressed at the planning application stage). The strategic nature of the Local Plan is reflected in the scope of the SA.

3. What is the scope of the SA?

Introduction

- 3.1 The aim here is to introduce the reader to the scope of the SA, i.e. the sustainability issues/objectives that should be a focus of (and provide a broad methodological framework for) SA.
- 3.2 Further information on the scope of the SA - i.e. a more detailed review of sustainability issues/objectives as highlighted through a review of the sustainability 'context' and 'baseline' - is presented in **Appendix II**.

Consultation on the scope

- 3.3 The Environmental Assessment of Plans and Programmes Regulations 2004 require that "When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies". In England, the consultation bodies are the Environment Agency, Historic England and Natural England.⁴ As such, these authorities were consulted on the SA scope in July and September 2015.

Key issues/ objectives

- 3.4 **Table 3.1** presents the key issues and 15 sustainability objectives that were established through SA scoping, i.e. in light of context/baseline review and consultation.
- 3.5 Taken together, the sustainability objectives and key questions, presented in **Table 3.1**, provide a methodological 'framework' for undertaking appraisal.

⁴ In accordance with Article 6(3), of the SEA Directive, these consultation bodies were selected because 'by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.'

Table 3.1: The SA framework

SA Objective	Sustainability issue(s)	Key questions – strategy and policy	Potential indicators
1) To conserve and enhance biodiversity (habitats, species and ecosystems) within the District	<ul style="list-style-type: none"> ▪ Conservation and protection of nationally and locally important designated sites ▪ Condition of some of the SSSIs ▪ Sensitivity of water environment to physical change 	<ul style="list-style-type: none"> ▪ Will it conserve and enhance natural/semi natural habitats? ▪ Will it conserve and enhance species diversity, and in particular avoid harm to indigenous BAP priority species? ▪ Will it maintain and enhance sites designated for their nature conservation interest? ▪ Will it maintain and enhance the connectivity of habitats and their ability to deliver ecosystem services e.g. flood risk management, climate change mitigation & adaptation and access for health? ▪ Will there be any impacts on the water environment as a result of hydromorphological changes and vice versa? 	<ul style="list-style-type: none"> ▪ Spatial extent of designated sites within the District ▪ Achievement of Biodiversity Action Plan targets ▪ Ecological potential assessments Distance from site to nearest: <ul style="list-style-type: none"> ○ SSSIs ○ NNR ○ LoWS ○ Ancient Woodland ○ Protected lanes ▪ Other sensitive designated or non- designated receptors ▪ Condition of the nearest sensitive receptors (where viable) ▪ Site visit surveys on typical abundance and frequency of habitats (DAFOR scale)
To conserve and enhance water quality and resources and help to achieve the objectives of the Water Framework Directive	<ul style="list-style-type: none"> ▪ Water quality ▪ Pollution of water course 	<ul style="list-style-type: none"> ▪ Will it help to ensure that good status of surface water is achieved and that deterioration in the status of waters is prevented? ▪ Will it help to ensure that good status of groundwater is achieved and that deterioration in the status of waters is prevented? 	<ul style="list-style-type: none"> ▪ Water quality (and trends) in river basin district (river quality data). Compliance with emission limits in identified locations. ▪ Compliance with environmental quality standards in identified locations.
3) To conserve and enhance the District's landscape character and townscapes	<ul style="list-style-type: none"> ▪ The local landscape varies in its sensitivity to change 	<ul style="list-style-type: none"> ▪ Will landscape character areas be protected? ▪ Will it enhance and/or conserve the countryside? Will the District's best agricultural land be protected? ▪ Will it seek to direct development outside the Green Belt? 	<ul style="list-style-type: none"> ▪ Developments permitted contrary to Landscape Character Assessment 'sensitivities to change'. ▪ Number and extent of field boundaries affected. ▪ Percentage of applications permitted on the District's best agricultural land (from ALC)
4) To conserve and enhance soil and contribute to the sustainable use of land	<ul style="list-style-type: none"> ▪ Protecting the best and most versatile soil 	<ul style="list-style-type: none"> ▪ Will it seek to protect the District's best and most versatile soil (Grade 2)? ▪ Will it seek to direct development away from Grade 2 soil, where feasible and in consideration of the impacts and benefits of development? 	<ul style="list-style-type: none"> ▪ Proportional loss of Grade 2 agricultural land. ▪ Proportion of development directed to Grade 3 agricultural land. ▪ Proportion of development on brownfield land.
5) To maintain and enhance the District's cultural heritage assets and their settings	<ul style="list-style-type: none"> ▪ A strong historic integrity with historic settlements and many historic buildings and 	<ul style="list-style-type: none"> ▪ Will it protect and enhance sites, features and areas of historical, archaeological and cultural value in both urban and rural areas? ▪ Will areas of historic character be protected from 	<ul style="list-style-type: none"> ▪ Proximity to nearest (including its setting): <ul style="list-style-type: none"> - Scheduled Monument? - Listed Building? - Conservation Area?

SA Objective	Sustainability issue(s)	Key questions – strategy and policy	Potential indicators
	monuments	development? <ul style="list-style-type: none"> ▪ Will the character and setting of historic settlements be protected as identified in the Uttlesford District Historic Environment Characterisation Project (ECC, 2009)? ▪ Does it seek to enhance the range and quality of the public realm and open spaces? ▪ Will it reduce the amount of derelict, degraded and underused land? ▪ Does it encourage the use of high quality design principles to respect local character? ▪ Will any adverse impacts be reduced through adequate mitigation? 	<ul style="list-style-type: none"> - Registered Historic Park or Garden? - Site identified in the Historic Environment Record? - Building of local interest? - Other historic feature? <ul style="list-style-type: none"> ▪ Number and spatial extent of listed buildings ▪ Number and spatial extent of scheduled monuments ▪ Buildings At Risk Register Heritage at risk surveys ▪ Percentage of conservation area demolished or otherwise lost. Amount of derelict properties and/or vacant land ▪ Number of heritage assets being positively removed from the heritage at risk register. ▪ Amount of damage to listed buildings or scheduled monuments ▪ Management of designated and undesignated historic environment assets ▪ Numbers of undesignated historic environment assets lost through the planning process
To reduce contributions to climatic change	<ul style="list-style-type: none"> ▪ Future climate change projections ▪ Energy consumption ▪ High private vehicle usage 	<ul style="list-style-type: none"> ▪ Will it reduce emissions of greenhouse gases by reducing energy consumption? ▪ Will it lead to an increased proportion of energy needs being met from renewable sources? ▪ Does it ensure more sustainable modes of travel are provided? ▪ Will it encourage greater energy efficiency? ▪ Will it improve the efficient use of natural resources? 	<ul style="list-style-type: none"> ▪ Carbon Dioxide emissions Energy consumption GWh/households ▪ Spatial extent of flood zones. ▪ Air Quality Management Areas and PM10 emissions ▪ Percentage of energy supplied from renewable sources.
7) Reduce and control pollution	<ul style="list-style-type: none"> ▪ Number of AQMAs and other areas exceeding NO₂ threshold ▪ Ambient noise levels around Stansted airport and major roads ▪ Water quality targets in order to reduce and control pollution across 	<ul style="list-style-type: none"> ▪ Will it improve, or not detrimentally affect air quality? ▪ Will emissions be limited to levels that will not damage natural systems and affect human health? ▪ Does it ensure that National Air Quality Standards are met at relevant points? ▪ Does it seek to improve or avoid increasing traffic flows generally and in particular through AQMAs? ▪ Does it seek to protect rural areas from increased traffic? ▪ Will it lead to no deterioration on the quality of water 	<ul style="list-style-type: none"> ▪ Number and spatial extent of AQMA's in the District ▪ NO₂ emissions ▪ Recorded traffic flows ▪ Location and extent of AQMAs in relation to infrastructure requirements ▪ Location and extent of potentially significant junctions in relation to infrastructure requirements ▪ Percentage of water bodies at

SA Objective	Sustainability issue(s)	Key questions – strategy and policy	Potential indicators
	all waterbodies (including surface and groundwaters), and from all land uses proposed, including wastewater and as a result of increased energy use	<p>bodies?</p> <ul style="list-style-type: none"> ▪ Does it promote the inclusion of Sustainable Drainage Systems in new developments? ▪ Does it seek to reduce, or not detrimentally affect noise levels? ▪ Does it seek to protect soil quality, including the remediation of contaminated sites? 	<p>good ecological status or potential</p> <ul style="list-style-type: none"> ▪ Percentage of water bodies assessed at good or high biological status ▪ Percentage of water bodies assessed at good chemical status ▪ Number of Sustainable Drainage Systems applications and number granted ▪ Ambient noise levels ▪ Development on PDL
8) To reduce the risk of flooding	<ul style="list-style-type: none"> ▪ Fluvial flood risk ▪ Pluvial flood risk ▪ Flood risk from other sources 	<ul style="list-style-type: none"> ▪ Does it seek to avoid development in areas at risk of flooding? ▪ Does it seek to avoid increasing flood risk in areas away from initial development? ▪ Does it take account of climate change in relation to flooding? ▪ Does it seek to manage and mitigate the risk of flooding? ▪ Is/will the sequential test being used to reach decisions on development proposals? ▪ Will developer contributions be utilised for the provision and maintenance of flood defences? ▪ Does it require sustainable drainage systems to be included within new development? 	<ul style="list-style-type: none"> ▪ Location of main rivers in District. ▪ Spatial extent of flood zones 2 and 3 ▪ Residential properties flooded from main rivers ▪ Planning permission in identified flood zones granted permission contrary to advice from the Environment Agency ▪ Incidences of flooding and location ▪ Distance of site to floodplains ▪ SFRA results ▪ Incidences of flood warnings in site area ▪ Distance to areas that are susceptible to surface water flooding – updated Flood Map for Surface Water Flooding (EA) ▪ On site and nearby topography via ordnance survey mapping ▪ Number of applications where there was a failure to pass the sequential test, even though sites at lower risk of flooding were available, but other planning reasons were given for granting planning permission.
9) To promote and encourage the use of sustainable methods of travel	<ul style="list-style-type: none"> ▪ High private vehicle usage ▪ Public transport, walking and cycling coverage across the District 	<ul style="list-style-type: none"> ▪ Will it increase and/or improve the availability and usability of sustainable transport modes? ▪ Will it seek to encourage people to use alternative modes of transportation other than private vehicle? ▪ Will it contribute positively to reducing social exclusion by ensuring access to jobs, shopping, leisure facilities and services? ▪ Will it reduce the need to travel? 	<ul style="list-style-type: none"> ▪ Access to services and business' by public transport ▪ Indices of Multiple Deprivation ▪ Travel to work methods and flows ▪ Car ownership ▪ Network performance on roads ▪ Public transport punctuality and efficiency

SA Objective	Sustainability issue(s)	Key questions – strategy and policy	Potential indicators
		<ul style="list-style-type: none"> Will it lead to the integration of transport modes? Will it improve rural public transport? Will it promote the integration of sustainable school travel and transport? 	
10) To ensure accessibility to services	<ul style="list-style-type: none"> Access to services such as education, healthcare and jobs, and other amenities Access to natural greenspace Self-sustainability 	<ul style="list-style-type: none"> Will it contribute positively to reduce social exclusion by ensuring access to jobs, shopping, services and leisure facilities for all? Will it improve access to jobs, shopping, services and leisure facilities? Will it reduce the need to travel? Will it increase traffic in rural areas? Does it protect or increase village facilities? Will it lead to the integration of transport modes? Does it seek to concentrate development and facilities in town centres or where access via sustainable travel is greatest? Will it assist in reducing the number of road casualties and ensure ease of pedestrian movement especially for the disabled? 	<ul style="list-style-type: none"> Residents opinion on availability of open space/leisure facilities Access to services by public transport Indices of Multiple Deprivation – sub-domain scores Natural England Accessible Natural Greenspace Standards Recorded traffic flows KSI casualties for adults and children Car ownership Location of site with regards to areas of high deprivation
11) To improve the population's health and promote social inclusion	<ul style="list-style-type: none"> Access and provision of healthcare Needs of an ageing population Access to natural greenspace Access to Sport and recreation Access to facilities generally on foot or by bicycle Obesity and other health issues 	<ul style="list-style-type: none"> Will it reduce health inequalities? Will it improve access to high quality health facilities? Will it improve air quality? Will it improve water quality? Will it increase access to sport and recreation facilities and open space? Will improve services for young people? Will it contribute positively to reducing social exclusion for all members of society? Will it ensure access to jobs, shopping, leisure facilities and services is available for all? Will there be measures to increase the safety and security of new development and public realm? Does it seek to reduce inequalities between areas and support cultural identity? Will it encourage access by walking or cycling, and will it increase the overall rates of walking and cycling? 	<ul style="list-style-type: none"> Life Expectancy Indices of Multiple Deprivation – sub-domain scores Residents opinion on availability of open space/leisure facilities Air Quality Management Areas (number and performance) and PM10 emissions KSI casualties for adults and children Natural England Accessible Natural Greenspace Standards (ANGSt) Recorded key offences Location and extent of recreational facilities to development site Location and extent of accessible greenspace to development site Proximity of site to healthcare facilities

SA Objective	Sustainability issue(s)	Key questions – strategy and policy	Potential indicators
		<ul style="list-style-type: none"> Does it respond to ageing demographics in all relevant areas of influence throughout the plan period? 	<ul style="list-style-type: none"> Percentage of population obese
12) To provide appropriate housing and accommodation to meet existing and future needs	<ul style="list-style-type: none"> Housing affordability Future population and household projections Future housing growth and need Affordable and social housing 	<ul style="list-style-type: none"> Will it provide housing which meets local needs? Will it increase the range and affordability of housing for all social groups to the designated target? Will it reduce the number of unfit homes? Does it allow for homes to be adapted for lifetime use, or make provisions for them to be included in new development? Does it seek to deliver self-build and custom build homes? Does it respond to the needs of an ageing population? Is there scope to deliver the independent living agenda in larger developments? Will homes be designed with a low carbon footprint? Are dwellings easily accessed by transport links, jobs, services, commercial areas and leisure facilities? Will homes be designed to enhance the existing street scene creating a better cultural heritage & public realm? Will homes be sufficiently phased during the plan period and beyond in light of the East of England Plan or subsequent targets? Will homes be supported by adequate greenspace? Does it support affordable housing in rural areas? Will rural housing be supported by local services? Does it make provision for gypsy and traveller accommodation? 	<ul style="list-style-type: none"> House Prices LA dwelling stock below the 'Decent Home Standard' Indices of Multiple Deprivation Score – particularly Housing and Services Domain and the Living Environment Deprivation Domain Number of affordable dwelling completions Annual dwelling completions Size and age of housing stock Access to sustainable transport links Population projections and forecasts Crime rates
13) To promote the efficient use of resources and ensure the necessary infrastructure to support sustainable development	<ul style="list-style-type: none"> Water resources Open space Housing growth to be supported by jobs, infrastructure and services 	<ul style="list-style-type: none"> Does it seek to ensure the provision of sufficient infrastructure in line with projected increases in population? Does it ensure that adequate school expansion, new healthcare and community facilities are provided where the size of housing development requires it? Will water resources be able to accommodate growth? 	<ul style="list-style-type: none"> Water cycle study S106 agreement contributions Transport Assessments Additional capacity of local schools Number of GPs and dentists accepting new patients ANGSt

SA Objective	Sustainability issue(s)	Key questions – strategy and policy	Potential indicators
	<ul style="list-style-type: none"> Foul water disposal/ sewerage infrastructure Reducing waste arising and dealing with waste in a more sustainable manner 	<ul style="list-style-type: none"> Does it ensure the reinforcement of wastewater treatment works or the provision of alternatives (where required) to support growth? Will financial contributions be adequate to provide the necessary infrastructure? Does it seek to promote the minimisation of waste at its source, and integrate solutions into the design of new development? Does it ensure that infrastructure/highway improvements will be made (where required) to support growth? Will it ensure that infrastructure is provided prior to use or through phasing of development? Will it improve the efficient use of natural resources? 	<ul style="list-style-type: none"> Amount of waste recycled/landfilled.
14) To improve the education and skills of the population	<ul style="list-style-type: none"> Provision of education Areas deprived of training, education and skills 	<ul style="list-style-type: none"> Does it seek to improve existing educational facilities and/or create more educational facilities? Does it seek to improve existing training and learning facilities and/or create more facilities? Will the employment opportunities available be mixed to suit a varied employment skills base? Will new housing be supported by school expansion or other educational facilities where necessary? 	<ul style="list-style-type: none"> GCSE or equivalent performance Level 2 qualifications by working age residents Level 4 qualifications and above by working age residents Employment status of residents Average gross weekly earnings Standard Occupational Classification
15) To ensure sustainable employment provision and economic growth	<ul style="list-style-type: none"> Local employment and wage differences Level of unemployment High proportion of rural based businesses 	<ul style="list-style-type: none"> Will it increase vitality of existing towns and local centres? Does it promote and enhance the viability of existing centres by focusing development in such centres? Will retailing in town centres be enhanced in areas of identified need? Will it encourage employment and reduce unemployment overall? Does it secure more opportunities for residents, of all abilities, and in all employment sectors, to work in the district? Will new housing be supported by adequate local employment opportunities? Will it improve business development and attract investment? 	<ul style="list-style-type: none"> Employment land availability Typical amount of job creation (jobs per ha) within different use classes. Percentage change and comparison in the total number of VAT registered businesses in the area Businesses by industry type Amount of vacant industrial floorspace Amount of high quality agricultural land Travel to work flows Employment status by residents and job type Job densities Economic activity of residents Average gross weekly pay

SA Objective	Sustainability issue(s)	Key questions – strategy and policy	Potential indicators
		<ul style="list-style-type: none"> ▪ Does it support small businesses to grow and encourage business innovation? ▪ Will it make land and property available for business development? ▪ Will it enhance the Districts potential for tourism? ▪ Will it encourage rural economy and diversification of it? ▪ Does it enhance consumer choice through the provision of range of shopping, leisure and local services to meet the needs of the entire community? ▪ Does it prevent further loss of retail and other services to rural areas? ▪ Will it lead to development having an adverse impact on employment for existing facilities? ▪ Will emerging policy ensure there is adequate future provision of Early Years and Childcare? 	<ul style="list-style-type: none"> ▪ Proportion of business in rural locations ▪ Amount of retail, leisure and office floorspace in town centres. ▪ Implemented and outstanding planning permissions for retail, office and commercial use ▪ Number and type of services ▪ Pedestrian footfall count ▪ Number of post offices closed down ▪ Number of village shops closed down

Part 1: What has plan-making/
SA involved up to this point?

4. Introduction (to Part 1)

- 4.1 Local plan-making has been underway since 2015, with a wide range of evidence produced to inform the development of the Local Plan. **Table 4.1** sets out the key Local Plan and SA Documents published along with dates for consultation. The Local Plan documents and the evidence base (including the SA Reports) can be viewed and downloaded on the Council's website.⁵

Table 4.1: Local Plan and SA stages

Local Plan Documents & Consultation	SA Documents & Consultation
	SA Scoping Report Sent to statutory consultees and published for wider consultation from July to September 2015
Issues and Options Consultation Document (Reg 18) Public consultation from October to December 2015	Areas of Search and Strategic Scenarios SA Report Public consultation from October to December 2015
Draft Local Plan Consultation (Reg 18) Public consultation from July to September 2017	SA Report Public consultation from July to September 2017
Pre-Submission Local Plan Consultation (Reg 19) Public representation period from June to August 2018	SA Report Public representation period from June to August 2018
Addendum of Focussed Changes to the Reg 19 Plan Public representation period from October to November 2018	SA Report Public representation period from October to November 2018
Submission of the Pre-Submission Local Plan and Addendum of Focused Changes in January 2019	Submission SA Report (this report) Public representation period from January to February 2019.

- 4.2 It is clear from the table above that a significant amount of work has been carried out to date to through the plan-making/ SA process. In-line with regulatory requirements, there is a need to explain within this report how work was undertaken to develop and then appraise reasonable alternatives, and how the Council then took into account appraisal findings when finalising the Local Plan.
- 4.3 This part of the report presents information regarding the consideration of reasonable alternatives. This information is important given regulatory requirements.⁶

Structure of this part of the report

- 4.4 This part of the report is structured as follows:

Chapter 5 sets out the work leading up to and the options presented in the Regulation 18 Issues and Option Document and accompanying SA Report that were published in 2015.

Chapter 6 explains how alternatives were refined and considered through the SA process following the Issues and Options consultation and leading up to the publication of the Regulation 18 (Draft) Local Plan in 2017.

⁵ <https://www.uttlesford.gov.uk/article/4916/Documents-which-make-up-the-Local-Plan>

⁶ There is a requirement for the SA Report to present an appraisal of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with'. Whilst this report is not the SA Report, it is appropriate to present this information nonetheless for the benefit of stakeholders.

Chapter 7 explains how alternatives were refined and considered through the SA process following the Regulation 18 (Draft) Local Plan consultation and leading up to the publication of the Regulation 19 Pre-Submission Document and Addendum of Focussed Changes in 2018.

Chapter 8 clearly sets out the reasonable alternatives for garden communities and the district-wide spatial strategy, the findings of the appraisal of the options and the reasons for selecting the preferred approach in light of alternatives.

5. Regulation 18 Issues and Options 2015

Introduction

- 5.1 The development of a new Local Plan began in early 2015 following the withdrawal of the previous Local Plan in January 2015. The Inspector's findings published in December 2014 identified a number of significant concerns in relation to the soundness of the withdrawn Local Plan. These related to the objectively assessed housing need as well as the proposal for a new 'linked' new settlement at Elsenham for 2,100 dwellings, which he considered to be a "*major village expansion*" rather than a new settlement. He also referred to a lack of evidence to demonstrate the suitability of the local roads and the capacity of junction 8 on the M11.
- 5.2 However, in the letter dated 19 December 2014 the Inspector concluded, "*There appeared to me to be fairly widespread recognition that some form of 'new settlement(s)' may form an appropriate means for catering for the future long-term growth of the District and, if so, that this should be on a scale bold enough to achieve maximum possible sustainable critical mass and a long term solution, especially if there are judged to be limits as to how far relatively small towns with the characters of Saffron Walden and Great Dunmow can grow sustainably, attractively, and in an integrated way through successive phases of peripheral expansion. However, I do not consider it for me to comment further upon this matter.*"⁷

Settlement hierarchy

- 5.3 The Council decided to carry forward the settlement hierarchy that was set out in the withdrawn Local Plan and this is broadly based on the level of services available at each settlement. The Planning Inspector for the previous Local Plan made the following comments on the approach to the settlement hierarchy in his report of 19th December 2014:

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

*"Having said this, where it can be justified by relevant economic, social and environmental factors a case can sometimes be made to direct a greater or lesser amount of development to a settlement than would reflect its strict place in the settlement hierarchy. Some of the factors discussed during the hearing (eg locally identified demographic and other needs, local constraints and opportunities, patterns of bus services, and inter-relationships between particular settlements) can be relevant to such decisions and can be considered in taking the plan forward."*⁸

- 5.4 The proposed settlement hierarchy is set out in **Table 5.1** below.

⁷ https://www.braintree.gov.uk/info/200643/section_1/1065/section_1_examination_publication_local_plan/4

⁸ Ibid.

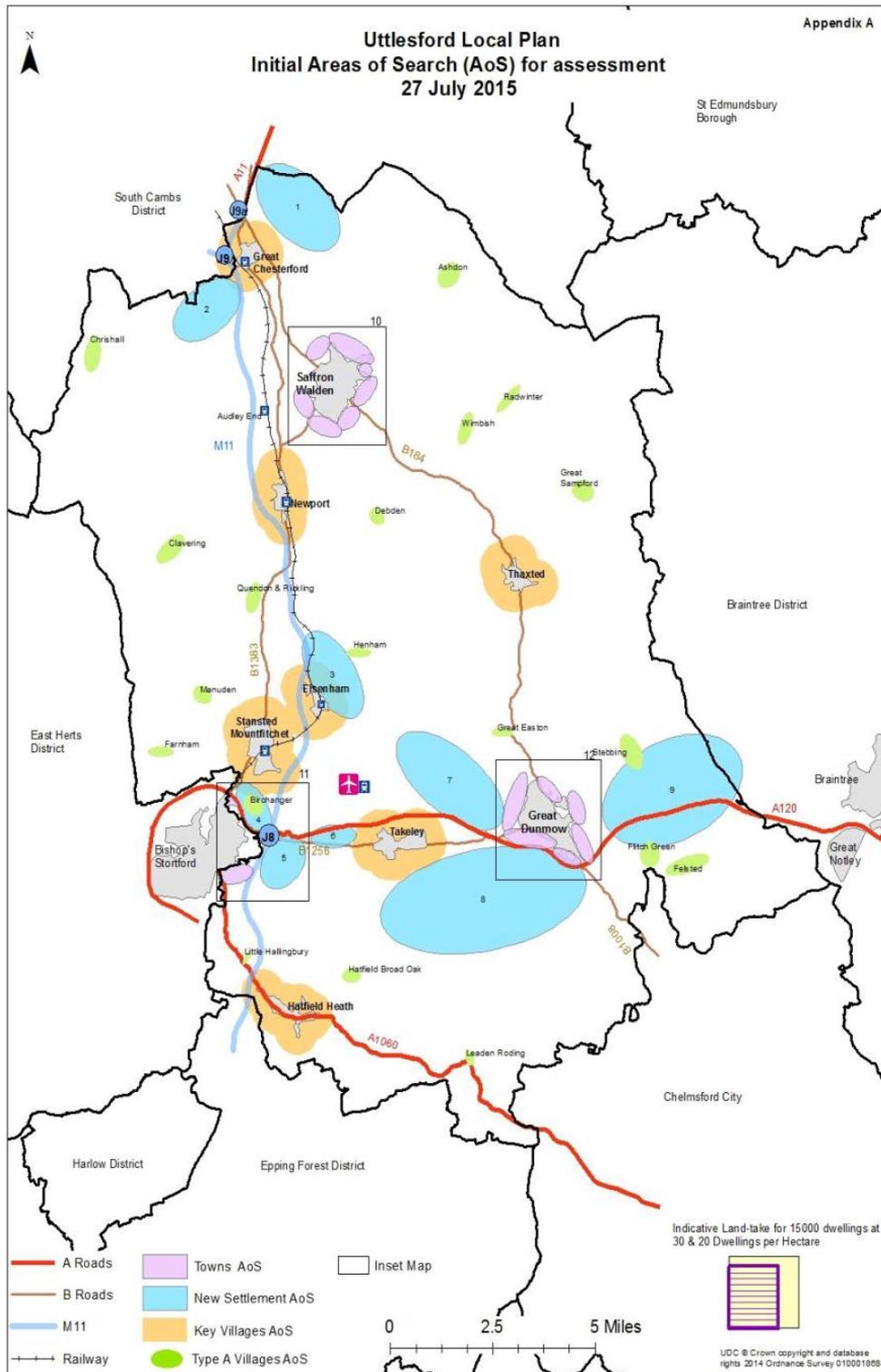
Table 5.1: Settlement Hierarchy

Function	Settlement
Market Towns	
Major focus for development in the district - suitable for larger scale development.	Saffron Walden, Great Dunmow.
Key Villages	
Major focus for development in the rural area - suitable for a scale of development that would reinforce role as provider of services to a wide rural area.	Elsenham, Great Chesterford, Hatfield Heath, Newport, Stansted Mountfitchet, Takeley, Thaxted.
Type A Villages	
Villages with primary school and with some local services, e.g. village hall/pub/shop - suitable for a scale of development that reinforce role as a local centre.	Ashdon, Birchanger, Chrishall, Clavering, Debden, Hatfield Broad Oak, Henham, Leaden Roding, Little Hallingbury, Manuden, Farnham, Felsted, Fritch Green, Great Easton, Great Sampford, Quendon and Rickling, Radwinter, Stebbing, Wimbish.
Type B Villages	
Villages without primary schools but which may have some local services e.g. village hall/pub/shop - suitable for a scale of development that would reinforce role as a providers of services mainly to its own community.	Arkesden, Aythorpe Roding, Barnston, Berden, Broxted, Elmdon, Great Canfield, Great Hallingbury, Hadstock, Hempstead, High Easter, High Roding, Langley, Lindsell, Littlebury, Little Canfield, Little Easton, Little Dunmow, Ugley, Wendens Ambo, Wicken Bonhunt, Widdington, White Roding, other small villages and hamlets.

Areas of Search

- 5.5 As a first step towards identifying locations for growth the Council explored and identified a number of broad locations or 'Areas of Search' (AoS) for development. Within these AoS the Council considered the potential for different types of development, including for housing and employment. It is important to note that the AoS were not underpinned by specific sites at this stage as work was still to be carried out to identify available and suitable site options within the district.
- 5.6 AoS for potential new settlements were identified based on their potential to contribute to effective cross-boundary strategic planning priorities; minimise the need to travel by car; leisure opportunities and other facilities; and access to strategic highways and the rail network. Areas were excluded if they contained significant constraints, such as Registered Parks or Gardens and Sites of Special Scientific Interest (SSSIs).
- 5.7 AoS were identified around the two main settlements in the district (Saffron Walden and Great Dunmow) as well as on the edge of Bishop's Stortford, which falls within East Hertfordshire District. As with the new settlement AoS, areas around the main settlements were excluded from consideration if they contained significant constraints. For example, the west of Saffron Walden was not identified as an AoS given the presence of the Audley End Historic Park and Garden.
- 5.8 The Council also explored the potential for focusing development at the Key Villages (in the form of village extensions) and Type A Villages (in the form of small sites) as per the district's settlement hierarchy.
- 5.9 The identified AoS are presented in Figure 1 on the next page.

Figure 1: Areas of Search (2015)



5.10 The Council took the step of considering each AoS against the SA Framework, identifying key constraints and providing a summary of potential issues and opportunities. The findings of this work were presented in an SA Report that accompanied the Issues and Options Document on consultation in October 2015.⁹ For completeness the SA findings at this stage are also provided in **Appendix III** of this SA Report.

⁹ <https://www.uttlesford.gov.uk/article/4946/Sustainability-appraisal>

5.11 The SA at that time concluded that:

“...focusing development to one or more new settlements is likely to have comparatively less constraints than extensions of existing settlements and villages, or perhaps more specifically, new settlements have better scope to mitigate negative impacts on site. There is also less of a threat of secondary and cumulative impacts on existing settlements where multiple extensions to existing settlements may be required to meet housing targets.

It is however likely that capacity for expansion exists in the surrounding areas of each of the towns and such a focus, if proportionate to the existing settlement and in mind of identified broad constraints, would contribute to meeting the existing and identified housing needs of the District. This will be particularly important in the earlier stages of the plan period.

Development of the Key Villages and Type A Villages will also meet this need, again if proportionate to each settlement and in mind of each’s specific constraints. A number of villages contain rail links and this benefit, in a District that is not particularly well served by strategic roads or public transport due to its rural nature enhances the sustainability of development in these settlements pending other considerations.

The development of one or more new settlements would contribute to meeting future needs, again in consideration of known constraints in specific areas; broadly summarised as predominantly transport implications and suitable access to the strategic road network. Should suitable additional junctions or access to these strategic roads be forthcoming, development of the surrounding villages may become more sustainable in turn. This would similarly be the case for any new rail infrastructure in the District.”

5.12 At this stage no decisions had been made in terms of a preferred AoS for a new settlement or for the location of new development at the towns or villages.

Representations

5.13 In response to the identified AoS the following comments were received from key stakeholders:

- **Natural England:**
 - **General:** In assessing the potential for new development the Council should include consideration of the potential increase in recreational pressure on the Hatfield Forest SSSI and NNR and also the potential impacts of traffic-derived air pollution upon nearby designated sites.
- **Historic England:**
 - **General:** The historic environment and impact on heritage assets is relevant to every area of search, and there may be a need for specific heritage impact assessments depending on the location and its potential for affecting heritage assets.
 - **Saffron Walden:** Growth has to be handled very carefully to ensure that its historic environment is conserved. The town has an important setting with Audley End house and gardens and key approaches providing views of St Marys and other heritage assets. Transport implications are a concern. They welcome the exclusion of Audley End Park as an AoS.
 - **Great Dunmow:** Is a historic town of considerable importance. The wider setting of the town is significant with the valley of the River Chelmer to the east and the historic landscape of Little Easton to the north west and the Registered Park and Garden of Easton Lodge.
- **Environment Agency:**
 - **New settlements:** The developers must work with the sewerage providers/water companies ahead of the preferred options so as to ensure there is a feasible and viable solution, including any necessary permit requirements for new works or upgrades, prior to any allocation under the Local Plan.

- **Saffron Walden:** All of the AoS around Saffron Walden are located over principle aquifer and SPZ2 and should be considered very sensitive in respect of controlled waters. They also note that the AoS 10a and 10f are located on designated SPZ1. They consider that any discharge of surface water into watercourses that are connected to or from part of the Slade System must either be restricted to Greenfield runoff rates or reduced to ensure there is no increase in flood risk in Saffron Walden.
- **Essex County Council (ECC):**
 - **New Settlements:** Any new settlement would require its own secondary school as part of the provision. This would require a minimum of some 5,000 houses/flats to support this provision. Any new settlement(s) would therefore likely be in the range of 5,000 - 10,000 homes which would be developed over a 20 - 25 year period.
 - **Villages:** Expressed concerns about development at Elsenham and the impact it may have on the rural road network. They recommend that consideration be given to the scale and quantum of growth than can be delivered within the village locations; it is more challenging to deliver alternative sustainable travel modes. The gradual encircling of development within village locations may have detrimental impact on the historic cores. It may impact the setting or significance or force inappropriate development within the village cores. They scale and type of development should be controlled in villages with significant historic cores such as Thaxted, Newport and Gt Chesterford.
 - **Saffron Walden:** Consideration should be given to how a link road can be delivered - there is no reference to the Radwinter Road/Thaxted Road link road. They recommend that consideration is given to how edge of settlement growth may be accommodated considering the air quality issues. ECC suggested that it may be necessary to link adjoining sites to minimise the traffic utilising the centre of the town e.g. 10a,b and c then provide a northern distributor road. Sites 10d – f may also be linked to deliver a south western distributor road. They suggest the SA uses the updated EA Flood Map for surface water. It is recommended that the strategy be proactive to ensure that future development does not increase flood risk and that there is adequate flood risk mitigation. ECC considers that the strategy may need to ensure the maintenance of existing flood management infrastructure and or the installation of new flood risk management infrastructure to minimise the impact of new development. There needs to be consideration of the availability of school places and the likelihood of schools expansion, also safe travel routes between developments and schools to enable walking and cycling. Consideration also needs to be given to existing and future early years and child care facilities.
 - **Great Dunmow:** If additional growth is proposed consideration should be given to improving sustainable transport connectivity between Stansted Airport, Great Dunmow and Braintree. Consideration should be given to future development to the east of the town due to the impact it may have on Hoblongs/A120 junction. It is recommended that UDC considers the availability of school places at the existing primary schools and the Helena Romanes schools and 6th form centre, in considering whether further growth and development is viable.
- **Highways England:**
 - **Saffron Walden:** Concerned that there would be possible traffic affect upon M11 J9a which would need to be considered.
 - **Bishop's Stortford:** Development in these areas is likely to have a material impact up M11 J8 which is already at capacity at certain times of the day.
 - **Great Dunmow:** Development in this area is likely to impact M11 J8 and the A120 corridor, public transport linkage both to Braintree and Stansted/Bishop's Stortford would need a step change if this scenario were to be seriously considered. Plugging extra development on to Great Dunmow would open the opportunity for the provision of more sustainable options as a large population would mean demand was available to make other options more economically viable that currently are not, such as more shops and entertainment venues.

- **Hertfordshire County Council**

- **Bishop's Stortford:** New residents in these areas would look to Bishop's Stortford for service provision, especially schools. The document suggests that 500 units could be provided in 11a and 11b, this equates to 1 form of primary and secondary school places. There is little capacity in the primary schools to expand. Any potential capacity across Bishop's Stortford is required to deal with future growth from existing communities. HCC requests that developer contributions and/or a new school is sought by UDC. AoS 11b includes land previously identified by HCC as being required to enable the expansion of secondary schools in Bishop's Stortford. It is requested that this land is excluded from any development proposals.

Strategic scenarios

- 5.14 At this stage (in 2015) a joint Strategic Housing Market Assessment (SHMA) had been commissioned for East Hertfordshire, Harlow, Epping Forest and Uttlesford Districts to cover the M11 Housing Market Area. The purpose of the joint SHMA was to establish the Objectively Assessed Housing Need (OAHN) for the HMA and the four districts. The joint SHMA was not published until September 2015; however, the emerging findings were used to inform the development of a number of strategic scenarios. The findings of the joint SHMA are set out in more detail in Chapter 6 of this SA Report.
- 5.15 The Council identified four strategic scenarios based on development of 580 dwellings a year or 8,750 dwellings over 15 years, which was broadly consistent with the emerging findings of technical work at that stage and reflected the Inspector's views on the OAHN for the withdrawn Local Plan.
- 5.16 At the time, existing planning permissions had been granted for around 5,000 dwellings and these were therefore common to all the identified scenarios. A windfall allowance of 50 dwellings per year or 750 over 15 years was also made and held constant for each scenario. It is understood that this approach was endorsed by the Inspector for the withdrawn Local Plan in his report of December 2014. The four strategic scenarios based on 580 dwellings per year are set out in the table below.

Table 5.2: Strategic Scenarios A to D based on 580 dwellings per year (2015)

	Scenario A New Settlement	Scenario B Villages and Edge of Bishop's Stortford	Scenario C Towns	Scenario D Hybrid 1
Location				
Constants				
Existing planning permissions	5,000	5,000	5,000	5,000
Windfall allowance	750	750	750	750
Variables				
Edge of Bishop's Stortford	0	500	0	500
Great Dunmow	0	0	1,500	500
Saffron Walden	0	0	1,500	500
Key Villages	0	1,500	0	500
Type A Villages	0	1,000	0	500
New Settlement	3,000	0	0	500
Total	8,750	8,750	8,750	8,750

5.17 Further detail on the scenarios is provided below. They were described in 2015 as follows:

- **Scenario A (Focus on a new settlement):** Under this scenario all the development would be focused on a single new settlement. The scale of the new settlement could ultimately reach 10,000 or more dwellings. However, applying reasonable assumptions of construction rates at around 300 dwellings per year, 3,000 dwellings could be completed by 2033, with the remainder of construction in the next 15-year plan period.
- **Scenario B (Focus on Villages and the edge of Bishop's Stortford):** One possible method of distributing development amongst the villages would be to direct a higher level of development to the seven key villages and a lower level of development to the 20 'Type A' villages. As an example, if assessment suggested the potential capacity for 1,500 dwellings in the Key Villages, and this were distributed evenly between all seven, this would result in around 215 new dwellings per key village. If assessment suggested that there was potential for 1,000 dwellings in the 20 Type A villages, this would result in 50 dwellings per village. In practice it is unlikely that villages will all have the same level of capacity and variations between the villages would need to be taken into account. Bishop's Stortford lies within East Hertfordshire District, but the boundary of Uttlesford District directly adjoins part of the town. Subject to assessment, there may be the potential for a limited amount of development in the two areas of search identified here, perhaps in the region of 500 dwellings in total.
- **Scenario C (Focus on Towns):** The towns of Saffron Walden and Great Dunmow are the main centres of population and services in the district. This scenario would see 1,500 dwellings provided in each town. Both towns have accommodated considerable levels of development in recent years and there are existing planning permissions for significant amounts of further development. Careful consideration will need to be given to the character and setting of the towns, and also the capacity to expand existing services and facilities, such as schools and GP provision.
- **Scenario D (Hybrid 1):** This option would see development spread between towns and villages, and there is an assumption that a start could be made on delivery of housing at a new settlement towards the end of the plan period, with the majority of construction taking place after 2033. This scenario may be considered reasonable if assessment of a new settlement shows that there is no realistic prospect of early delivery.

5.18 A further three strategic scenarios were developed based on a higher level of growth at 750 dwellings a year or 11,750 dwellings over 15 years. The three strategic scenarios based on 750 dwellings per year are set out in the table below.

Table 5.3: Strategic Scenarios E to G based on 750 dwellings per year (2015)

Location	Scenario E Two New Settlements	Scenario F Towns and Villages	Scenario G Hybrid 2
Constants			
Existing planning permissions	5,000	5,000	5,000
Windfall allowance	750	750	750
Variables			
Edge of Bishop's Stortford	0	500	500
Great Dunmow	0	1,500	1,000
Saffron Walden	0	1,500	1,000
Key Villages	0	1,500	1,000
Type A Villages	0	1,000	1,000
New Settlement	6,000	0	1,500
Total	11,750	11,750	11,750

5.19 Further detail on scenarios E to G is provided below. They were described in 2015 as follows:

- **Scenario E (Two New Settlements):** This scenario is very similar to Scenario A but includes two new settlements, each developed at a rate of around 300 dwellings per year, reflecting the higher level of development needed to meet a higher district-wide housing requirement.
- **Scenario F (Towns and Villages):** This scenario is a combination of scenarios B and C, reflecting the higher District-wide housing requirement under this scenario.
- **Scenario G (Hybrid 2):** This scenario is similar to scenario F but the introduction of a new settlement takes some of the pressure off the towns and villages.

5.20 Each of the seven strategic scenarios were assessed against the SA Framework and the findings presented in the SA Report that accompanied the Issues and Options Document on consultation in 2015.¹⁰ For completeness the findings of the SA work at this stage are presented in **Appendix III** of this SA Report.

5.21 The SA Report providing some clarification stating that:

“the scenarios presented should not be mistaken for a ‘menu’ of options from amongst which the Council can choose a single one. Whilst residents, District Councillors, and others may indicate a preference for one or other scenario now, it is only upon completion of a review of the evidence over the coming months that the Council will be in a position to make an evidence-based decision, including on vital matters of deliverability.

The scenarios are limited in that at this stage until assessment has been carried out it is not possible to take a view in relation to the pace and phasing of development, which is a crucial in order to deliver a continuous flow of development over the plan period.

The scenarios should therefore be understood as a tentative first step towards understanding the implications of the levels of growth that the Council needs to plan for.

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

5.22 The SA concluded the following at this stage:

“The appraisals of the scenarios in the report highlighted that no single scenario could be guaranteed to meet the current identified and future needs of the District in a wholly sustainable manner. It should be acknowledged that a large amount of potentially adverse environmental impacts are more accurately a result of the growth targets over the plan period, and that any forthcoming options should be developed that seek to minimise these where possible and also seek to maximise benefits.

It was recommended that a suitable balance is sought between meeting existing needs in the District as well as future needs. This relates not only to an element of dispersal across the District, but also in exploring new settlement options in a way that could meet annual housing delivery rates in the latter stages of the plan period. The principle of a new settlement can be seen to be a positive one regarding a number of sustainability objectives and it may be possible to turn constraints into positive impacts through effective masterplans and a spatial strategy that is advanced with awareness of these opportunities.

It was felt that the scenarios explored at this stage cover all reasonable options regarding the broad distribution of growth in the District. The sustainability implications of focusing development in any one tier of the settlement hierarchy, including one or more new settlements, have been explored fully within this sustainability appraisal. More refined distribution in any forthcoming spatial strategy will have been influenced by this sustainability appraisal and in response to the highlighted impacts of directing growth to all reasonable broad locations in the District”.

5.23 At this stage no decisions had been made in terms of a preferred scenario.

¹⁰ <https://www.uttlesford.gov.uk/article/4946/Sustainability-appraisal>

Representations

5.24 In response to the identified strategic scenarios the following comments were received from key stakeholders:

- **Historic England:**
 - A. Positive and/or negative impacts depending on the location of the new settlement and how it alleviates pressure for growth in existing settlements.
 - B. Implications for many of the district's historic villages, although the edge of Bishop's Stortford is less constrained in terms of heritage assets.
 - C. Diminish the sense of place and local distinctiveness of Saffron Walden and Great Dunmow plus impact on transport movements, although it would depend on site locations.
 - D. Mixture of the above effects.
 - E. Could have positive and/or negative impacts depending on its location and how it alleviates pressure for growth in existing settlements. It would seem harder to locate two new settlements without some degree of harm to the historic environment, given the richness and geographical spread of heritage assets within the district.
 - F. Potential negative implications for the historic environment depending on location.
 - G. Mixture of the above effects, albeit with the potential for greater impacts than Scenario D as more housing would have to be delivered.
- **Essex County Council:**
 - A. A new settlement is considered sustainable as it enables the infrastructure necessary to support a new community to be delivered effectively.
 - B. ECC is concerned that this scenario would promote greater volumes of traffic growth on the district's rural road network; detailed considerations needs to be given to the availability of school places at the existing primary schools, whether the scale of development is sufficient to warrant a new school, whether the development would enable children to walk or cycle to school.
 - C. In Saffron Walden this would generate sufficient demand for a new primary school. In relation to secondary schooling in Saffron Walden, in the long term this would lead to fewer pupils from outside the school's priority admissions area but in the medium term is likely to lead to the displacement of some pupils from within the priority admission area. Any children displaced from SWCHS would need to be accommodated at The Joyce Frankland Academy. In Great Dunmow this would generate sufficient demand for a new primary school. In relation to secondary schooling in Great Dunmow, if the existing school is relocated as previously proposed, work would need to be undertaken to ascertain if it could accommodate additional pupils or whether any adjustments to the school's paa could lead to another new school accommodating some of the additional pupils that would be generated by the additional housing.
 - D. From a highways and transportation perspective this is the least sustainable option, as it would make the deliverability of sustainable transportation challenging, and also accommodating development within the more remote rural locations throughout UDC would require intervention. It is also the least sustainable for delivery of future education services and facilities as relatively small scale housing development is unlikely to fund anything other than the expansion of an existing school which can be difficult and/or expensive.
 - E. Enables delivery of necessary infrastructure in planned way to support the new community. The larger settlement proposal would facilitate transport mitigation. Size important for secondary school/plans for growth beyond plan period.

- F. Concern about growth being spread throughout UDC as may not facilitate appropriate highway mitigation. For education considers that F) is an amalgamation of Scenario B and C, therefore see the response to question 16.
 - G. Least sustainable in transportation terms making delivery of sustainable transportation challenging while rural road network in UDC may also be an issue requiring intervention. Also is likely to make the provision of additional school places more difficult to deliver and expensive/unlikely to fund anything other than the expansion of an existing school.
- **Hertfordshire County Council**
 - Commented that development on the edge of Bishop's Stortford included in scenarios B and D equate to a need for an additional 1FE of both primary and secondary school places, which would be in addition to any additional school requirements arising out of development in East Hertfordshire. Regards E, Herts identified a potential requirement for a new 2FE primary school and a new 6FE secondary school to meet the future need in the town. The additional housing located on the edge of Bishop's Stortford within UDC has not been included within those identified requirements.

6. Regulation 18 (Draft) Local Plan 2017

Introduction

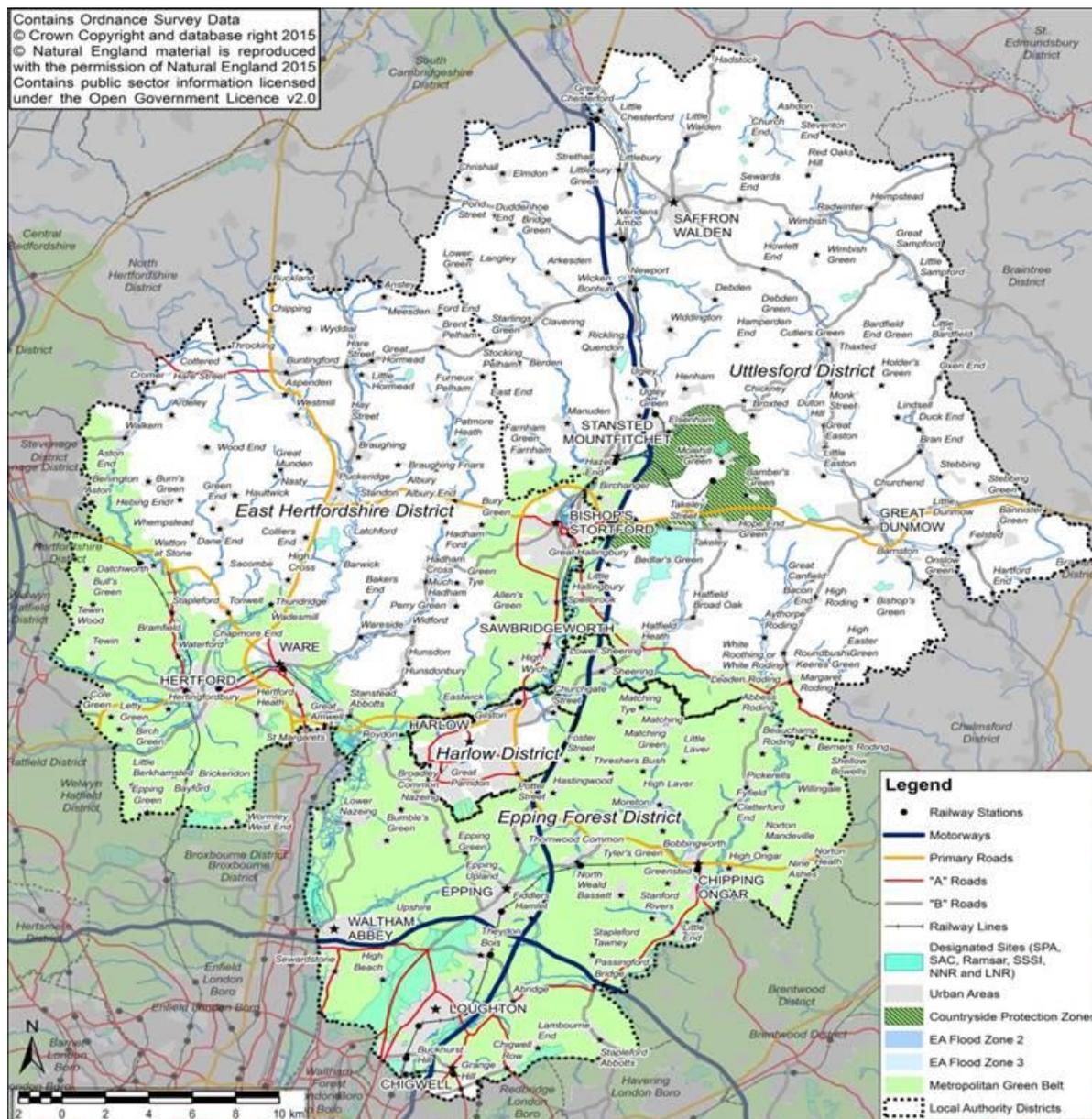
- 6.1 Following consultation on the Issues and Options Document and SA Report in 2015, the representations were reviewed and further technical work was carried out. This started to give the Council a clearer picture in terms of the overall level of need as well as the sites available within the district for development. Some of this further evidence is summarised and referred to within this chapter as it provides important context for the development of alternatives and decision-making at this stage in plan-making.
- 6.2 This chapter firstly discusses the emerging evidence at this stage as it provides important context for the development of alternatives. The discussion on evidence is split into two sections ‘top-down’ consideration of high-level issues and the ‘bottom-up’ consideration of district-level issues. The chapter then goes on to explain how this evidence informed the development and refinement of spatial strategy alternatives in 2016/17.

‘Top-down’ considerations

Housing Market Area (HMA)

- 6.3 A three step approach was taken, which ultimately resulted in the establishment of a preferred broad spatial strategy for the West Essex and East Hertfordshire HMA see **Figure 2**, including a decision on the approach to growth in and around Harlow. Harlow was recognised as the most sustainable location within the HMA to focus residential development given its role as a sub-regional centre for employment, its Enterprise Zone status; its important location on the London Stansted Cambridge corridor and the wider economic growth aspirations for the town.

Figure 2: West Essex and East Hertfordshire Housing Market Area



Step 1 - Establish understanding of housing and economic needs

6.4 As referred to in Chapter 5 of this report, a joint Strategic Housing Market Assessment (SHMA) was undertaken for the four authorities of the HMA - East Herts District Council, Epping Forest District Council, Harlow District Council and Uttlesford District Council - in order to establish Objectively Assessed Housing Need (OAHN) for the HMA.

6.5 The SHMA, which published in September 2015, identified OAHN for the HMA to be 46,100 dwellings over the period 2011 - 2033, equivalent to an average of 2,095 dwellings per year. This included an Objectively Assessed Need for Affordable Housing of 13,600 dwellings.¹¹

6.6 The SHMA provided a break-down OAHN for each authority, as follows:

- 16,400 dwellings in East Hertfordshire (745 per year);
- 11,300 dwellings in Epping Forest (514 per year);
- 5,900 dwellings in Harlow (268 per year); and
- **12,500 dwellings in Uttlesford (568 per year).**

¹¹ Opinion Research Services (September 2015) West Essex and East Hertfordshire Strategic Housing Market Assessment: Report of Findings <http://www.efdclocalplan.org/technical-information/>.

- 6.7 In addition, the SHMA highlighted that DCLG's 2012-based household projections showed the number of households in the HMA increasing from 175,189 to 224,827 over the 22-year period 2011-33. The SHMA explained that:

“PPG [Planning Practice Guidance] identifies that the starting point for estimating housing need is the [D]CLG 2012-based household projections. For the 22-year period 2011-33, these projections suggest an increase of 49,638 households across the West Essex and East Hertfordshire HMA: an average growth of 2,256 households each year, comprised of 779 in East Hertfordshire, 653 in Epping Forest, 326 in Harlow and 498 in Uttlesford.”

- 6.8 In August 2016, Opinion Research Services (ORS) updated the OAHN (but without undertaking a full review of the SHMA) to take into account more recent information including the DCLG 2014-based household projections and suggested a revised OAHN for the HMA of 54,608 disaggregated as follows:

- 19,427 dwellings in East Hertfordshire (883 per year);
- 13,278 dwellings in Epping Forest (604 per year);
- 7,824 dwellings in Harlow (356 per year); and
- **14,080 dwellings in Uttlesford (640 per year).**

Step 2 - Develop and appraise strategic spatial alternatives

- 6.9 In response to a need to fulfil Duty to Cooperate requirements, and to adhere to the spirit of the NPPF which requires that local authorities ‘... *demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination*¹²’ the West Essex and East Hertfordshire authorities explored options for meeting Objectively Assessed Need in the sub-region. This included the consideration of a range of locational options for delivering housing.

- 6.10 To support this process the four authorities commissioned a study which:

- identified options for spatially distributing the housing need identified in the SHMA (2015), the DCLG 2012-based household projections and the August 2016 advice from ORS across the HMA, based on an analysis of the policy context and evidence base;
- provided an evidence-based Sustainability Appraisal setting out the anticipated significant positive and negative impacts of each option (including opportunities to deliver infrastructure, employment development, regeneration benefits, etc.) and potential mitigation measures (where relevant); and
- facilitated the development of a Memorandum of Understanding (MoU) between the four authorities which sets out a high level agreement as to how new housing should be distributed across the HMA.

- 6.11 These activities are collectively referred to as the Strategic Spatial Options Study. It is anticipated that the study will provide a critical piece of evidence for demonstrating to the Planning Inspectorate at the independent examinations into the four local plans that the key strategic issue of housing growth has been robustly addressed and that the Duty to Co-operate has been clearly complied with.

- 6.12 As part of the Strategic Spatial Options Study, a range of spatial options for distributing housing across the HMA were considered. Three levels of growth were considered:

- ~46,100 new homes in line with the 2015 SHMA
- ~49,638 new homes in line with the DCLG 2012-based household projections
- ~57,400 new homes in line with early advice from ORS in light of more recent information including the DCLG 2014-based household projections (NB this figure was later revised down to 54,608 – see above)

¹² Paragraph 181, National Planning Policy Framework
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

6.13 In particular, the spatial options explored different levels of growth in and around Harlow, a key urban centre within the HMA:

- ~10,500 (lower growth)
- ~14,150 (medium growth)
- ~17,650 (higher growth)
- ~20,985 (maximum growth)

6.14 The study identified the following reasonable strategic spatial options:

- **Spatial options to deliver ~46,100 new homes across the SHMA area:**
 - A. Each authority meets its OAHN within its own boundaries (NB ~14,150 at Harlow)
 - B. Less development at Harlow and accelerated development on the A120 (NB ~10,500 at Harlow)
 - C. Less development at Harlow and two new settlements in East Herts (NB ~10,500 at Harlow)
 - D. Maximum growth at Harlow (NB ~17,650 at Harlow; reduced allocations in constrained areas of the HMA¹³)
- **Spatial option to deliver ~49,638 new homes:**
 - E. Higher growth across the HMA (NB ~17,650 at Harlow; allocations in constrained areas)
- **Spatial option to deliver ~57,400 new homes:**
 - F. Maximum growth across the HMA (NB ~ 20,985 at Harlow)

Step 3 - Identify the preferred strategy

6.15 To assist in discharging the Duty to Co-operate, the Co-operation for Sustainable Development Member Board (the Co-op Member Board) considered six options (A-F) for accommodating new housing development across the West Essex and East Hertfordshire Housing Market (HMA) area up to 2033. These six options varied in terms of: (i) the overall quantum of development to be provided for across the HMA (ranging from ~48,300 to ~56,250 new houses); and (ii) the spatial distribution of that development, in particular the amount of new housing to be accommodated in and around Harlow town. Varying the overall quantum of development allowed the Co-op Member Board to test the implications of different levels of growth including: 46,100 (the figure for objectively assessed housing need in the Strategic Housing Market Assessment, SHMA); 49,638 (a figure based on the CLG 2012-based household projections); and 54,608 (an updated OAHN figure provided by Opinion Research Services, ORS, in light of recent information including the CLG 2014-based household projections). Varying the spatial distribution of development allowed the Co-op Member Board to explore the implications of focusing different levels of development in different parts of the HMA. In particular, the options varied in terms of the level of development located in and around Harlow, the HMA's key urban centre.

6.16 The implications of the six HMA spatial strategy options (A-F) were investigated through four means:

1. Transport modelling by Essex County Council to explore their implications in relation to traffic flows and the need for road upgrades or additional highways infrastructure;
2. Sustainability Appraisal to assess their implications in relation to a range of topics including biodiversity, community and wellbeing, historic environment, landscape and water. The findings of the SA were published in 2016;¹⁴

¹³ Figures reduced across settlements in East Herts (Bishop's Stortford, Hertford, Sawbridgeworth and Ware) and Epping Forest to minimise Green Belt incursion.

3. Habitat Regulations Assessment to determine their implications, if any, for the integrity of the Epping Forest Special Area of Conservation; and
4. Strategic Site Assessment to assess the suitability of the potential sites in and around Harlow that could deliver new housing development.

6.17 In light of this investigation, the Co-op Member Board identified a Preferred Spatial Option to deliver c. 51,000 new homes across the HMA to 2033 broken down in **Table 6.1** below.

Table 6.1: The preferred broad strategy for the HMA

Local authority	Net new dwellings 2011-2033
East Hertfordshire District Council	c. 18,000
Epping Forest District Council	c. 11,400
Harlow District Council	c. 9,200
Uttlesford District Council	c. 12,500
Total across the HMA	c. 51,100
...of which the area in and around Harlow ¹⁵ will provide	c. 16,100

6.18 The preferred strategy was established drawing on evidence available at the time on the basis that:

- At c. 51,000 new homes, the planned level of housing growth is higher than both the established OAHN within the published 2015 SHMA (46,100) and the figure based on the CLG 2012-based household projections (49,638). It is lower than ORS' estimated OAHN figure taking into account recent information including the CLG 2014-based household projections (54,608) but nonetheless represents good progress towards this higher figure. Overall, the figure of c. 51,000 indicates that the four HMA authorities are positively seeking opportunities to meet the development needs of their areas in line with the National Planning Policy Framework (NPPF), and, furthermore, significantly boosting the supply of housing (NPPF, para. 47).
- Harlow represents the most sustainable location within the HMA at which to concentrate development given its role as a sub-regional centre for employment (especially in technology); its Enterprise Zone status; the need to rejuvenate the town centre; the opportunity to capitalise on its transport connections (for example, good rail links to London, Stansted Airport and Cambridge) and deliver north-south and east-west sustainable transport corridors traversing the town; its important location on the London – Stansted – Cambridge corridor; and, above all, the wider economic growth aspirations for the town. The findings and recommendation of the London Stansted Cambridge Corridor (LSCC) Growth Commission report, published in July 2016, stated that “*Broxbourne, Harlow and Stevenage have significant strategies and ambitions for growth and development. They can play an important role in supporting the Corridor’s tech and life sciences clusters. Current development and future plans will greatly improve the industrial, commercial and residential offer. These areas must be supported to provide the right types of development that enhance the quality of place for the Corridor’s knowledge-based industries and residents*” (our emphasis).¹⁶
- The transport modelling to date demonstrated that growth of between 14,000 and 17,000 new homes in and around Harlow can be accommodated provided that the mitigation measures set out in the then Draft [now signed] Highways and Transportation Infrastructure MoU for the West Essex and East Hertfordshire HMA are delivered during

¹⁴ Epping, East Herts, Harlow and Uttlesford District Councils (2016) SA of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area. <http://www.uttlesford.gov.uk/CHttpHandler.ashx?id=6626&p=0>

¹⁵ ‘in and around Harlow’ refers to development in Harlow Town as well as around Harlow in adjoining Districts.

¹⁶ London Stansted Cambridge Corridor Growth Consortium (2016). Findings and recommendation of the London Stansted Cambridge Growth Commission www.lsccgrowthcommission.org.uk/wp-content/uploads/2016/07/LSCC-Growth-Commission-Final-Report-full.pdf.

the plan period. Evidence suggested that growth beyond 2033 is likely to be possible subject to further transport modelling and the identification and delivery of additional strategic highway mitigation measures.

- The Strategic Site Assessment (AECOM, September 2016) indicated that sufficient suitable strategic sites are available in and around Harlow to deliver the figure of c. 16,100 (together with sites either already completed or granted planning permission as well as urban brownfield sites). The Strategic Site Assessment is available on the Council's Local Plan evidence-base webpage.¹⁷

6.19 A Memorandum of Understanding (MoU) was signed in March 2017 by the four Councils, and supported by Essex County Council, Hertfordshire County Council and Highways England in respect of the Distribution of Objectively Assessed Need across the West Essex/ East Hertfordshire HMA. Uttlesford made a commitment to meeting its housing need within its administrative boundaries. No neighbouring authority had approached Uttlesford at this stage and requested that it help to deliver any unmet need.

Functional Economic Market Area (FEMA)

6.20 Alongside the SHMA, the four authorities commissioned a study to consider the Objectively Assessed Economic Need of the Functional Economic Market Area (FEMA),¹⁸ which considered a wider area than that of the HMA.¹⁹ This was published in September 2015 and provided an up-to-date assessment of jobs growth need in the FEMA for the period 2011-2033. The study identified a net jobs growth per year of 1,890 for the FEMA. For the West Essex and East Hertfordshire authority areas, this translated into the following ranges in jobs growth: 435 - 505 jobs per year in East Herts; 400 - 455 jobs per year in Epping Forest; 325 - 335 jobs per year in Harlow; 665 - 675 jobs per year in Uttlesford.

'Bottom-up' considerations

Overview

6.21 The high-level evidence discussed above resulted in an understanding of the housing requirement which would need to be delivered through sites within Uttlesford District. There remained a need to develop a district-wide understanding of the capacity of the infrastructure and environment within the district as well as the site options available to deliver growth. The district level evidence at this stage is summarised below.

Gypsy and Traveller Needs

6.22 A Gypsy and Traveller Accommodation Assessment (GTAA) was carried out and published in June 2017. It concluded that no additional pitches are required in the district up to 2033 for Gypsy and Traveller households that meet the planning definition. There was also no current or future need identified for Travelling Showpeople.²⁰

Green Belt Review

6.23 The review assessed the Uttlesford Green Belt against the purposes of Green Belt as defined by the NPPF. The review was published in March 2016 and concluded that, *"all General Areas were deemed to meet Green Belt purpose either moderately or strongly. There are no General Areas which do not meet Green Belt purposes and therefore no parcels in their entirety are recommended for further consideration for release. It has been shown that the Green Belt in Uttlesford is performing an important role in terms of national policy requirements.*

At a strategic level, the northern part of the Uttlesford Green Belt plays a particularly important role in preventing sprawl (Purpose 1) and coalescence (Purpose 2) given the close relationship

¹⁷ Harlow, Epping Forest, East Herts and Uttlesford District Councils (2016) Harlow Strategic Site Assessment. Prepared by AECOM. <https://www.uttlesford.gov.uk/article/4946/Sustainability-appraisal>

¹⁸ Hardisty Jones Associates (September 2015) Economic Evidence to Support the Development of the OAHN for West Essex and East Herts <http://www.uttlesford.gov.uk/CHttpHandler.ashx?id=5438&p=0>

¹⁹ The FEMA covers the four authority areas, but also includes: Broxbourne, a fringe area comprising all of the immediately adjacent local authorities; and a link to central London.

²⁰ <https://www.uttlesford.gov.uk/article/4938/Gypsies-and-Travellers>

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

At a local level, individual parcels are responsible for protecting the Green Belt from sprawl from large built-up areas and a high proportion of the land parcels form the wider, if not the essential, gap between settlements. All parts of the Green Belt therefore are evidenced to play an important strategic role in preventing the countryside from encroachment to a large extent. Any further subdivision of these General Areas would jeopardise the role they play in maintaining settlement patterns and avoiding encroachment into open countryside. The Green Belt has contributed to the low percentage of built-form observed throughout the designated area, ensuring limited encroachment across most areas in the Green Belt. The General Areas demonstrate policy compliancy with the NPPF purposes and show a very good example of where the Green Belt is serving well across the original functions and across the different purposes".²¹

Countryside Protection Zone Study (CPZ)

6.24 The aim of Countryside Protection Zone Study (CPZ) was to assess the extent to which the land within the CPZ is meeting its purposes, as set out in Policy S8 of the adopted Uttlesford Local Plan (2005). This evidence would enable the Council to make an informed decision, should it decide to amend the CPZ through the emerging Local Plan. The study was published in June 2016 and demonstrated that:

"the majority of the CPZ is performing well against the purposes defined for it. It helps to maintain the openness of the countryside and protects its rural character and restrict the spread of development from the airport. For some parcels, particularly to the south of the airport, the CPZ plays an essential role in protecting the separate identity of individual settlements.

In summary, therefore, the CPZ is helping to maintain the vision of the 'airport in the countryside'. Unless other planning policy considerations suggest otherwise, we recommend that the CPZ is carried forward into the new Local Plan".²²

Strategic Flood Risk Assessment (SFRA)

6.25 The SFRA is a planning tool that assists in the selection of development sites away from vulnerable flood risk areas in accordance with the NPPF and its associated Planning Practice Guidance on Flood Risk and Coastal Change. The SFRA summarised the flood risk within the Areas of Search identified at the Issues and Options stage in 2015. It concluded that:

"The Areas of Search are very large, and so none of them can be ruled out on flood risk grounds; however, all of them have some local flood risk identified. Some of the settlements have already been identified by the LFRMS as Tier 2 or 3 flood risk areas, and there should be close consultation with the LLFA if these are to be taken forward. There are also several Areas of Search where development could have a significant impact on flood risk downstream if SuDS principles and strict controls on runoff are not enforced".²³

Water Cycle Study (WCS)

6.26 The WCS found no significant sewerage capacity issues and no potential "show stoppers" were identified. However, it noted that many of the sites would likely require some upgrades where necessary in order to accommodate the increased flow as a result of development. A qualitative water quality analysis indicated that the development proposed in the emerging Local Plan at this stage will not lead to a Deterioration of WFD status or will compromise the achievement of WFD Good status in the receiving watercourses.²⁴

²¹ <https://www.uttlesford.gov.uk/article/4937/Environment>

²² Ibid.

²³ Ibid.

²⁴ <https://www.uttlesford.gov.uk/article/4942/Infrastructure>

Transport Study

6.27 The study was published in December 2016; it assessed the comparative transport merits of twelve scenarios and identified two preferred scenarios to inform the development of the emerging Local Plan.²⁵ The detail of the scenarios in terms of residential development is presented in the table below.

Table 6.2: Development scenarios tested - residential details (2016)

Location/AoS	Growth Scenario										
	1	2	3	4	5	6	7	8	9	10	11
Committed Developments (Dwelling Numbers)											
Committed Developments	6,706	6,706	6,706	6,706	6,706	6,706	6,706	6,706	6,706	6,706	6,706
Garden Communities (Dwelling Numbers)											
M11 Junction 9a East	2,250				5,000						1,400
Elsenham	750	2,250	2,250		3,000	4,000	4,000				
N of A120, W of Gt. Dunmow	750	2,250		2,250	3,000	10,000		10,000		1,400	
West of Braintree	750		2,250	2,250	3,000	12,000	12,000	12,000		1,400	1,400
Market Towns (Dwelling Numbers)											
Saffron (7 sites)					840	840	840	840	1,000	700	700
Gt. Dunmow (6 sites)					720	720	720	720	900	700	700
Villages (Dwelling Numbers)											
Elsenham					40	40	40	40	70	40	40
Gt. Chesterford					200	200	200	200	200	30	30
Newport					120	120	120	120	120	30	30
Stansted Mountfitchet					140	140	140	140	180	40	40
Takeley					1,000	1,000	1,000	1,000	1,500	30	30
Thaxted					30	30	30	30	65	30	30
Clavering					14	14	14	14	31	10	10
Debden					25	25	25	25	25	10	10
Hatfield Broad Oak					8	8	8	8	38	10	10
Henham					36	36	36	36	36	10	10
Farnham					15	15	15	15	25	10	10
Felsted					230	230	230	230	230	10	10
Great Easton					40	40	40	40	40	10	10
Great Sampford					5	5	5	5	5	5	5
Quendon&Rickling					31	31	31	31	30	10	10
Stebbing					6	6	6	6	6	5	5
Radwinter										10	10
Total Dwellings	11,206	11,206	11,206	11,206	24,206	36,206	26,206	32,206	11,207	11,206	11,206

6.28 The study found that scenarios 5, 6, 7 and 8 resulted in large increases in link lengths exceeding 100% stress in comparison to the reference case²⁶. Strategic routes through the district, the M11 and A120(T), exceeded 100% stress under these scenarios in addition to numerous lower category links, most notably within Saffron Walden and the villages of Newport, Elsenham, Stansted Mountfitchet and the B1008 between Great Dunmow and Chelmsford. On the basis of these results, scenarios 5, 6, 7 and 8 were not considered further within the study as the potential level of highway mitigation required to accommodate these scenarios would be more extensive than for the other scenarios (i.e. the total length of road with greater than 100% stress is approximately double the other scenarios).

6.29 Scenario 5 includes the full build out for North Uttlesford Garden Community. This gives an indication of the potential transport issues upon completion of this Garden Community, and can inform thought around the mitigation beyond the plan period. Scenarios 6 and 8 include the full build out for Easton Park and West of Braintree Garden Communities. Similarly this gives an indication of the potential transport issues upon completion of these Garden Communities, and can inform thought around the mitigation beyond the plan period. In reality the situation will have changed dramatically by the time these communities are built out, particularly the larger developments on the A120 corridor, and the mitigation measures required will need to be adjusted as the situation develops.

6.30 The findings for the remaining scenarios were very similar with Scenario 9 resulting in the least increase in link lengths exceeding 100% stress in comparison to the reference case (48% increase). However, the study noted that Scenario 9 doesn't include the delivery of any Garden Communities and therefore spreads development across towns and villages within the district. As a result vehicle trips are more widely dispersed across the highway network within the study area with a greater proportion of trips on rural roads which, by their nature are less busy and

²⁵ <https://www.uttlesford.gov.uk/article/4947/Transport>

²⁶ Essentially the number of and length of roads exceeding predicted capacity.

- have more spare traffic capacity. Fewer links are therefore forecast to exceed 100% stress in Scenario 9.
- 6.31 Scenarios 1, 2, 3, 4, 10 and 11 were found to result in an increase of between 50% to 58% in comparison to the reference case and the pattern of links exceeding 100% stress was found to be similar in these scenarios.
- 6.32 Key differences were identified for Scenarios 2 and 3 as they both included significant new residential development in Elsenham (2,250 dwellings in each scenario). The results forecast that sections of the B1051, Hall Road and the B1383 through Elsenham and Stansted Mountfitchet exceed 100% stress with stress values of up to 225%.
- 6.33 Overall, the study concluded that in link stress terms there is little to differentiate between Scenarios 1 and 11. There was also little to differentiate between scenarios 4 and 10. The study identified scenarios 10 and 11 as preferred as scenarios 1 and 4 were considered unrealistic in planning terms as there is zero growth proposed in the towns and villages.
- 6.34 Following a number of appeal decisions the reference case was update in late 2016. There were also minor revisions to the distribution of employment floorspace under scenarios 10 and 11. An additional scenario was also developed to ensure that all options for the spatial distribution of Garden Communities had been addressed. The new scenario 12 was a slight variation on scenarios 10 and 11 already assessed, with Garden Communities assumed at Great Chesterford and west of Great Dunmow, with no Garden Community west of Braintree.

Table 6.3: Revised development scenarios tested - residential details (2016)

Location/AoS	Growth Scenario		
	10	11	12
Committed Developments (Dwelling Numbers)			
Committed Developments	5,916	5,916	5,916
Garden Communities (Dwelling Numbers)			
M11 Junction 9a East (Gt Chesterford)		1,400	1,400
Elsenham			
N of A120, W of Gt. Dunmow	1,400		1,400
West of Braintree	1,400	1,400	
Market Towns (Dwelling Numbers)			
Saffron (7 sites)	700	700	700
Gt. Dunmow (6 sites)	700	700	700
Villages (Dwelling Numbers)			
Elsenham	40	40	40
Gt. Chesterford	30	30	30
Newport	30	30	30
Stansted Mountfitchet	40	40	40
Takeley	30	30	30
Thaxted	30	30	30
Clavering	10	10	10
Debden	10	10	10
Hatfield Broad Oak	10	10	10
Henham	10	10	10
Farnham	10	10	10
Felsted	10	10	10
Great Easton	10	10	10
Great Sampford	5	5	5
Quendon&Rickling	10	10	10
Stebbing	5	5	5
Radwinter	10	10	10
Total Dwellings	10,416	10,416	10,416

- 6.35 The assessment found that in terms of link stress there is no difference between the revised scenario 11 and the new scenario 12. This is because both scenarios focus development at

Great Chesterford and on the A120(T) corridor either west of Great Dunmow or west of Braintree. Revised scenario 10 results in greater impacts on the A120(T) corridor with lower impacts on roads within the study area immediately to the north of the district within South Cambridgeshire. Whereas scenarios 11 and 12 result in lower impacts on the A120(T) and higher impacts on roads in the vicinity of Great Chesterford including the A505 and the A1301 which are both within South Cambridgeshire. Of the three scenarios 10 results in the least total link length within the study area exceeding 100% stress and was therefore identified as the most favourable in traffic impacts terms.

- 6.36 Given the update to the SHMA in 2017 it was considered prudent to undertake further assessments to test the impacts of higher growth scenarios. A further 16 development scenarios were identified and assessed and they are set out in the table below.

Table 6.4: New development scenarios tested (2017)

Scenario No.	Summary of Residential Spatial Distribution	Total Dwellings	Total Employment (sqm)
13	West of Great Dunmow; West of Braintree	10,416	171,250
14	Little Dunmow; Great Chesterford	10,416	203,104
15	Little Dunmow; West of Great Dunmow	10,416	190,084
16	North of Takeley; Great Chesterford	10,416	177,520
17	West of Great Dunmow; Takeley	10,416	164,500
18	Great Chesterford; West of Great Dunmow; West of Braintree	13,026	222,250
19	Great Chesterford; West of Great Dunmow; West of Braintree	13,026	214,000
20	Great Chesterford; West of Great Dunmow; West of Braintree	12,676	223,000
21	Great Chesterford; West of Braintree; Takeley (NE)	12,426	207,400
22	West of Braintree; Takeley; Little Dunmow	12,576	204,205
23	West of Great Dunmow; West of Braintree; Little Dunmow	13,226	211,255
24	Great Chesterford; Takeley; Little Dunmow	12,476	223,360
25	Great Chesterford; West of Great Dunmow; Little Dunmow	12,776	231,160
26	West of Great Dunmow; Takeley (NE); Little Dunmow	13,176	205,405
27	Great Chesterford; West of Great Dunmow; Takeley	13,276	223,450
28	Great Chesterford; West of Great Dunmow; Takeley	11,526	198,862

- 6.37 Scenarios 13 to 17 represent development scenarios totalling 12,500 dwellings within the district, whereas scenarios 18 to 28 represent development scenarios totalling 14,100 dwellings. As a result, any comparison between the results therefore needs to take this into account. Furthermore, the addendum states that a direct comparison between the results presented within it and the earlier results presented in the Transport Study Report (2016) is not possible due to significant changes to the reference case assumptions between the assessments.
- 6.38 The assessment found that for all scenarios (13 to 28 inclusive), the total length of links exceeding 100% was very similar with only a few percentage points difference.

Essex County Council Transport Study

- 6.39 Essex County Council prepared a separate study 'The UDC Transport study/Saffron Walden Transport Assessment 2013/14 [updated 2017]' that looked at the more detailed traffic impacts of development on the transport network including with respect to the towns of Saffron Walden and Great Dunmow.

- 6.40 For Saffron Walden, the study assessed potential development options to the east of the town 'with' and 'without' a possible new link road to help alleviate traffic movements through the town. The 2017 update to the study identified that the link road would now be challenging to deliver and would, in any event, be unlikely to deliver enough traffic relief to allow significant development to the east of the town to proceed without detrimental traffic impacts.
- 6.41 Deliverable improvements to the Peaslands Road corridor were identified that would help to provide increased opportunities for traffic to avoid the centre. With these in place a development of circa 150 dwellings could be accommodated (on SLAA site 07SAf15) with acceptable impacts (Subject to an appropriate transport assessment/ air quality assessment as part of the normal planning application process). Beyond this scale of development more sophisticated modelling would be required to justify development in terms of impacts.

Infrastructure Delivery Plan

6.42 The Infrastructure Delivery Plan (IDP) seeks to address what infrastructure is required as a result of the likely scale and distribution of future growth in the district. It found that there are some key challenges and risks to growth associated with the need for new physical and social infrastructure in the district.²⁷ These include:

- An improved Junction 8 is considered a critical piece of infrastructure and until it is in place, represents a risk to growth.
- Access from areas of growth to the strategic highway network:
 - Upper levels of growth would place pressure on the road network in Saffron Walden, exceeding capacity at a number of junctions during the plan period.
 - Improvements to the road network in Great Dunmow, primarily in and around the town centre, may be needed in the plan period.
 - Growth at Great Chesterford will likely exacerbate pressure on the A505 (in South Cambridgeshire). Improvements to the A505 are however required with or without Great Chesterford coming forward as a new garden community and so is not seen as a constraint to development.
 - Birchanger, which is located in close proximity to M11 junction 8, would generate adverse impacts on the M11 and A120.
 - The current permitted scale of growth at Stansted Airport can be accommodated within the interim solutions to M11 Junction 8. However, additional junction improvements would be required for any further growth (over and above 35MPPA).
 - Although access from the A120 into the proposed garden settlement at Easton Park is considered achievable, the current scheme being promoted only shows a single point of access to serve a new settlement of 10,000 new homes. As a minimum, two access points will be required, which will help ensure network resilience. 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.
 - Access to promoted development at Elsenham is considered difficult to achieve given the complexities associated with access to the M11 (a new junction might be needed but would be difficult to deliver) and the A120 (which would be convoluted given the need to route around Stansted Airport). It thus presents a major risk to development in this location.
 - Further growth at Takeley would be difficult to achieve given additional pressures that would be placed on M11 Junction 8. This is a risk to development at this location.
 - Access to the strategic road network from the proposed Chelmer Mead garden settlement is considered difficult to achieve, with no direct links to the A120 possible. This is a risk to development in this location.

²⁷ Troy Planning on behalf of Uttlesford District Council (2017) Infrastructure Development Plan. <https://www.uttlesford.gov.uk/article/4942/Infrastructure>

- Access to the A120 from the proposed West of Braintree new garden community is considered feasible, though does require the two separate proposals (Boxted Wood and Andrewsfield) to be considered together and impacts on the A120 at Great Dunmow to be further assessed.
- Upgrades will be required to the foul sewerage network and major upgrades and new water supply infrastructure will be required for the new garden communities.
- There are challenges in terms of education infrastructure in Thaxted and Takeley where scope to expand existing schools is limited. These settlements also pose challenges for secondary school needs generated from development as pupils would need to travel away from the towns for schooling. Elsewhere, extensions of existing secondary schools will be required, which could be challenging in Saffron Walden and Great Dunmow where existing school sites are constrained. Education provision within the proposed GCs could help provide for needs.

New Settlement: Landscape and Visual Impact

6.43 This paper examined the significance and the effects of change resulting from the development of a new settlement on the landscape and on public views and visual amenity. The paper considered North Uttlesford (Great Chesterford), Elsenham, Takeley, Easton Park, Little Dunmow (Chelmer Mead) and West of Braintree.²⁸

Ecological Sites on and adjacent to New Settlement/ Neighbourhood Proposals

6.44 This paper identified the sites designated for their ecological importance within and adjoining the new settlement/neighbourhood sites, including: North Uttlesford (Great Chesterford), Elsenham, Takeley, Easton park, Little Dunmow (Chelmer Mead) and West of Braintree.²⁹

Brief Heritage Impact Assessments

6.45 This paper identified designated heritage assets that could potentially be impacted by development at sites being promoted for a new settlement, including: North Uttlesford (Great Chesterford), Elsenham, Takeley, Easton park, Little Dunmow (Chelmer Mead) and West of Braintree.³⁰ It considers the significance of these heritage assets, the contribution that setting makes to their overall significance and the likely effect of the proposed development on their setting and overall significance.³¹

Employment Land Review

6.46 An Employment Land Review (ELR) was first carried out in 2011. It was subsequently updated in 2016 and then again in 2017.³² The ELR update assessed the quantity and quality of the district's employment land and forecasted future land and floorspace requirements.

6.47 The ELR update in 2017 found that the district is set to see a net requirement for both office floorspace and industrial land over the Plan period to 2033 which points towards a need to retain the current stock of employment land whilst exploring opportunities to both consolidate poorly performing sites and promote new sites for development. It recommended that the Council should look to promote new development within existing clusters (where appropriate) within vacant and derelict land or through the intensification of inefficiently used sites. These sites should be selected based on their proximity to public transport, links to strategic transport corridors and nodes, access to markets and an appreciation of existing constraints which may hinder growth opportunities. The ELR then included suggestions for employment cluster retention, designation and release.

Economic Viability Study

6.48 Economic viability assessments were carried out for eight New Settlement/Neighbourhood proposals and seventeen residential allocations put forward by promoters/developers in the Call for Sites. The assessment concluded that all of the proposed new settlements and

²⁸ <https://www.uttlesford.gov.uk/article/4937/Environment>

²⁹ Ibid.

³⁰ Ibid.

³¹ Ibid.

³² AECOM on behalf of Uttlesford District Council (2017) Employment Land review Update. <https://www.uttlesford.gov.uk/article/4936/Employment>

seventeen residential allocations are financially viable and therefore able to be delivered over the Local Plan period if allocated.³³

Strategic Land Availability Assessment (SLAA)

6.49 The main piece of evidence used to help determine whether the identified housing needs for the district can be met is the Strategic Land Availability Assessment (SLAA). This identifies the availability and suitability of sites across the district with the potential to accommodate housing and employment as well as other uses. The SLAA is a 'live' document and is updated annually by the Council.

6.50 The SLAA involved five stages, as per the methodology proposed in the PPG, and these are summarised below. For further detail please refer to the SLAA Methodology published in 2015.³⁴

Stage 1 - Site/ broad locations identification

6.51 The Council undertook a Call for Sites between April and June 2015, The 'Call for Sites' was an opportunity for developers, landowners, individuals and other interested parties to suggest sites within Uttlesford District for development. It should be noted that, in accordance with the NPPG, the SLAA only considered those sites that were identified as being capable of delivering five or more dwellings or economic development at a minimum size of 0.25ha (or 500sqm net additional floorspace) or above, or Gypsy and Traveller sites which could accommodate 1 or more pitches. Sites falling below this threshold are considered potential windfall sites and were not included in the SLAA other than as part of the windfall allowance in the housing trajectory.

6.52 As part of this stage, the Council reviewed a range of different sources of information to identify as wide a range as possible of sites as well as broad locations for development. All sites submitted at this point, regardless of constraints, were included at this stage for the sake of comprehensiveness.

Stage 2 - Site/ broad location assessment

6.53 The suitability, availability and achievability of sites and broad areas were then assessed and a judgement made in the plan-making context as to whether a site could be considered deliverable.

6.54 The council assessed the suitability of each site by considering its location against the following factors:

- Policy constraint
- Flood risk
- Noise Pollution
- Natural environment
- Historic environment
- Accessibility
- Other land uses on the site

6.55 It should be noted that any housing sites allocated in existing development plans, or sites with planning permission for residential development were considered suitable for housing development.

6.56 In terms of availability, all sites were assessed to determine if they were genuinely available i.e. there were no legal or ownership problems, such as ransom strips, multiple ownerships, tenancies or operational requirements of land owners. A site was considered achievable if there was a reasonable prospect that development could take place at a particular point in time.

³³ <https://www.uttlesford.gov.uk/article/4941/Housing>

³⁴ Uttlesford District Council (2015) Strategic Land Availability Assessment Methodology [online] available at: https://www.uttlesford.gov.uk/media/5661/Strategic-Land-Availability-Assessment-2015-Housing-and-employment-Land-Methodology/pdf/SLAA_2015_methodology_Final.pdf

This involved a high-level judgement about the economic viability of a site and the capacity of the developer to complete the housing over a certain period.

- 6.57 Where constraints were identified, the assessment considered what action would be needed to remove them, along with when and how this could be undertaken and the likelihood of sites/broad locations being delivered.

Stage 3 - Windfalls

- 6.58 The term “windfall” refers to sites which have not been previously identified but which come forward for development nonetheless. The NPPF and NPPG advise that, where justified, windfall sites can contribute towards housing supply. The SLAA identified a windfall allowance of 50 dwellings per year and this is reviewed annually.

Stage 4 - Assessment Review

- 6.59 Once all the sites and broad locations have been assessed, the development potential of all the sites was considered and an assessment made as to whether there are sufficient or insufficient sites/broad locations to meet objectively assessed needs.

Stage 5 - Final Evidence Base

- 6.60 The final stage is essentially the core outputs from the assessment including the SHLAA document, which are available to view and download on the Council’s website as part of the wider evidence base for the emerging Local Plan.
- 6.61 The SLAA Update Topic Paper March 2017 found 353 sites were submitted with a theoretical potential of circa 18,000 dwellings. This included a range of sizes and locations including major proposals at Takeley. These options were tested in the heritage, landscape, accessibility, and transport evidence base documents. The SLAA also showed limited opportunities for expansion of the main towns and villages in the district without a detrimental impact on the character of the settlements (including their historic character, landscape setting and physical form), the countryside, the highway network, and services and facilities (e.g. schools and health services).

SA of site options

- 6.62 Reasonable site options submitted through the call for sites process and considered through the SLAA were appraised through the SA process in 2017. A number of site options were excluded from the SA process at this stage for several of reasons. Planning Advisory Service (PAS) guidance states that potential sites - identified for example through a SLAA - should be progressively filtered until a 'short list' of reasonable sites options is generated. In filtering sites, you can use three broad sets of criteria. If sites don't satisfy these criteria they aren't 'reasonable' alternatives and should be discounted:

- Exclusionary criteria - e.g. flood risk areas, areas of outstanding natural beauty (AONB) and green belt (taking into account Section 9 of the NPPF (paras 79-92)) and areas outside the pattern of development set out in the strategy.
- Discretionary criteria - e.g. relating to public rights of way, agricultural land, local nature conservation designations etc. which might not lead to the exclusion of a site but would be important from a sustainability perspective and should influence the decision as to whether or not a site is taken forward (and, if it is, the conditions that might be attached to any development).
- Deliverability criteria - e.g. land ownership, access, planning history, viability, size etc. all of which may have a bearing on whether or not the site is deliverable as a location for development.'

- 6.63 At this stage in the SA process these reasons amounted to the following:

- The position of the settlement within the Settlement Hierarchy. Housing sites within or adjoining settlements that do not fall within the District’s Towns, Key Villages or Type A-B Villages (the Countryside as defined within the Plan) were not considered.
- The yield or size of the site is too small to allocate in a strategic Plan (these sites can be considered more of a development management/ control matter). The threshold was set

at under 10 dwellings. These sites were classified as windfall sites within the plan, and were not been identified for specific allocation.

- Sites that were identified as unsuitable, unachievable or undeliverable/ undevelopable in the SHLAA.

6.64 Site options that passed through these criteria were considered to be reasonable and were appraised against a number of SA criteria linked to the SA Framework. The criteria were set out in Annex C and the findings presented in Appendix 2 of the SA Report published alongside the Preferred Options Document in June 2017.³⁵ N.B. The plan-making and SA process has moved on and as a result the findings of the SA for site options at this stage are not included within this SA Report. A fresh GIS analysis of all site options was carried out to reflect current evidence. The findings of this work are presented in **Appendix IV**.

Consideration of Windfall Allowance

6.65 The purpose of this report was to re-examine the methodology and evidence for a windfall allowance. It considered the delivery of windfall sites over from 2006/7 to 2015/16. It concluded that there is evidence to justify including a windfall allowance of 70 dwellings per annum in the overall housing supply as well as the housing trajectory and 5-year supply.³⁶

Refining the spatial strategy alternatives in 2016/17

6.66 Following a review of the consultation responses received on the Issues and Options Document and accompanying SA Report, a Full Council meeting was held on 21st March 2016.³⁷ During this meeting it was confirmed that a new settlement (or new settlements) should continue to be investigated and analysed alongside all other possible options for housing and employment distribution and should not be dismissed at this stage. It was noted that the delivery of homes in a new settlement would be low in the early stages of the plan period and then a more significant supply would come on stream later in the plan period. At this stage it was considered that new settlement[s] could potential deliver 2,000 homes during the plan period.

6.67 Evidence on supply demonstrated that there was already a significant level of built and/ or committed development at the towns, in particular Great Dunmow, and at a number of the villages during the plan period.³⁸

6.68 The SHLAA and wider evidence base documents showed that there were limited opportunities for expansion of the main towns and villages in the district without a detrimental impact on the character of the settlements (including their historic character, landscape setting and physical form), the countryside, the highway network, and services and facilities (e.g. schools and health services).

6.69 The evidence also demonstrated that there is no justification for the release of Green Belt land in the south and south east of the district. This includes areas around the edge of Bishop's Stortford, the south of Stansted Mountfichet and around the villages of Birchanger and Hatfield Heath. A study published in June 2016 also showed that the Countryside Protection Zone (CPZ) around Stansted Airport is still fulfilling its purposes and should be maintained.

Development scenarios

6.70 The Issues and Options consultation proposed seven different development scenarios for housing growth; four based on the Council's Objectively Assessed Housing Need (OAHN) of 580 dwellings per annum and three on a higher figure of 750 dwellings, to test the implications of greater growth. There was some duplication between scenarios (i.e. the two options of new settlement or settlements and a hybrid were used for the lower and higher housing figure), so as a result the scenarios were refined/ consolidated at this stage to the following:

³⁵ <https://www.uttlesford.gov.uk/article/4946/Sustainability-appraisal>

³⁶ <https://www.uttlesford.gov.uk/article/4941/Housing>

³⁷ <https://uttlesford.moderngov.co.uk/Data/Council/201603211930/Agenda/Document%202.pdf>

³⁸ Uttlesford District Council (April 2016) Housing Trajectory. <https://www.uttlesford.gov.uk/article/4941/Housing>

1. All development allocated in new settlement(s);
2. All development pepper potted in villages;
3. All development in the two main towns (Saffron Walden and Great Dunmow);
4. Combination of development in main towns and villages; and
5. Hybrid involving new settlement(s), main towns and villages.

6.71 There was a Full Council Meeting on 26th July 2016 that considered the five development scenarios above and sought to identify a preferred approach based on the emerging evidence base, responses to the Issues and Options consultation and the findings of the SA work to date.³⁹ The report to Full Council noted that a cross-party Member workshop had been held on 28th June 2016, which had considered the overall benefits and risk of the scenarios. These benefits and risks are summarised in the table below.

Table 6.5: Development scenario risks and benefits presented to Full Council on 28th June 2016

Benefits	Risks
1) All development allocated in new settlement(s)	
<ul style="list-style-type: none"> • Comprehensively plan the provision of infrastructure • Critical mass to provide additional infrastructure • Reduces development pressure on the historic settlements 	<ul style="list-style-type: none"> • Relying on only 1 or 2 large sites to deliver the housing • Deliverability within the Plan period • Deprives other settlements of sustainable growth • Negative impact on 5 year land supply
2) All development pepper potted in villages	
<ul style="list-style-type: none"> • Sustains village vitality 	<ul style="list-style-type: none"> • Scale of development is likely to have a detrimental impact on their character, the countryside and the highway network in many circumstances • Uncertainty that the scale of individual developments would provide the infrastructure required - Infrastructure deficit
3) All development in the two main towns (Saffron Walden and Great Dunmow)	
<ul style="list-style-type: none"> • Generally sustainable locations for development • Supports existing services and facilities • Help improve infrastructure deficit 	<ul style="list-style-type: none"> • Significant impact on their historic character and landscape setting • Restriction of the pooling of S106 for infrastructure. • Insufficient deliverable sites
4) Combination of development in main towns and villages	
<ul style="list-style-type: none"> • Towns are generally sustainable locations for development • Sustains village vitality and diversity 	<ul style="list-style-type: none"> • Some villages are more constrained than others – could result in disproportionate growth • Uncertainty that the scale of individual developments would provide the infrastructure required - Infrastructure deficit
5) Hybrid involving new settlement(s), main towns and villages	
<ul style="list-style-type: none"> • Towns are generally sustainable locations for development, • Provides an opportunity for some growth to sustain village vitality in the most sustainable locations • New settlements allows us to provide for the highest level of infrastructure demands and comprehensively meet development needs • Reduces development pressure on the historic settlements • Helps to maintain a 5 year supply of housing • It can lessen the impact on the highway network 	<ul style="list-style-type: none"> • Similar to scenarios 1-4 but to a lesser degree • Loss of countryside • Development may have detrimental impact on historic character of existing settlements

³⁹ <https://uttlesford.moderngov.co.uk/Data/Council/201607261930/Agenda/Document%204.pdf>

Benefits

Risks

- 6.72 Full Council, on the basis of the above benefits and risks, the emerging evidence base and the findings of the SA agreed that that the preferred strategy for the Local Plan should be Scenario 5 - the Hybrid Distribution Strategy - New Settlement(s), Main Towns and Villages.
- 6.73 Outline reasons for the rejection or progression of distribution scenarios at this stage are provided in **Table 6.6** below.

Table 6.6: Outline reasons for selection/ rejection of distribution scenarios in 2016

Scenario	Outline reasons
1) All development allocated in new settlement(s)	The Scenario is not considered a sound distribution strategy as it would lead to the overreliance on large sites to deliver the housing and there would be issues surrounding deliverability within the Plan period. Furthermore, it deprives other settlements of sustainable growth, and there would be negative impact on five year land supply. For these reasons this scenario was rejected.
2) All development pepper potted in villages	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, this scenario was rejected.
3) All development in the two main towns (Saffron Walden and Great Dunmow)	The scenario would be likely to have significant impacts on historic character and landscape setting of the towns as well as the highway network. It would restrict the pooling of sites for infrastructure, and there are also insufficient deliverable sites to meet identified needs as submitted through the Call for Sites process. For these reasons, this scenario was rejected.
4) Combination of development in main towns and villages	The main towns and villages already have a significant level of built and committed development during the plan period. This scenario would require large-scale growth at the villages, which could result in disproportionate growth, and there would be an uncertainty that the scale of individual developments would provide the infrastructure required. There is also the potential for significant impacts on historic character and landscape setting of the villages. For these reasons this scenario was rejected.
5) Hybrid involving new settlement(s), main towns and villages	The scenario would allow for appropriate development at sustainable locations in the district as well as providing an opportunity for limited growth in villages to sustain the vitality of sustainable villages. While new settlements could comprehensively meet development needs and provide significant levels of new infrastructure. A hybrid strategy would reduce pressure on existing settlements, maintain a five year supply of housing and lessen the impact on the highway network.

Scale of housing growth

6.74 At this stage, the Council explored some separate alternatives for the overall scale of growth and made assumptions around how this would affect the number of new settlements required during the plan period. The following options were identified (with associated assumptions in terms of delivery related to any new settlement providing a maximum 1,400 homes over the plan period based on expected start-dates and delivery rates):

- SP3(a): A higher indicative figure than that within the SHMA (>14,100 dwellings from 2011-2033, specified as 15,500) - In order to deliver this quantum, the district would require the allocation of four new Garden Communities.
- SP3(b): The lower end of the OAHN 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.
- SP3(c): A lower indicative figure than that of the lower OAHN figure (<12,500 dwellings from 2011-2033) - In order to deliver this quantum, the district would require the allocation of one new Garden Community.
- 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 would be anticipated that the district would not need to allocate any new Garden Communities.

6.75 Each of the options identified above were subject to appraisal through the SA process. The findings of this work were presented in Chapter 5 of the SA Report that accompanied the Regulation 18 (Draft) Local Plan on Consultation from July to September 2017.⁴⁰

⁴⁰ <https://www.uttlesford.gov.uk/article/4946/Sustainability-appraisal>

- 6.76 The SA Report noted that the options that would deliver less than the OAHN could not be considered as reasonable alternatives but were nevertheless included for comparative purposes. The appraisal found that while the higher growth options are likely to result in positive effects of greater significance for SA Objectives relating to housing, communities and accessibility they are also more likely to have negative effects against SA Objectives relating to biodiversity, the landscape and pollution.
- 6.77 Outline reasons for the rejection or progression of the options for the scale of housing growth at this stage are provided in **Table 6.7** below.

Table 6.7: Outline reasons for selection/ rejection of scale and distribution options in 2016/17

Scenario	Outline reasons
SP3(a): A higher indicative figure than that within the SHMA (>14,100 dwellings from 2011-2033, specified as 15,500) - In order to deliver this quantum, the district would require the allocation of four new Garden Communities.	Four new Garden Communities was discounted as an option as it would lead to increased environmental effects in the Plan area. Additionally, no currently rejected Garden Community option has been deemed a sustainable option for allocation due to insurmountable issues/ an inability for benefits to outweigh constraints.
SP3(b): The lower end of the OAHN 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.	This alternative was rejected as it would not meet the District's Objectively Assessed Housing Need (OAHN) for housing within the Plan period.
SP3(c): A lower indicative figure than that of the lower OAHN figure (<12,500 dwellings from 2011-2033) - In order to deliver this quantum, the district would require the allocation of one new Garden Community.	This alternative was rejected as it would not meet the District's Objectively Assessed Housing Need (OAHN) for housing within the Plan period.
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 would be anticipated that the district would not need to allocate any new Garden Communities.	This alternative was rejected as it would not meet the District's Objectively Assessed Housing Need (OAHN) for housing within the Plan period.

Garden Communities

- 6.78 At this stage there was a need to explore potential options for new settlements in more detail. The SHLAA and wider evidence base documents demonstrated that there were limited opportunities for expansion of the main towns and villages in the district without a detrimental impact on the character of the settlements (including their historic character, landscape setting and physical form), the countryside, the highway network, and services and facilities (e.g. schools and health services).
- 6.79 As a result, the preferred approach for the distribution of housing growth included the delivery of one if not more new settlements to ensure that housing needs are met during the plan period.
- 6.80 The call for site process and the SHLAA allowed the Council at this stage to translate the AoS for new settlements identified in 2015 into more focused, site specific options that could potentially deliver new Garden Communities.
- 6.81 **Table 6.8** indicates whether sites for large scale growth were submitted through the Call for Sites process within an identified AoS for a new settlement.

Table 6.8: New settlement options submitted within the previously explored Areas of Search

New Settlement Areas of Search	Promoted site/ area	Suitable land submitted for strategic growth?
AoS 1: M11 Junction 9a - East	Great Chesterford/ North Uttlesford	Yes
AoS 2: M11 Junction 9a - West	N/A	No
AoS 3: Elsenham area	Elsenham	Yes
AoS 4: M11 Junction 8 - North-west	Birchanger	Yes
AoS 5: M11 Junction 8 - South-east	N/A	No
AoS 6: South of A120, North of Hatfield Forest	Takeley	Yes
AoS 7: North of A120, West of great Dunmow	Easton Park	Yes
AoS 8: South of the A120	N/A	No
AoS 9: West of Braintree	West of Braintree	Yes

- 6.82 In addition to the six options identified above, a further site/ area was submitted for consideration as a Garden Community (GC) through the call for sites process that fell outside the AoS. This option, south of the A120 and east of Little Dunmow was referred to as 'Chelmer Mead' at the time.
- 6.83 The seven identified options were as follows (with SHLAA reference number):
- Easton Park (06LtEas15)
 - Great Chesterford (10Gte15)
 - West of Braintree (05Ste15 and 06Ste15)
 - Takeley (13Tak15 and 11Tak15)
 - Elsenham (07Els15)
 - Birchanger (05Bir15)
 - Chelmer Mead (03LtDun14)
- 6.84 The Council recognised at this stage that some of the submitted sites were not of a sufficient scale to deliver the minimum threshold of 5,000 dwellings, which could provide a new secondary school (as per ECC comments on the Issues and Options Document). Despite this, these sites (including Takeley, Elsenham, Birchanger and Chelmer Mead) were carried forward for further consideration as they were being actively promoted and in order to ensure that all potential options were explored.
- 6.85 An independent SA of the seven GC options was carried out by Place Services and sent to the Council in October 2016. The appraisal looked at the sustainability effects of development within specific areas of land as they were submitted, and whether they were suitable in line with Garden City Principles using a sustainability framework developed relevant to proposals of such a scale. The framework was presented in Annex C and the findings of the appraisal were presented in Chapter 8 of the SA Report that accompanied the Regulation 18 (Draft) Local Plan on consultation from July to September 2017.⁴¹
- 6.86 The findings of the SA work informed the production of a Reasonable Alternatives Identification Note (December 2016). This note was prepared by an independent consultant (Troy Planning) to explore what could be considered reasonable in meeting identified housing needs based on some assumptions regarding start dates and delivery rates of GCs.

⁴¹ <https://www.uttlesford.gov.uk/article/4946/Sustainability-appraisal>

6.87 The note recommended that two of the site options for a new settlement should not be considered further in plan-making for a number of reasons:

- **Elsenham** - Following the previous conclusions of the Inspector with respect to the withdrawn 2014 Uttlesford Local Plan and the then recently dismissed Planning Appeal upon a portion of the site. Constraints to be overcome as part of a strategy to achieve sustainable development appeared insurmountable within the plan period.
- **Birchanger** - The site is located within the Green Belt and would require the Council to demonstrate exceptional circumstances justifying Green Belt release. Discussion with Officers indicated that the scale of delivery in the first instance would comprise a potential 'village extension' of c.800 units, which is inconsistent with the functions of a 'new settlement' within the preferred 'hybrid' strategy.⁴²

6.88 For the remaining five GC options the note identified indicative capacities, which are provided in the table below.

Table 6.9: Garden Community options

Column heading	Best case during plan period	Alternative case - c. 50% of best case	Total site capacity based on submitted details
1. Great Chesterford	2,250 (1a)	1,125 (1b)	5,000
2. Easton Park	2,300 (2a)	1,150 (2b)	10,000
3. West of Braintree	600 (3a)	N/A	12,000
4. Takeley	1,700 (4a)	850 (4b)	1,700
5. Chelmer Mead	2,700 (5a)	1,500 (5b)	2,700

6.89 At this point the Council considered that it would be appropriate to explore potential combinations of the five GC options. In December 2016 eleven scenarios were identified to test the delivery of the identified housing quanta of 14,100 dwellings, which represented the OAHN for the District at that time.

6.90 A twelfth scenario was included that did not meet the OAHN. This scenario was included for comparison purposes but was not considered to be a 'reasonable alternative'. Another scenario (Option 5) was removed from consideration due to viability concerns surrounding any scenario that explored less than the full proposal at Great Chesterford. As a result, the scenarios below are referenced 1-4 and 6-13 in **Table 6.10** below.

⁴² N.B. The strategic implications for development in this location were broadly assessed within the context of the SA process for the Housing Market Area.

Table 6.10: Garden Community Scenarios

Option	Site A	Site B	Site C	Total (including 'constant' components (9,854 dwellings))
Option 1	1a - Great Chesterford (2,500)	2a - Easton Park (2,300)	3a - West of Braintree (600)	5,400 (15,254)
Option 2	1a - Great Chesterford (2,500)	3a - West of Braintree (600)	4a - Takeley (1,700)	4,800 (14,654)
Option 3	1a - Great Chesterford (2,500)	3a - West of Braintree (600)	5a - Chelmer Mead (2,700)	5,800 (15,654)
Option 4	1a - Great Chesterford (2,500)	3a - West of Braintree (600)	5b - Chelmer Mead (1,500)	4,600 (14,454)
Option 6	2a - Easton Park (2,300)	3a - West of Braintree (600)	4a - Takeley (1,700)	4,600 (14,454)
Option 7	2a - Easton Park (2,300)	3a - West of Braintree (600)	5a - Chelmer Mead (2,700)	5,600 (15,454)
Option 8	2a - Easton Park (2,300)	3a - West of Braintree (600)	5b - Chelmer Mead (1,500)	4,400 (14,254)
Option 9	2b - Easton Park (1,150)	3a - West of Braintree (600)	5a - Chelmer Mead (2,700)	4,450 (14,304)
Option 10	3a - West of Braintree (600)	4a - Takeley (1,700)	5a - Chelmer Mead (2,700)	5,000 (14,854)
Option 11	3a - West of Braintree (600)	4b - Takeley (850)	5a - Chelmer Mead (2,700)	4,150 (14,004)
Option 12	1a - Great Chesterford (2,500)	2b - Easton Park (1,150)	3a - West of Braintree (600)	4,250 (14,104)
Option 13	1a - Great Chesterford (2,500)	3a - West of Braintree (600)	4b - Takeley (850)	3,950 (13,804)

- 6.91 The GC scenarios identified above were subject to appraisal through the SA process in January 2017. The findings of this work were presented in Appendix 1 of the SA Report that accompanied the Regulation 18 (Draft) Local Plan on consultation from July to September 2017.⁴³
- 6.92 In February 2017 a workshop was held with members of the Council's Planning Policy Working Group to brief them on the further work on GC options and scenarios, including the findings of the SA work. The content of the workshop was summarised in a Topic Paper - Identification of Reasonable Alternatives for the Uttlesford Local Plan 2011-2033 that was considered by the Planning Policy Working Group on 6 April 2017.
- 6.93 As stated earlier, the evidence base demonstrated that there were limited opportunities for expansion of the main towns and villages in the district without a detrimental impact on the character of the settlements (including their historic character, landscape setting and physical form), the countryside, the highway network, and services and facilities (e.g. schools and health services).
- 6.94 Given the predicted delivery rates of the new settlement options, it would not be possible to rely on just one or two new settlements to help meet the residual housing requirement during the plan period. Failure to meet these delivery rates could place additional pressure on the other, existing towns and villages in the district. Consequently, it was considered that it was necessary to consider combinations of three new settlements. This was considered to provide for the housing need whilst reflecting realistic assumptions for housing delivery. Three new settlements were considered to provide contingency and flexibility in terms of start dates and delivery rates. It was also noted at the workshop that the evidence base for the Local Plan

⁴³ <https://www.uttlesford.gov.uk/article/4946/Sustainability-appraisal>

provided limited grounds to increase allocations elsewhere, in particular at the other towns and villages. It was agreed at the workshop that it would be helpful to receive presentations from each of the new settlement site promoters to inform further consideration of the reasonable alternatives. Subsequently Developer Presentation Evenings were held for each site in March 2017.

- 6.95 The overall conclusion was that only three of the five options were of sufficient scale to be Garden Communities with the potential to be sustainable. Outline reasons for the rejection or progression of Garden Community options at this stage are provided in **Table 6.11** below.

Table 6.11: Outline reasons for selection/ rejection of Garden Community options in 2017

GC options	Outline reasons
West of Braintree	Land west of Braintree is considered a sustainable location due to good access onto the A120 and its proximity to service and facilities in Braintree.
Easton Park	Easton Park is considered a sustainable location due to its proximity to Stansted Airport and the potential for sustainable transport links to the airport and to Great Dunmow and good access onto the A120.
North Uttlesford (Great Chesterford)	The site at Great Chesterford benefits from its proximity to M11 Junction 9 and Great Chesterford Railway Station; as well as access to biomedical and research and development employment opportunities north of Saffron Walden and south of Cambridge.
Takeley	An extension to Priors Green, Takeley would lead to development in the Countryside Protection Zone (CPZ) leading to a high level of harm to the purposes of the CPZ. Development would have a detrimental impact on the highway network and M11 Junction 8 in particular. Furthermore the scale of development being promoted was not large enough to provide a self-sustaining community.
Chelmer Mead (Little Dunmow)	Land at Little Dunmow was rejected because of issues in relation to highways and the need for a new junction on to the A120. The site is considered an unsustainable location because it may be more difficult to integrate a high frequency bus service connection to rail services due to the site being some distance from rail links; and it would lead to the coalescence the settlements of Little Dunmow and Flitch Green with detrimental impacts on historic assets of Little Dunmow.
Birchanger	Land at Birchanger lies within the Metropolitan Green Belt. The Uttlesford Green Belt Review 2016 found that the Green Belt in this location performed strongly against the functions of the Green Belt. Furthermore the scale of development being promoted was not large enough to provide a self-sustaining community.
Elsenham	The decision to reject the location at Elsenham for a new settlement was based on the inadequate access with respect to the strategic road network and the views of the Local Plan Inspector's letters 2014 and the refusal of planning permission for 800 dwellings by the Secretary of State in August 2016.

- 6.96 Based on the above, outline reasons for the rejection or progression of Garden Community scenarios identified in **Table 6.12** are provided below.

Table 6.12: Outline reasons for selection/ rejection of Garden Community options in 2017

Option	Site A	Site B	Site C	Total (including 'constant' components (9,854 dwellings))
Option 1	1a - Great Chesterford (2,500)	2a - Easton Park (2,300)	3a - West of Braintree (600)	5,400 (15,254)
Outline reason	Although the quanta within the Plan has progressed to more accurately reflect expected build out rates and requirements within the Plan period, this option most closely reflects the preferred combination of and level of growth during the plan period at Easton Park, North Uttlesford and West of Braintree. This combination has been selected as it ensures the merits of spatial distribution across the District, with good links to centres of economic growth and employment opportunities, existing services and also good connectivity to strategic roads and nearby rail links.			

Option	Site A	Site B	Site C	Total (including 'constant' components (9,854 dwellings))
Option 2	1a - Great Chesterford (2,500)	3a - West of Braintree (600)	4a - Takeley (1,700)	4,800 (14,654)
Outline reason	The inclusion of Takeley within this scenario would lead to development in the Countryside Protection Zone (CPZ) further leading to a high level of harm to the purposes of the CPZ. Development would have a detrimental impact on the highway network and M11 Junction 8 in particular. Furthermore the scale of development being promoted was not large enough to provide a self-sustaining community.			
Option 3	1a - Great Chesterford (2,500)	3a - West of Braintree (600)	5a - Chelmer Mead (2,700)	5,800 (15,654)
Outline reason	The option was rejected as it includes the development of Chelmer Mead, which was rejected because of issues in relation to highways and the need for a new junction on to the A120. The site is considered an unsustainable location because it may be more difficult to integrate a high frequency bus service connection to rail services due to the site being some distance from rail links; and it would lead to the coalescence the settlements of Little Dunmow and Flitch Green with detrimental impacts on historic assets of Little Dunmow.			
Option 4	1a - Great Chesterford (2,500)	3a - West of Braintree (600)	5b - Chelmer Mead (1,500)	4,600 (14,454)
Outline reason	The option was rejected as it includes the development of Chelmer Mead, which was rejected because of issues in relation to highways and the need for a new junction on to the A120. The site is considered an unsustainable location because it may be more difficult to integrate a high frequency bus service connection to rail services due to the site being some distance from rail links; and it would lead to the coalescence the settlements of Little Dunmow and Flitch Green with detrimental impacts on historic assets of Little Dunmow.			
Option 6	2a - Easton Park (2,300)	3a - West of Braintree (600)	4a - Takeley (1,700)	4,600 (14,454)
Outline reason	The inclusion of Takeley within this scenario would lead to development in the Countryside Protection Zone (CPZ) further leading to a high level of harm to the purposes of the CPZ. Development would have a detrimental impact on the highway network and M11 Junction 8 in particular. Furthermore, the scale of development being promoted was not large enough to provide a self-sustaining community.			
Option 7	2a - Easton Park (2,300)	3a - West of Braintree (600)	5a - Chelmer Mead (2,700)	5,600 (15,454)
Outline reason	The option was rejected as it includes the development of Chelmer Mead, which was rejected because of issues in relation to highways and the need for a new junction on to the A120. The site is considered an unsustainable location because it may be more difficult to integrate a high frequency bus service connection to rail services due to the site being some distance from rail links; and it would lead to the coalescence the settlements of Little Dunmow and Flitch Green with detrimental impacts on historic assets of Little Dunmow.			
Option 8	2a - Easton Park (2,300)	3a - West of Braintree (600)	5b - Chelmer Mead (1,500)	4,400 (14,254)
Outline reason	The option was rejected as it includes the development of Chelmer Mead, which was rejected because of issues in relation to highways and the need for a new junction on to the A120. The site is considered an unsustainable location because it may be more difficult to integrate a high frequency bus service connection to rail services due to the site being some distance from rail links; and it would lead to the coalescence the settlements of Little Dunmow and Flitch Green with detrimental impacts on historic assets of Little Dunmow.			
Option 9	2b - Easton Park (1,150)	3a - West of Braintree (600)	5a - Chelmer Mead (2,700)	4,450 (14,304)
Outline reason	The option was rejected as it includes the development of Chelmer Mead, which was rejected because of issues in relation to highways and the need for a new junction on to the A120. The site is considered an unsustainable location because it may be more difficult to integrate a high frequency bus service connection to rail services due to the site being some distance from rail links; and it would lead to the coalescence the settlements of Little Dunmow and Flitch Green with detrimental impacts on historic assets of Little Dunmow.			

Option	Site A	Site B	Site C	Total (including 'constant' components (9,854 dwellings))
Option 10	3a - West of Braintree (600)	4a - Takeley (1,700)	5a - Chelmer Mead (2,700)	5,000 (14,854)
Outline reason	The inclusion of Takeley within this scenario would lead to development in the Countryside Protection Zone (CPZ) further leading to a high level of harm to the purposes of the CPZ. Development would have a detrimental impact on the highway network and M11 Junction 8 in particular. Furthermore the scale of development being promoted was not large enough to provide a self-sustaining community.			
Option 11	3a - West of Braintree (600)	4b - Takeley (850)	5a - Chelmer Mead (2,700)	4,150 (14,004)
Outline reason	The inclusion of Takeley within this scenario would lead to development in the Countryside Protection Zone (CPZ) further leading to a high level of harm to the purposes of the CPZ. Development would have a detrimental impact on the highway network and M11 Junction 8 in particular. Furthermore the scale of development being promoted was not large enough to provide a self-sustaining community. Additionally, the option of Chelmer Mead was rejected in relation to highways and the need for a new junction on to the A120.			
Option 12	1a - Great Chesterford (2,500)	2b - Easton Park (1,150)	3a - West of Braintree (600)	4,250 (14,104)
Outline reason	The option only just meets the District's OAN with no contingency or buffer identified in relation to going some way to meeting the Plan period housing supply figure identified within the Government's proposed changes to the NPPF, which introduces a standardised methodology. The option was rejected in favour of such a buffer, with higher plan period growth at Easton Park which is considered developable.			
Option 13	1a - Great Chesterford (2,500)	3a - West of Braintree (600)	4b - Takeley (850)	3,950 (13,804)
Outline reason	The inclusion of Takeley within this scenario would lead to development in the Countryside Protection Zone (CPZ) further leading to a high level of harm to the purposes of the CPZ. Development would have a detrimental impact on the highway network and M11 Junction 8 in particular. Furthermore the scale of development being promoted was not large enough to provide a self-sustaining community.			

Development limits

6.97 At this stage a number of alternative policy options were explored in relation to the development limits of settlements, this included their potential removal. However, it was considered that the removal of development limits would not reflect a sound planning approach in line with settlement hierarchy and the wider spatial strategy. The absence of development limits would lead to a significant number of speculative proposals in the Countryside.

Employment options

6.98 At this stage in plan-making a number of alternatives policy approaches were explored through the SA process. Two alternative approaches were identified in terms of the scale of new jobs to be delivered during the plan period based on the findings of the Objectively Assessed Economic Need study at the FEMA level as well as the Employment Land Review. These are set out below:

- SP4(a): A higher indicative increase in jobs (>14,600)
- SP4(b): A lower indicative increase in jobs (<14,600)

6.99 The two options along with the preferred policy approach for a minimum net increase of 14,630 jobs were appraised against the SA framework. The findings of this work are presented in

Chapter 5 of the SA Report that accompanied the Regulation 18 (Draft) Local Plan on consultation from July to September 2017.⁴⁴

- 6.100 The SA concluded that there were no differences between the options against the majority of SA objectives. The preferred policy approach and option SP4(a) were identified as having the potential for a positive effect of greater significance against the SA objective relating to employment.
- 6.101 The option proposing a higher increase in jobs (> 14,600) was rejected as it was not considered achievable within the plan period. The option proposing a lower increase in jobs (< 14,600) was rejected as it would not factor in a suitable amount of growth to meet identified needs.

Other topics

- 6.102 A number of alternative policy approaches were explored and considered through the SA process at this stage. The findings of this work and the outline reasons for the selection or rejection of alternatives for the different policy approaches are presented in Chapter 5 of the SA Report that accompanied the Regulation 18 (Draft) Local Plan on consultation from June to September 2017.

⁴⁴ <https://www.uttlesford.gov.uk/article/4946/Sustainability-appraisal>

7. Regulation 19 Local Plan and Focused Changes 2018

Introduction

7.1 Following consultation on the Regulation 18 (Draft) Local Plan and SA Report in 2017, the representations were reviewed and further technical work was carried out. As for the previous chapter, emerging evidence at this stage is firstly discussed and split into two sections, 'top-down' consideration of high-level issues and the 'bottom-up' consideration of district-level issues. The chapter then goes on to explain how this evidence informed the refinement of spatial strategy alternatives in 2018.

'Top-down' considerations

Housing Market Area (HMA)

7.2 A further SHMA update was carried out and published in July 2017, which took into consideration the latest relevant evidence including the Department for Communities and Local Government's (now Ministry for Housing, Communities and Local Government) 2014 based household projections (July 2016). These updates led to a revised objectively assessed housing need (OAHN) for the HMA of 51,710 dwellings from a previous figure of 46,100 while the need for affordable housing remained largely unchanged from the 2015 SHMA.

7.3 The update identified a slightly increased OAHN for three of the four local authorities in the HMA. However, as the increase had been largely anticipated and accounted for in the HMA level work and preferred strategy, the updated overall housing need across the entire HMA remained broadly consistent with what had already been agreed (signed Memorandum of Understanding, March 2017). As stated in paragraph 47 of the National Planning Policy Framework (NPPF), local authorities should "...ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area..."

7.4 It was not considered necessary to revisit alternatives for the level and distribution of growth for the HMA set out in the signed MoU (March 2017). The SA of Strategic Spatial Options published in 2016 considered three alternatives for the overall level of growth in the HMA, which included the delivery of ~ 46,000, ~ 49,638 and ~ 57,400 new homes within the HMA.⁴⁵ As such, higher numbers including figures approximating to and in excess of 51,710 new dwellings had already been tested and so there was no need to revisit the HMA-level optioneering work.

7.5 As a result, the HMA authorities were satisfied that the approach set out within the MoU will ensure that the predicted housing need of the HMA will be met over the course of the Local Plan periods.⁴⁶

7.6 The updated SHMA (2017) identified the objectively assessed housing need (OAHN) in Uttlesford District to be around 13,332 new homes by 2033 (based on a market signals uplift of 13.63%). The Inspector at the examination for the East Hertfordshire Local Plan adjusted the market signals uplift for East Hertfordshire from 13.63% to 14%. It was therefore considered prudent to do the same for Uttlesford, which led to an OAHN of 13,376 new homes.

7.7 However, this does not take into account the need for growth in communal residential establishments, such as care homes. For Uttlesford there is a further requirement for growth of communal establishments to meet the needs of 504 people. As a result, this was included as part of the wider OAN for the district, taking the figure to 13,880 new homes.

⁴⁵ Epping, East Herts, Harlow and Uttlesford District Councils (2016) SA of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area. <http://www.uttlesford.gov.uk/CHttpHandler.ashx?id=6626&p=0>

⁴⁶ It should be noted that Uttlesford District Council published a Regulation 18 Local Plan for consultation in July 2017, which includes a housing target of 14,100 dwellings.

- 7.8 There is always uncertainty in the forecasting of growth needs; therefore, to reflect uncertainties in the forecasting, and in order to ensure a robust level of growth that meets the needs of the district, the housing requirement for the Local Plan was identified as ‘at least 14,000 homes’ at this stage.

Functional Economic Market Area (FEMA)

- 7.9 Further work was carried out to update the Objectively Assessed Economic Need for the FEMA. This was necessary as some new evidence, including the updated SHMA and updated East of England Forecasting Model, had been released.
- 7.10 The work was published in October 2017 and found that the total requirement is estimated at 86,800 sq m of offices and 261,500 sq m of industrial for the FEMA up to 2033. In land terms this is estimated at 9-22 hectares for offices and 65 hectares for industrial development. **Table 7.1** summarises the requirement 2016-33 for each of the four districts within the FEMA including the additional provision.⁴⁷

Table 7.1 Total estimated future sites and premises requirements 2016-33

	Office (Ha)	Industrial (Ha)
East Herts	3-7	13
Epping Forest	2-5	14
Harlow	2-4	16
Uttlesford	2-5	22
Additional provision to balance labour market	1-2	2
West Essex and East Herts FEMA	10-24	68

- 7.11 A MoU for the distribution of the objectively assessed employment needs for the West Essex/ East Hertfordshire FEMA was signed in May 2018. The agreed preferred scenario arising from the FEMA work includes 16,000 new jobs (2011-33) in Uttlesford District as well as 2-5 ha of offices and 22 ha of industrial (2016-33).

‘Bottom-up’ considerations

- 7.12 A number of additional technical studies were carried out following consultation on the Regulation 18 (Draft) Local Plan and some of these were in response to some of the representations received. A summary of this evidence is provided below.

Gypsy and Traveller Needs

- 7.13 A joint Gypsy and Traveller Accommodation Assessment (GTAA) was carried out and published in January 2018. It concluded that no additional pitches were required for households that meet the planning definition.

Transport Study Addendum

- 7.14 Additional sensitivity testing was carried out to examine the transport impacts of considering additional committed development in the reference case and the effects of applying modal shift assumptions to committed development and Local Plan development. The Transport Study Addendum Report 2 was published in May 2018.⁴⁸
- 7.15 The further work identified that all highway links within Uttlesford currently operate within capacity at the 2016 base year and only a few links in neighbouring districts (within the study area) were identified as being over capacity (greater than 100% stress). The following roads within Uttlesford are forecast to exceed their theoretical link capacity by 2033 without any Local

⁴⁷ Hardisty Jones Associates (October 2017) West Essex and East Hertfordshire Assessment of Employment Needs <https://www.uttlesford.gov.uk/article/4936/Employment>

⁴⁸ WYG prepared for Uttlesford District Council (2018) Uttlesford Local Plan Transport Study Addendum Report 2. <https://www.uttlesford.gov.uk/article/4947/Transport>

Plan development, if all the assumed reference case growth is realised and in the absence of any modal shift away from current levels of car use:

- M11 Junction 7 to Junction 9;
- A120 from the B1383 west of M11J8 to M11J8;
- A120(T) from M11J8 to Great Dunmow;
- B1256 west of Great Dunmow;
- B1008 south of Great Dunmow through Barnston;
- A1060 through Hatfield Heath and Leden Roding;
- B1383 at Stansted Mountfitchet; and
- B1383 at Newport.

7.16 The testing concluded that the addition of Local Plan development traffic increases the total link lengths that are forecast to be at, or close to capacity by the end of 2033. However, it can be seen from the stress plans that, by comparison, the impacts due to Local Plan development traffic are relatively small and committed development traffic will place significantly more pressure on the operation of the highway network within the district than Local Plan growth.

7.17 The results indicate that modal shift will help by reducing overall development car trips. However, the maximum stress levels forecast for the A120(T) within the district still exceed 100% even with the most optimistic (25%) modal shift assumption.

7.18 The Addendum states that, *“Having regard to link capacity impacts, accessibility and sustainable transport the appraisals have found that the following locations would therefore be preferable for new garden communities: Great Chesterford; Easton Park and West of Braintree”*.

A505 Corridor Improvement Feasibility Study

7.19 The study focuses upon the use of the A505 corridor (between the A10 at Royston in Hertfordshire and the A11 at Abington in Cambridgeshire), areas of delay and congestion, constraints, and options through which some of the existing and anticipated future issues associated with the road’s traffic capacity can be resolved.⁴⁹

7.20 The study made the following conclusions:

- The broad corridor in which it runs is relatively free of constraints. Where constraints exist, they relate to either the narrow width of the carriageway and highway boundary, and the need to bridge the motorway, river or rail provision.
- Development in the sub-region, across Uttlesford and the neighbouring authorities in Cambridgeshire, Hertfordshire and Suffolk, will generate a large increase in vehicles seeking to use the A505. However, Uttlesford itself will only generate a relatively small proportion of this, amounting to between 2% and 11% of all trips.
- Despite the anticipated increase in demand on the corridor there are various options through which the link capacity of the A505 could be improved. These include both ‘online’ and ‘off-line’ interventions, which have the potential to both increase capacity and generate additional benefits in the form of opening up additional land for development, and air quality, safety and severance improvements.

A120(T)/A120 Corridor Mitigation Strategy

7.21 A note was published in June 2018 that summarised the proposed strategy for mitigating the impact of Local Plan development traffic on the A120(T)/A120 corridor within Uttlesford - between the boundary with East Hertfordshire at the A120/B1383 junction approximately 2km west of M11 Junction 8 and the boundary with Braintree at Blake End. In summary the mitigation strategy proposes the following.

⁴⁹ WYG prepared for Uttlesford District Council (2018) A505 Corridor Improvement Feasibility Study: A10 to the A11. <https://www.uttlesford.gov.uk/article/4947/Transport>

First five years:

- Promote development at locations that are or can be made sustainable.
- Apply Garden Community principles for major allocations.
- Deliver infrastructure and services to facilitate uptake of sustainable travel.
- Interim improvements at M11 Junction.
- Interim improvements at the A120/A1250 Roundabout.
- Interim improvements at the A120/B1383 Stansted Road Roundabout.
- Identify site specific transport mitigation at the planning application stage.

Beyond five years:

- Monitor A120(T)/A120 corridor performance.
- Review mitigation strategy every five years in line with Local Plan reviews.
- Measures to manage peak period traffic flows.
- The A120(T) to A12(T) upgrade scheme to improve the A120(T) Galley's Corner and Mark's Farm Roundabout junctions as part of RIS2.
- Identify and promote a 'long term' solution at M11 Junction 8 for delivery through future RIS.

Historic environment

7.22 A number of assessments were carried out in relation to the historic environment. These included the following:

- Brief Archaeological Assessment - Proposed Uttlesford Garden Communities (Place Services, Essex County Council, January 2018);
- Archaeological Assessment of Allocated Sites (Place Services, Essex County Council, February 2018);
- Heritage Impact Assessments for the Garden Communities (Donald Insall Associates, May 2018); and
- Archaeology Addendum notes for North Uttlesford, Easton Park, West of Braintree Garden Communities (June 2018).

Water Cycle Study Update

7.23 This update was published in April 2018 and assessed the provision of key wastewater infrastructure and any associated new environmental permit requirements for accommodating the proposed Garden Communities.⁵⁰ It sought to address the issues previously raised by the Environment Agency during the Regulation 18 (Draft) Local Plan Consultation in 2017.

7.24 The study found that substantial new water supply infrastructure will be required for the new Garden Community sites (i.e. in addition to water efficiency measures beyond the current statutory standards). It indicates there are limited constraints associated with the allocated development in the Towns and Key Villages, with the existing Water Recycling Centres (WRCs) having the capacity to accommodate increased flows, with future investment and planning by the operating water and sewerage company. Overall, following consultation with Anglian Water and Thames Water, no significant sewerage capacity issues associated with any of the Garden Community sites as amount to potential "show stoppers"; however, some existing WRCs would likely require major upgrades and new tighter discharge consents where necessary in order to accommodate the increased flow.

7.25 The study also found that the major impact of the potential development sites on the water environment will be the variations in water quality and quantity discharged to receiving

⁵⁰ Arcadis on behalf of Uttlesford District Council (2018) Uttlesford District Water Cycle Study: Detailed Update - First Stage. <https://www.uttlesford.gov.uk/article/4942/Infrastructure>

watercourses from the sites themselves (surface water runoff) and the WRC that serve the sites. Water discharged from the sites will require careful management to ensure the development does not have a detrimental impact on the water environment.

Infrastructure Delivery Plan

7.26 The IDP was updated in 2018 to take account of representations received and reflect changes made to the Local Plan.⁵¹ This identified many of the same challenges in terms of physical and social infrastructure as the IDP published in 2017.

Economic Viability Study

7.27 The Viability Study demonstrated that the Local Plan policies in relation to residential development are financially viable for all typologies tested and that a policy requiring 40% affordable housing on sites of 11 units or more is achievable (H6). The high-level appraisal of Garden Community typologies, based on available information, concluded that the allocated Garden Community sites are deliverable in the plan period and beyond.⁵²

Strategic Land Availability Assessment (SLAA) Update

7.28 The methodology used to assess sites submitted through the Call for Sites process was updated in May 2018. From this point the process was called the Strategic Land Availability Assessment (SLAA) rather than the Strategic Housing Land Availability Assessment (SHLAA). Since the Call for Sites exercise and publication of the SHMA in 2015, additional sites have been submitted for consideration either through the Call for Sites process or through representations to the Regulation 18 (Draft) Local Plan in 2017 which were assessed and included in the SLAA. In addition the Green Belt Review and the Countryside Protection Zone Study had been published.

7.29 Furthermore the Council had identified its preferred spatial strategy which focuses the majority of development to the towns and new Garden Communities and for the Key Villages to be a major focus for development in the rural areas with more limited development in the Type A Villages.

7.30 A total of 372 sites (including the additional sites) were submitted through the Call for Sites process at this stage. Only sites which proposed 5 or more dwellings, 500m² or more employment space or 1 or more gypsy or traveller pitch were considered through the SLAA process; any smaller sites were considered potential windfall.

7.31 The new methodology applied a site classification. Once an assessment of the site against the suitability, availability and achievability tests had been undertaken, each site was given a Classification from A to E as indicated in **Table 7.2** below.

⁵¹ Troy Planning on behalf of Uttlesford District Council (2018) Infrastructure Development Plan.

<https://www.uttlesford.gov.uk/article/4942/Infrastructure>

⁵² Three Dragons and Troy Planning on behalf of Uttlesford District Council (2018) Economic Viability Study.

<https://www.uttlesford.gov.uk/article/4942/Infrastructure>

Table 7.2: SLAA Classifications

Classification	Explanation
A	These are sites which have planning permission and are generally considered deliverable within the first five years of the plan period.
B	These are sites that are considered deliverable/ developable within the plan period but do not currently have planning permission. These sites are largely free from major physical and infrastructure constraints. The sites are broadly in line with National Planning Policy considerations and the development strategy of the emerging Local Plan.
C	These are sites where further work is needed to demonstrate the achievability or suitability of sites. This can include issues such as achieving a suitable access, mitigating impacts of noise or air pollution from the M11/A120/railway line; mitigate against small parts of the site being subject to flooding; or to minimise the impact on neighbouring uses or the landscape, historic or natural assets.
D	Sites in this category are likely to be broadly developable but not deliverable within the plan period. Developability may only become realistic if other sites are built out so these sites represent future extensions, but this would require speculative consideration far beyond the 15 year plan period.
E	These sites are not considered developable and delivery is not considered suitable within 15 years for one or more of the following reasons: <ul style="list-style-type: none"> • Departure from National Policy leading to development in unsustainable locations Development being of a vastly disproportionate scale to the adjacent settlement. • Sites contrary to the development strategy of concentrating development in Garden. Communities which are of a scale to be self-contained and provide a secondary school. • Sites in Type B villages where development would not contribute to sustainable patterns of development. • Sites which contribute to the purposes of the Green Belt or Countryside protection Zone as identified in the Green Belt Review (2016) and the Countryside Protection Zone Review (2016). • Sites with insurmountable physical constraints such as flood risk, noise pollution.

7.32 Those sites which fall within Classification A-B are likely to come forward during the plan period and therefore contribute towards the overall housing supply in Uttlesford District. The findings of the SLAA are summarised in **Appendix IV** of this SA Report.

SA of site options

7.33 Any new site options that passed the criteria previously used and referred to in Chapter 6 of this SA Report, were subject to appraisal through the SA process. The SA criteria were set out in Annex C and the findings presented in Appendix 2 of the SA Report published alongside the Regulation 19 Pre-submission Local Plan in June 2018.⁵³

⁵³ <https://www.uttlesford.gov.uk/article/4946/Sustainability-appraisal>

Refinement of spatial strategy alternatives in 2018

Regulation 19 Local Plan (July 2018)

7.34 The Council reviewed and took into consideration all the representations received from the Regulation 18 (Draft) Local Plan consultation in 2017 as well as further technical work carried out.

Distribution scenarios

7.35 There was no new evidence at this stage to suggest that alternatives needed to be explored further in terms of the distribution of housing growth during the plan period. The updated SLAA did not identify any new strategic site options that could deliver significant growth during the plan period. Furthermore, there was no new evidence to suggest that there could be significantly higher growth at the towns and villages within the district given the previously identified constraints.

7.36 Despite this, at this stage it was considered appropriate to undertake some further high level appraisal work to examine the trade-offs between more traditional solutions to accommodating growth (i.e. expansion of existing settlements/ urban areas) versus the delivery of new settlements or Garden Communities.

7.37 It should be noted that the assessment was based on a number of assumptions and these are set out in Appendix 5 of the SA Report that accompanied the Regulation 19 Local Plan on consultation in June 2018.⁵⁴ This included an assumption that the options could meet the OAHN.

7.38 The appraisal found that the traditional approaches performed more poorly against SA Objectives relating to biodiversity, historic environment, sustainable travel, housing, education and the economy. It found that new settlements are more likely to result in significant long term positive effects as the critical mass they provide will enable the delivery of more new infrastructure and that it will also be better integrated with development. The findings of the appraisal were presented in Appendix 5 of the SA Report that accompanied the Regulation 19 Local Plan on consultation from June to August 2018.⁵⁵

7.39 The hybrid distribution strategy agreed at Full Council on 26th July 2016 and subsequently tested through the development of the Regulation 18 (Draft) Local Plan remained the preferred strategy, due largely to the infrastructure benefits that new communities can deliver in part from the land value capture opportunities that a new community offers. Existing towns and villages often have existing infrastructure constraints where it is more difficult to provide for the new infrastructure needed for major growth. Existing towns also have other issues such as impact on sensitive landscape and impact on the road infrastructure for example.

7.40 As a result, the outline reasons for selecting/ rejecting the five development scenarios set out in **Table 6.6**, in Chapter 6 of this SA Report were considered to still be valid at this stage in plan-making.

Scale of housing growth

7.41 Since the Regulation 18 (Draft) Local Plan consultation stage in 2017 the Ministry of Housing, Communities and Local Government's (MHCLG) (formerly the Department for Communities and Local Government) introduced a standardised methodology for calculating OAHN nationally. This initially indicated that OAHN for the District is 16,280 dwellings over the plan period (2011-2033) or 740 dwellings per annum. However, it should be noted that the methodology has not yet been formally adopted, and a transitional period is built into the revised NPPF, allowing plan preparation that has reached an advanced stage to progress.

7.42 Despite this, it was considered prudent to explore an additional option for a higher level of housing growth during the plan period alongside the four options (SP3a to SP3d) identified earlier in Chapter 6 of this SA Report. The following additional option was identified:

⁵⁴ <https://www.uttlesford.gov.uk/article/4946/Sustainability-appraisal>

⁵⁵ Ibid.

- SP3(e): A total of 16,280 dwellings over the plan period - as identified as the OAN for the District in the MHCLG consultation using the standardised methodology. In order to meet this quantum, it can be expected that the District could require the allocation of five new Garden Communities or further allocations on the edge of existing communities.
- 7.43 This option was subject to appraisal through the SA process. The findings of this work were presented alongside that for the other four options in Chapter 5 of the SA Report that accompanied the Regulation 19 Local Plan on Consultation from June to August 2018.⁵⁶
- 7.44 The SA found that options SP3(a) and SP3(e) performed similarly with a higher level of growth more likely to result in positive effects of greater significance for SA Objectives relating to housing, communities and accessibility. However, they are also more likely to have significant negative effects against SA Objectives relating to biodiversity, the landscape and pollution.
- 7.45 Outline reasons for the rejection or progression of the options for the scale of housing growth at this stage are provided in **Table 7.3** below.

Table 7.3: Outline reasons for selection/ rejection of scale and distribution options in 2016/17

Scenario	Outline reasons
SP3(a): A higher indicative figure than that within the SHMA (>14,100 dwellings from 2011-2033, specified as 15,500) - In order to deliver this quantum, the District would require the allocation of four new Garden Communities.	Four new Garden Communities was discounted as an option as it would lead to increased environmental effects in the Plan area. Additionally, no currently rejected Garden Community option has been deemed a sustainable option for allocation due to insurmountable issues/ an inability for benefits to outweigh constraints.
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.	This alternative was rejected as it would not meet the District's Objectively Assessed Need (OAN) for housing within the Plan period.
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.	This alternative was rejected as it would not meet the District's Objectively Assessed Need (OAN) for housing within the Plan period.
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.	This alternative was rejected as it would not meet the District's Objectively Assessed Need (OAN) for housing within the Plan period.
SP3(e): A total of 16,280 dwellings over the plan period - as identified as the OAN for the District in the MHCLG consultation using a standardised methodology. In order to meet this quantum, it can be expected that the District could require the allocation of five new Garden Communities or further allocations on the edge of existing communities.	Four new Garden Communities was discounted as an option as it would lead to increased environmental effects in the Plan area. Additionally, no currently rejected Garden Community option has been deemed a sustainable option for allocation due to insurmountable issues/ an inability for benefits to outweigh constraints. Furthermore, there is no current requirement to meet the OAHN identified in the standardised methodology.

Garden Communities

- 7.46 At the time of preparing the Regulation 19 Local Plan and the SA Report, the North Essex Authorities' (Braintree DC, Colchester BC and Tendring DC) common strategic 'Section One' Local Plan had additional hearing sessions scheduled as part of that Plan's Examination in Public (EiP). The NEAs were awaiting confirmation from the Inspector whether the Plan is sound, or whether amendments were needed to render it sound. This could feasibly mean that the West of Braintree Garden Community might not come forward as identified in the Section One Plan.

⁵⁶ <https://www.uttlesford.gov.uk/article/4946/Sustainability-appraisal>

7.47 As a result of this it was considered prudent at this stage to explore additional GC scenarios that reflected the possibility that the West of Braintree Garden Community might not come forward. These new GC scenarios were based on the four remaining GC options considered at the previous stage in plan-making (Great Chesterford, Easton Park, Takeley and Chelmer Mead).

7.48 A further four GC scenarios were identified and these are set out in **Table 7.4** below. The twelve GC scenarios explored at the previous stage of plan-making are set out in **Table 6.12** in Chapter 6 of this SA Report.

Table 7.4: Additional Garden Community scenarios 2018

Option	Site A	Site B	Site C	Total (including 'constant' components (9,854 dwellings))
Option 14	1a - Great Chesterford (2,500)	2b - Easton Park (1,150)	4b - Takeley (850)	4,500 (14,354)
Option 15	1a - Great Chesterford (2,500)	2b - Easton Park (1,150)	5a - Chelmer Mead (1,500)	5,150 (15,004)
Option 16	1a - Great Chesterford (2,500)	4b - Takeley (850)	5a - Chelmer Mead (1,500)	4,850 (14,704)
Option 17	2a - Easton Park (2,300)	4b - Takeley (850)	5b - Chelmer Mead (1,500)	4,650 (14,504)

7.49 The four additional GC scenarios were subject appraisal through the SA process and the findings presented alongside the other twelve GC scenarios in Appendix 1 of the SA Report that accompanied the Regulation 19 Local Plan on consultation from June to August 2018.⁵⁷

7.50 The outline reasons for the rejection/ selection of the additional GC scenarios are provided in **Table 7.5** below and should be read in conjunction with the outline reasons presented in **Table 6.12** in Chapter 6 of this SA Report.

Table 7.5: Outline reasons for selection/ rejection of Garden Community options in 2017

Option	Site A	Site B	Site C	Total (including 'constant' components (9,854 dwellings))
Option 14	1a - Great Chesterford (2,500)	2b - Easton Park (1,150)	4b - Takeley (850)	4,500 (14,354)
Outline reasons	The inclusion of Takeley within this scenario would lead to development in the Countryside Protection Zone (CPZ) resulting in a high level of harm to the purposes of the CPZ. Development would have a detrimental impact on the highway network and M11 Junction 8 in particular. Furthermore, the scale of development being promoted was not large enough to provide a self-sustaining community.			
Option 15	1a - Great Chesterford (2,500)	2b - Easton Park (1,150)	5a - Chelmer Mead (1,500)	5,150 (15,004)
Outline reasons	The option was rejected as it includes the development of Chelmer Mead, which was rejected because of issues in relation to highways and the need for a new junction on to the A120. The site is considered an unsustainable location because it may be more difficult to integrate a high frequency bus service connection to rail services due to the site being some distance from rail links; and it would lead to the coalescence the settlements of Little Dunmow and Flitch Green with detrimental impacts on historic assets of Little Dunmow.			
Option 16	1a - Great Chesterford (2,500)	4b - Takeley (850)	5a - Chelmer Mead (1,500)	4,850 (14,704)
Outline reasons	The inclusion of Takeley within this scenario would lead to development in the Countryside Protection Zone (CPZ) resulting in a high level of harm to the purposes of the CPZ. Development would have a detrimental impact on the highway network and M11 Junction 8 in			

⁵⁷ <https://www.uttlesford.gov.uk/article/4946/Sustainability-appraisal>

Option	Site A	Site B	Site C	Total (including 'constant' components (9,854 dwellings))
	particular. Furthermore, the scale of development being promoted was not large enough to provide a self-sustaining community.			
Option 17	2a - Easton Park (2,300)	4b - Takeley (850)	5b - Chelmer Mead (1,500)	4,650 (14,504)
Outline reasons	The inclusion of Takeley within this scenario would lead to development in the Countryside Protection Zone (CPZ) resulting in a high level of harm to the purposes of the CPZ. Development would have a detrimental impact on the highway network and M11 Junction 8 in particular. Furthermore, the scale of development being promoted was not large enough to provide a self-sustaining community.			

7.51 The further appraisal work confirmed that the preferred approach was still GC scenario/ option 1 as it most closely reflects the preferred distribution scenario and preferred combination of GC options (Easton Park, North Uttlesford and West of Braintree).

7.52 The three preferred GC options are well located on the strategic road network and close to major employment locations including southern Cambridgeshire and Stansted Airport. North Uttlesford GC is close to rail stations on the existing rail line to London and Cambridge, and the proposed to be improved A1307 public transport corridor. There is also potential for an east - west rapid transit scheme linking Easton Park and West of Braintree garden communities to Stansted Airport and beyond into Hertfordshire.

Employment options

7.53 There were no further employment options explored at this stage in plan-making.

Other topics

7.54 There were no further options explored at this stage in plan-making.

Addendum of Focused Changes (October 2018)

Overview

7.55 The Uttlesford Local Plan - Addendum of Focused Changes (October 2018) identified ten proposed amendments to the Regulation 19 Local Plan that was subject to consultation from 25th June to 13th August 2018. The Focused Changes principally covered three main areas:

- A commitment to undertake a Plan Review should the West of Braintree Garden Community allocation be considered undeliverable within the North Essex Authorities (NEAs) Section One Local Plan examination.
- An additional requirement to undertake Appropriate Assessment at the project scale to identify any mitigation measures to address potential effects on European wildlife sites.
- A requirement for an assessment of a development's impact on air quality on 'Habitats Sites' at the planning application stage.

Consideration of Alternatives

7.56 Alternatives were explored for the first change that related to the West of Braintree Garden Community. The alternatives identified were as follows:

1. The previous Plan position - allocation of West of Braintree with no specific commitment to a Plan Review should West of Braintree be determined undevelopable in its entirety.
2. To remove the West of Braintree Garden Community from the Plan and commit to a 'single issue' Plan Review on the Garden Community once its deliverability status is known.
3. Those combinations without West of Braintree previously considered under a three Garden Community scenario, namely:
 - a. Takeley; and

- b. Chelmer Mead.
4. A higher quantum of housing supply at North Uttlesford Garden Community and Easton Park Garden Community.
 5. A return to a focus on those spatial strategy options that explored two GCs, with more focus on existing towns and villages.
- 7.57 Each of the options identified above were subject to an appraisal through the SA process. The SA found that the options are predicted to have a number of similar effects, largely associated with the constant elements of the Plan across all options. These represent the inclusion of the allocated Garden Communities at Easton Park and North Uttlesford, the Plan's smaller site allocations and the Plan's policy content. A summary of the findings of the SA along with outline reasons for the selection/ rejection of the alternatives is provided below.

"The Proposed Approach has been assessed as having similar impact as those identified within the Regulation 19 Local Plan SA due to a distribution of growth that offers homebuyers this geographic choice. It should also be considered that new settlements should additionally be well related to existing areas, in so far as their critical mass can offer wider benefits. The Proposed Approach will have significantly positive impacts on providing housing growth in accordance with the Spatial Strategy and the settlement hierarchy.

The uncertainty regarding the West of Braintree option can be considered negated due to the increased lead in time for the delivery of the West of Braintree Garden Community option in comparison to the other allocated Garden Community options as evidenced within the plan's Housing Trajectory; this enables any required Plan Review or the identification of alternative locations for the 970 dwellings in the Plan period to be completed before the expected start date of 2025, at least notionally. The commitment to a Plan Review embedded into the Plan at this stage to account for any possibility that the West of Braintree Garden Community option is deemed undeliverable allows elements of the Plan to be found sound if such uncertainty still exists at the time of examination in public. This ensures positive impacts on housing delivery for the majority of the Plan period and maximises the sustainability of development as allocations have been identified through a robust Plan-led process.

Those options that do not factor in a Plan Review, or seek to remove the West of Braintree Garden Community with a committed single issue review on the 'shortfall' removing West of Braintree represents, has been identified as having uncertain impacts where there is an increased likelihood that the Plan would be submitted for examination without meeting its OAN. This may not allow, at least comparatively, the possibility that other elements of the Plan could be adopted. There could therefore be an increase in speculative development that is not 'plan-led' in the absence of an up-to-date Local Plan.

Exploring other Garden Community options to 'replace' the West of Braintree Garden Community allows consideration of options on a like-for-like basis, including also the consideration of development at Takeley or Chelmer Mead for a lower dwelling threshold related to the 970 dwelling 'shortfall'. Despite this, smaller scales of development at each of these locations is unlikely to lead to any re-consideration of their selection, as the principle reasons for their rejection remain valid - landscape designations highlighted within the Takeley option and transport reasons for Chelmer Mead.

The option of bringing forward development that would have been beyond the plan period, into the plan period at North Uttlesford and Easton Park has largely been assessed as uncertain related to achievability. Notionally, should development be brought forward earlier than identified (2022-23), this may be to the detriment of any 'infrastructure first' approach and may similarly affect any mitigation proposals required as necessary. The level of infrastructure required for each option, and the land take needed, is significant and additionally the time estimates for site promotion, preparation of proposals, submission and determination of applications (and resolving planning obligations) and the subsequent 'lead-in' time between approval and commencement on site should all not be under-estimated. The Plan states that the 'Local Plan's policies for the new Garden Communities have been adopted following extensive consultation between developers, landowners, infrastructure providers and other key stakeholders. The anticipated timetable for delivering these strategic allocations is therefore well-understood and realistic. The Local Plan period and housing trajectory allows some

contingency for relatively minor delays in the earlier phases.’ As a result, it is uncertain whether these two options could provide any additional dwellings within the plan-period beyond those stated within Policy SP3 and in consideration of the Plan’s Housing Trajectory.

The alternative of focusing any 970 dwelling ‘shortfall’ within existing settlements requires re-considering a number of sites that have currently been rejected. The Spatial Strategy is clear that there is a focus of directing development to existing settlements in the first instance; however it can be considered that as settlements expand, new development locations becoming increasingly peripheral and less well related to centres. At the individual site level, a broad statement can be made regarding the Council’s site selection methodology, consisting of the SLAA and the SA and also influenced by an extensive Plan evidence base. The methodology of selecting and assessing sites factors in numerous environmental and social factors, which strongly contribute to a site’s overall suitability. Any site that failed this test of suitability was not selected as an allocation within the Plan. To that extent, this alternative is likely to lead to a need to allocate sites that have at this present time failed the Council’s suitability testing within the SLAA. There can be expected to be uncertain to negative overall impacts as a result of this alternative”.

- 7.58 The findings of the SA were presented in a SA report that accompanied the Addendum of Focused Changes to the Regulation 19 Local Plan on consultation from 16th October to the 27th November 2018.⁵⁸

⁵⁸ <https://www.uttlesford.gov.uk/article/4946/Sustainability-appraisal>

8. Regulation 22 Submission Local Plan 2018/19

Introduction

- 8.1 At this stage the Council is preparing to submit the Regulation 19 Local Plan and Addendum of Focused Changes to the Secretary of State for examination in public in January 2019.
- 8.2 Representations received through consultation on the Regulation 19 Local Plan and Addendum of Focused Changes raised a number of concerns in relation to the SA process for the Local Plan. This included concerns around the consideration of Garden Community options through the SA process as well as the narrative and justification for the preferred spatial strategy.
- 8.3 A further concern identified by the Council was that the Inspector's Post-Hearing Letter (June 2018) published during the examination for the North Essex Authorities (NEA) Local Plans (Strategic Section 1), identified a number of shortcomings in that plan's SA process. These were:
1. Objectivity of the assessment of the chosen spatial strategy and the alternatives to it;
 2. The clarity of the descriptions of those spatial strategy alternatives and the reasons for selecting them; and
 3. The selection of Garden Communities (GC) and GCs for assessment.
- 8.4 Given the concerns identified above, the Council decided that it would be prudent to undertake further work at this stage to try and address some of the issues raised and ensure a robust SA process for the Local Plan.
- 8.5 Chapters 5, 6 and 7 in this SA Report have sought to provide a clear summary of the work undertaken to date in terms of developing and appraising alternatives through the plan-making/ SA process.
- 8.6 In response to the concerns identified above the aim of this Chapter is to:
- Clearly set out the realistic locations, delivery rates and therefore reasonable alternatives for Garden Communities. Provide a fresh objective and comparative appraisal of these alternatives through the SA process.
 - Clearly explain how the evidence is brought together in order to establish reasonable district-wide spatial strategy alternatives. Provide a clear description of the options as well as an objective and comparative appraisal of them through the SA process.
 - Clearly present the Council's outline reasons for selecting the preferred approach and rejecting alternatives at this stage.

Structure of this Chapter

- 8.7 This Chapter is structured as follows:
- **'Top-down' considerations** - briefly sets out the key high-level issues around the quantum of growth.
 - **'Bottom-up' considerations** - sets out the key information on site options both for Garden Communities and other sites to meet the identified quantum.
 - **Establishing the reasonable alternatives** - brings the evidence together and sets out spatial strategy alternatives as well as some employment land options.
 - **Appraising the reasonable alternatives** - presents the summary findings of the appraisal.

- **Developing the preferred approach** - presents the Council's outline reasons for selecting the preferred approach and rejecting alternatives.

'Top-down' considerations

Housing quantum

- 8.8 As set out in Chapter 7, the identified OAHN for the plan period is 'at least 14,000 homes'. This is based on the updated SHMA (2017) that took account of the 2014-based household projections and the outcomes from the recent examinations of other Local Plans within the HMA (adopted East Hertfordshire Local Plan).
- 8.9 It should be noted that the Government released the 2016-based household projections in September 2018. However, there is uncertainty regarding these projections. This is on the basis that Government is currently consulting on a proposal to revert to using the 2014-based household projections data (in the short-term, i.e. until new 2018-based projections are issued) as they consider them to be unduly low.⁵⁹ As a result, the identified OAHN of at least 14,000 new homes during the plan period is still justified.
- 8.10 A Memorandum of Understanding (MoU) was signed in March 2017 regarding the spatial distribution of housing across the HMA. Uttlesford is committed to meeting its housing need within its administrative boundaries; no other authority has requested that Uttlesford help to meet any unmet needs.
- 8.11 There are limited arguments to suggest that the Local Plan might provide for below OAHN. While the signed MoU (March 2017) proposes that Uttlesford will deliver around 12,500 new homes during the plan period, updated evidence in the SHMA suggests that the level of need is higher. Options that involve delivering below OAHN can be ruled-out as unreasonable on the basis that Uttlesford is committed through the MoU to meeting its housing need within its administrative boundaries. There is also no potential to export unmet needs to neighbouring authorities during the plan period, which are equally as constrained as Uttlesford.
- 8.12 Options that involve delivering above the OAHN have been explored and appraised at past plan-making/ SA stages. It is not considered necessary to explore options for delivering a higher OAHN at this stage on the basis that no other authorities within our outside the HMA have requested help to meet unmet needs. While this may change in the future it is clear from the evidence presented in Chapters 5, 6 and 7 that there are limited opportunities to deliver the current housing requirement during the plan period let alone deliver additional growth to meet unmet needs from other areas.

Employment quantum

- 8.13 There are two documents which provide overarching quantitative assessment of employment land requirements: the 2017 ELR (AECOM) and the 2017 FEMA study (HJA). It should be noted that there are some differences in output between the ELR and FEMA. This is most noticeable in terms of industrial and warehousing (B2/B8) requirements.
- 8.14 The FEMA study informed the MoU for the distribution of the objectively assessed employment needs for the West Essex/ East Hertfordshire FEMA which was signed in May 2018. The agreed preferred scenario arising from the FEMA work includes 16,000 new jobs (2011-33) in Uttlesford District as well as 2-5 ha of offices and 22 ha of industrial space (2016-33).
- 8.15 Options were explored to deliver a higher and lower number of new jobs during the plan period in previous plan-making/ SA stages and rejected. There is no new evidence to suggest that these options should be revisited at this stage.

59

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/751810/LHN_Consultation.pdf

‘Bottom-up’ considerations

- 8.16 The work above gives us an understanding of the housing and employment requirement which would need to be delivered through sites within Uttlesford. There remains a need to develop an understanding of the supply of land within the district to deliver the remaining housing and employment requirement.

Garden Communities

Identification of GC options

- 8.17 As summarised in Chapter 6, the potential to deliver a new settlement has been explored since the early stages of plan-making in 2015. Broad Areas of Search (AoS) were identified based on their potential to contribute to effective cross-boundary strategic planning priorities; minimise the need to travel by car; leisure opportunities and other facilities; and access to strategic highways and rail network. Areas were excluded if they contained significant constraints, such as Registered Parks and Gardens or Sites of Special Scientific Interest (SSSIs).
- 8.18 New settlements need to be of sufficient size to support the required range of social and physical infrastructure. In line with this and in response to the Issues and Options consultation in 2015, Essex County Council advised that any new settlement would require its own secondary school as part of the provision. This would require a minimum of some 5,000 houses/flats to support this provision. Any new settlement(s) would therefore likely be in the range of 5,000 - 10,000 homes which would be developed over a 20 - 25 year period. As a result, the minimum capacity for a site to be considered a reasonable alternative for a new settlement is 5,000 dwellings.
- 8.19 It should be noted that this minimum threshold is also consistent with NEAs Strategic Section 1 Local Plan, which is currently at examination. The Inspector considered the 5,000 dwelling minimum threshold and noted that it is substantially higher than the minimum size of 1,500 dwellings set by the Government for garden village proposals. It is also higher than the thresholds of 3,000 houses or 4,000 dwellings (houses and flats) requiring a new secondary school, according to ECC’s Developers Guide to Infrastructure Contributions (2016). However, the latter thresholds would support only a four-form entry secondary school, the minimum size that ECC regard as financially viable. In Paragraph 117 of the Post-Hearing Letter (June 2018) the Inspector concluded that:⁶⁰
- “In setting the GC threshold it was legitimate, in my view, for the NEAs to take account of the increased financial viability, curriculum choice and range of facilities that a larger secondary school could provide. It was logical also to take into account the greater range of employment opportunities, healthcare and other community facilities that could be supported by a GC of 5,000 dwellings compared with a smaller settlement.”*
- 8.20 The Call for Sites process and the SLAA identified two sites in the district that fall within an AoS for a new settlement and also meet the minimum threshold of 5,000 dwellings to deliver a new secondary school. These are land to the North East of Great Chesterford (SLAA Ref: 10Gte15) within AoS 1, referred to as ‘North Uttlesford’ and land to the west of Great Dunmow and north of the A120 (SLAA Ref: 06LtEas15) in AoS 7, referred to as ‘Easton Park’.
- 8.21 Land was also identified within AoS 9 but the two component sites do not have sufficient capacity to deliver the minimum threshold of 5,000 dwellings for a new GC. However, on-going discussions with Braintree District Council through the duty to co-operate resulted in the identification of a potential for a joint new settlement comprising these two sites (SHLAA Ref: 05Ste15 and 06Ste15) within Uttlesford and land within Braintree District that could meet the minimum 5,000 dwelling threshold.
- 8.22 No other available sites have been identified through the Call for Sites or SLAA process that fall within or outside an AoS that could deliver a minimum of 5,000 new dwellings either during and/or beyond the plan period.

⁶⁰ https://www.braintree.gov.uk/info/200643/section_1/1065/section_1_examination_publication_local_plan/4

8.23 Several other options have been considered previously through plan-making and the SA (as set out in Chapters 6 and 7), but can be ruled-out as unreasonable for consideration as a Garden Community at the current time for the following reasons:

- **Elsenham (07Els15)** - The site does not have capacity to deliver 5,000 new dwellings and therefore provide a new secondary school. There are also significant constraints to delivering large-scale growth in this location.
- **Birchanger (05Bir15)** - The site does not have capacity to deliver 5,000 new dwellings and therefore provide a new secondary school. The site is also located within the GB and the GB Review did not recommend this site for release.
- **Takeley (11Tak15 and 13Tak15)** - The sites to the north of Takeley and south of the A120 do not have capacity to deliver 5,000 new dwellings and therefore provide a new secondary school. There are also significant constraints to delivering large-scale growth in this location.
- **Chelmer Mead (03LtDun14)** - The sites to the north of Little Dunmow and between the A120 and sites between Little Dunmow and Flich Green do not have capacity to deliver 5,000 new dwellings and therefore provide a new secondary school. There are also significant constraints to delivering large-scale growth in this location.

8.24 While these four options are not reasonable for consideration as a GC, they do warrant further consideration as part of the development of wider spatial strategy alternatives, i.e. increased growth at the villages. This is discussed further later in this Chapter.

Exploring the capacity of the identified GC options

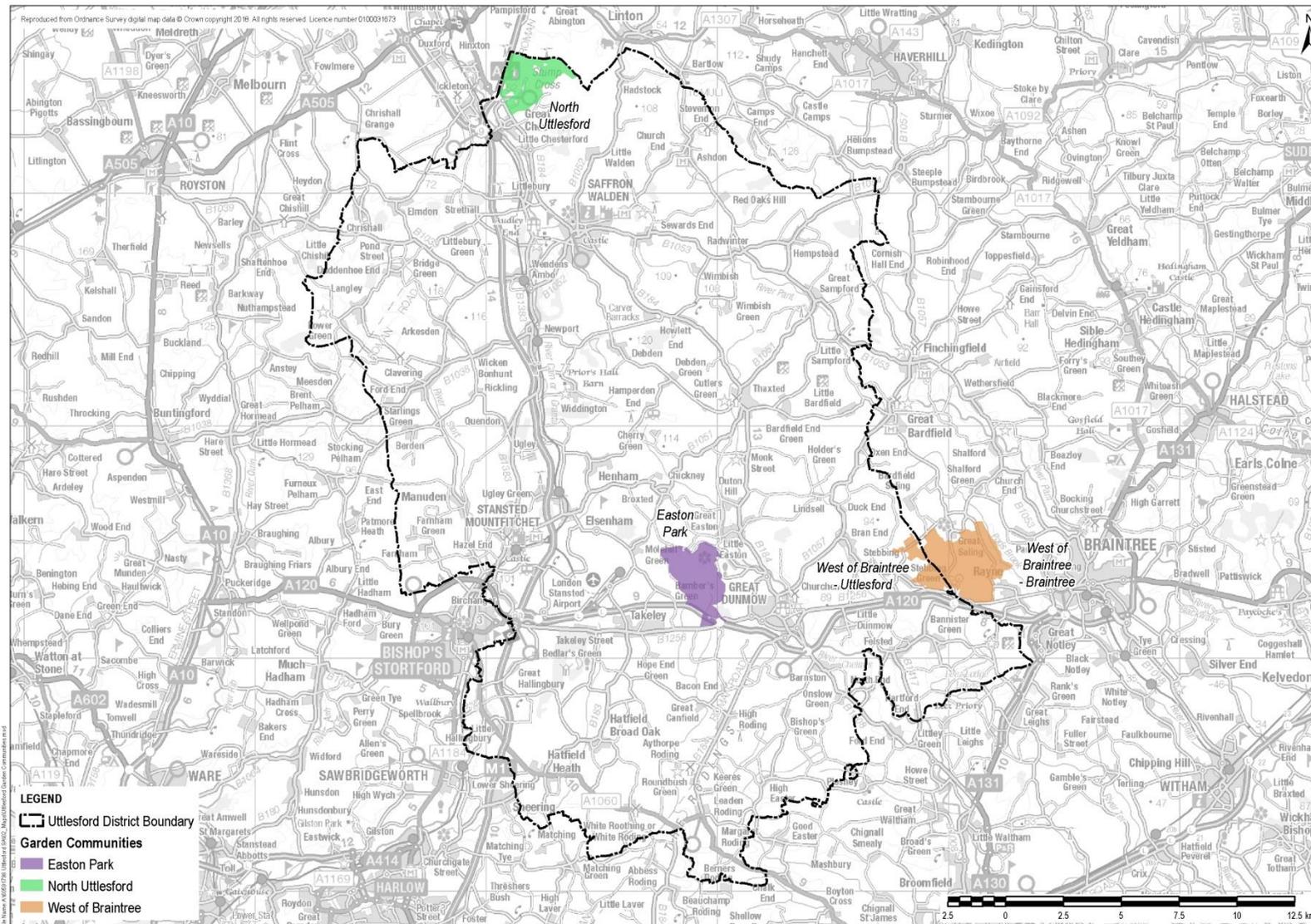
8.25 Taking the above into account, it is considered that there are only three reasonable site options that need to be explored for the delivery of new GCs. **Table 8.1** sets out the capacity of the options to deliver growth within the plan period (2011 to 2033), beyond the plan period (post 2033) and in total. This is based on the evidence as well as discussions with promoters and Braintree District Council.

Table 8.1: Garden Community options

Site	Delivery during plan period (up to 2033)	Delivery post plan period (post 2033)	Total delivery
North Uttlesford	1,925 dwellings	3,075 dwellings	5,000 dwellings
Easton Park	1,925 dwellings	8,075 dwellings	10,000 dwellings
West of Braintree	970 dwellings within Uttlesford District	2,530 dwellings within Uttlesford District	10,500 - 11,000 dwellings within Uttlesford and Braintree Districts

8.26 The three GC options are presented in **Figure 3** on the next page.

Figure 3: Garden Community options



- 8.27 For the North Uttlesford option there are limited opportunities to explore an increased level of growth above the 5,000 dwelling minimum threshold given the sensitivity of the landscape⁶¹ and historic environment⁶². A higher level of growth would not help to deliver additional mitigation or benefits that would reduce the significance of negative effects on the landscape or the historic environment. Exploring a lower level of growth is also not reasonable as it would then deliver less than 5,000 dwelling minimum threshold for a GC.
- 8.28 The Council has been in discussions with South Cambridgeshire District Council and Cambridgeshire County Council about the interaction between North Uttlesford and existing communities and new development in South Cambridgeshire. Cambridgeshire County Council are reasonably content that the transport evidence shows that there is deliverable mitigation for the likely impact of the proposed development on Cambridgeshire roads.⁶³ South Cambridgeshire District Council remains concerned about the deliverability of transport solutions and landscape impacts on Cambridgeshire, whilst recognising the potential benefits North Uttlesford could have in terms of labour supply for the southern employment cluster, and secondary school provision for limited new housing near Hinxton.⁶⁴
- 8.29 The delivery of 10,000 dwellings at the Easton Park option has been determined based on the various evidence base studies carried out (including landscape and heritage impact assessments) and through discussions with the promoters of the site. As for the North Uttlesford option, there are limited opportunities to explore a higher level of growth at this site given the sensitivity of the landscape and historic environment. A higher level of growth would not help to deliver additional mitigation or benefits that would reduce the significance of negative effects on the landscape or the historic environment. It is reasonable however, given the sensitivities of the site to explore an option for a lower level of growth that meets the minimum threshold of 5,000 dwellings for a new GC. It should be noted that it is assumed that a lower scale of growth would deliver less infrastructure improvements, including the proposed Rapid Transit Scheme (RTS).
- 8.30 The consideration of potential options for the capacity of the West of Braintree GC is limited to the areas of the site that fall within Uttlesford District. As noted above there are two separate sites within the district that both form part of the wider GC option along with land in Braintree District. The North Essex Garden Communities Concept Framework for West of Braintree⁶⁵, identifies the 'southern part' of the site in Braintree as the preferred option. This particular distribution of development would result in the northern site in Uttlesford not adjoining the larger site on the Braintree side of the border. Consequently, there is reasonable alternative that looks at only the southern site in Uttlesford (Option 2a below).
- 8.31 Taking the above into account the following GC options have been identified for appraisal through the SA process:

⁶¹ Chris Blandford Associates (2017) Land at North Uttlesford Landscape & Visual Appraisal [online] available at: <https://www.uttlesford.gov.uk/article/4937/Environment> [accessed 20/11/18]

⁶² Historic England's response to the Regulation 19 Local Plan

⁶³ Cambridgeshire County Council Position Statement: <https://www.uttlesford.gov.uk/article/4947/Transport>

⁶⁴ South Cambridgeshire District Council's response to the Regulation 19 Local Plan

⁶⁵ https://www.braintree.gov.uk/downloads/file/6370/garden_communities_-_west_of_braintree_concept_framework_may_2017

Table 8.2: Garden Community options for appraisal

Option	Delivery during the plan period (up to 2033)	Delivery total
Option 1: North Uttlesford	1,925 dwellings	5,000 dwellings
Option 2: West of Braintree	2a: Delivery on the southern site only within Uttlesford	970 dwellings
	2a: Delivery on the southern and northern site within Uttlesford	970 dwellings
Option 3: Easton Park	3a: Reduced level of growth	1,925 dwellings
	3b: Preferred level of growth	1,925 dwellings

8.32 It should be noted that representations raised concerns that the emerging Local Plan places too much reliance on the GCs for the delivery of new homes during the plan period, referring to research on the speed and rate of delivery of large-scale housing developments.⁶⁶ Taking this into account, it would seem prudent to explore alternative district-wide spatial strategies that rely less on the delivery of GCs during the plan period. This is explored further in the later section which seeks to establish reasonable district-wide spatial strategy alternatives.

8.33 Something else to note is that that additional evidence was carried out to try and provide an indicative forecast of the amount of employment land to be included within the proposed Garden Communities.⁶⁷ It estimated that the following level of employment will be required for the GCs:

- Easton Park:
 - 1-2 ha of land for office use during plan period and 6-10 at full completion.
 - 3-5 ha of industrial and warehousing land within the plan period and 18-25 ha at full completion.
- North Uttlesford:
 - 1-2 ha of land for office use during plan period and 3-5 at full completion.
 - 3-5 ha of industrial and warehousing land within the plan period and 9-13 ha at full completion.
- West of Braintree:
 - c. 1 ha of land for office use during plan period increasing to 2-3 ha at full completion within the Uttlesford element.
 - 2-3 ha of industrial and warehousing land within the plan period and 6-9 ha at full completion within the Uttlesford element.

8.34 It is not considered necessary to explore different levels of potential alternatives for employment land provision at the GCs. The evidence document has considered this in considerable detail.

⁶⁶ Nathaniel Litchfields & partners (2016) Start to Finish - How Quickly do Large-Scale Housing Sites Deliver?
<https://lichfields.uk/media/1728/start-to-finish.pdf>

⁶⁷ HJA on behalf of Uttlesford District Council (2018) Ensuring a Robust Employment Evidence for the Uttlesford Local Plan.
<https://www.uttlesford.gov.uk/article/4936/employment>

Appraisal of the GC options

8.35 Each of the options identified in **Table 8.2** was subject to a comparative appraisal against the SA Framework. The detailed findings of this work are presented in **Appendix V**. A summary of the appraisal findings are presented in **Table 8.3** below.

8.36 Detailed appraisal methodology is explained in **Appendix V** but in summary: The appraisal table comprises a row for each of the objectives that make up the SA Framework (see **Table 3.1**). Within each row the alternatives are categorised in terms of potential to result in 'significant effects' (using **red/ green**) and also ranked in order of relative performance (with ' = ' used to denote instances where the alternatives perform on a par, i.e. it not possible to differentiate between them). If an option is ranked as 1 then it is preferred to an option that is ranked 2. Please note that the rank is not linked to the potential for a significant effect.

Table 8.3: Summary appraisal of the Garden Community options

Summary findings and conclusions					
Categorisation and rank					
SA Objective	Option 1: North Uttlesford (5,000 dwellings)	Option 2a: West of Braintree (8,500 - 9,000 dwellings - including 1,500 on southern site)	Option 2b: West of Braintree (10,500 - 11,000 dwellings - including 3,500 on both northern and southern site)	Option 3a: Easton Park (5,000 dwellings)	Option 3b: Easton Park (10,000 dwellings)
1: Biodiversity	2	4	4	1	3
2: Water quality and resources	2	3	3	1	3
3: Landscape	5	1	2	3	4
4: Soil/ sustainable use of land	1	2	4	1	3
5: Historic environment	4	1	2	3	4
6: Climate change	2	1	1	2	1
7: Reduce and control pollution	2	1	1	2	1
8: To reduce the risk of flooding	3	4	5	1	2
9: Sustainable methods of travel	2	1	1	2	1
10: Accessibility to services	3	1	1	2	1
11: Health and social inclusion	3	1	1	2	1
12: Housing	2	4	3	2	1
13: Resources and infrastructure	2	1	1	2	1
14: Education and skills	4	3	1	4	2
15: Employment	4	3	2	4	1

8.37 The appraisal found that for a number of the SA objectives, the GC options are likely to have a **significant negative effect**, and these are summarised below:

- Potential effects on designated **biodiversity**: whilst all of the options present biodiversity constraints that would need to be addressed, the full extent of the Easton Park site includes land adjacent to High Wood, Dunmow SSSI, and the West of Braintree options contain a Local Wildlife Site (LWS). These options are considered to have the potential for significant negative effects as a result of direct habitat loss (at the West of Braintree) and increased disturbance, noise, light and air pollution. However, it should be noted that the

assessment has also identified significant potential under Option 3b at Easton Park to deliver positive effects through biodiversity enhancement/ net gain.

- Material changes to the **landscape**: the delivery of any of the GCs will develop large areas of previously undeveloped land, which will ultimately permanently change the rural landscape character in these areas of the district. Each of the GC options are in locations of high or moderate to high landscape and visual sensitivity, and each site contains certain areas which are particularly sensitive to development. Sensitive design and layout along with wider mitigation will be required to minimise impacts and any opportunities to provide new accessible and valued landscapes should be explored.
- Significant loss of key **soil resources**: the delivery of any of the GC options will result in a significant loss of greenfield and Grade 2 best and most versatile agricultural land with the potential for permanent significant negative effects.
- Development affecting the **historic environment**: the scale of growth proposed at each of the options will significantly change the historic rural character and setting of designated heritage assets within or close to these areas, with the potential for significant permanent negative effects. Each site contains designated and non-designated heritage assets that will need to be protected and where possible, enhanced through the development of the GCs. The North Uttlesford GC is identified as being particularly sensitive in terms of the landscape and historic environment.

8.38 The appraisal also found that for a number of the SA objectives, the GCs present opportunities for long term **significant positive effects**, and these are summarised below:

- Significant delivery of **housing** to meet the identified local needs.
- Improvements to **sustainable transport** options within the district: most notably the combined delivery of a new Rapid Transit System (RTS) with the Easton Park and West of Braintree sites that will support existing and future residents with increased sustainable access between Stansted Airport, the two GCs, Great Dunmow and Braintree, leading to positive effects against a number of SA objectives.
- Large scale development enabling **delivery of new physical and social infrastructure**: including the delivery of a new secondary school (under all options), and a new Country Park (under Option 3b).

8.39 While the appraisal did not identify any further significant effects, it did highlight some potential cumulative effects:

- The cumulative effect of significant growth at GCs has the potential to impact the Epping Forest Special Area of Conservation (SAC) as a result of decreased air quality (associated with the likely increase in traffic and congestion as a result of development). This is assessed in more detail through the accompanying Habitats Regulations Assessment (HRA); however, it is recommended that policy provisions seek contributions from development to support the ongoing mitigation and monitoring of effects on air quality in the vicinity of the Epping Forest SAC.
- Cumulatively, the delivery of mixed use development at the GCs will contribute to meeting employment needs in accessible locations, supporting increased self-containment within the GCs and a reduced need to travel.

Outline reasons for selection/ rejection of Garden Community options

8.40 Outline reasons for the rejection or progression of the GC options in light of the appraisal above and wider evidence are provided in **Table 8.4** below.

Table 8.4: Outline reasons for the selection or rejection of Garden Community options

	Option	Outline reasons
Option 1: North Uttlesford		Development of new Garden Communities allows for the provision of substantial new infrastructure, including a secondary school. There is potential to provide good access to nearby employment sites and improved public transport links. While there are potential heritage and landscape impacts of the development, mitigation is proposed, and alternatives are assessed to have similar impacts.
Option 2: West of Braintree	2a: Delivery on the southern site only within Uttlesford	Development on only the southern part of this site is not preferred at this stage as the appraisal does not indicate significant benefits of this lower scale of development. While part of a larger site, a lower level of development would impact on the ability to provide infrastructure.
	2b: Delivery on the southern and northern site within Uttlesford	Development of new Garden Communities allows for the provision of substantial new infrastructure, including a secondary school. This cross boundary site has potential to provide good access to Braintree, Stansted Airport through the provision of a Rapid Transit System. While there are potential heritage and landscape impacts of the development, mitigation is proposed, and alternatives are assessed to have similar impacts.
Option 3: Easton Park	3a: Reduced level of growth	A reduced level of development is not preferred, as while the appraisal does indicate some benefits in terms of a reduced impact on biodiversity, and a somewhat reduced impact on heritage and landscape, there are also less positive impacts in terms of potential infrastructure provision.
	3b: Preferred level of growth	Development of new Garden Communities allows for the provision of substantial new infrastructure, including a secondary school. There is potential to provide good access to Stansted Airport and Great Dunmow through the provision of a Rapid Transit System. While there are potential heritage and landscape impacts of the development, mitigation is proposed, and alternatives are assessed to have similar impacts.

8.41 Taking the above into account Options 1, 2b and 3b were taken forward for consideration as part of the district-wide spatial strategy options.

Other site options

- 8.42 There is also a need to give consideration to the large number of smaller site options that have been submitted to the Council (otherwise known as 'SLAA sites'). Given the advanced stage in plan-making the aim of this section is to explore if there is the potential for any additional growth at the towns and villages. These additional or 'omission' sites can then be taken forward for further consideration in the development of alternatives for the district-wide spatial strategy.
- 8.43 As discussed in Chapter 6, the Council explored broad locations for growth around the Main Towns and Villages at an early stage of plan-making. The Call for Sites and SLAA process has helped to identify specific locations for growth both within and outside the Areas of Search identified in 2015. A summary of the SLAA findings is presented in **Appendix IV** of this SA Report and maps illustrating these sites along with key constraints are provided in the same appendix.
- 8.44 Various work-streams have focused on the task of examining the merits of individual site options in isolation, including analysis of proximity to constraint (e.g. SSSI) and opportunity (e.g. school) features using GIS software - see **Appendix IV**. Evidence base studies have also been carried out to determine if there is justification for the release of land from the GB⁶⁸ or the CPZ⁶⁹. All of the sites submitted through the Call for Sites process were considered through the SA, please see **Appendix IV**.

Main Towns

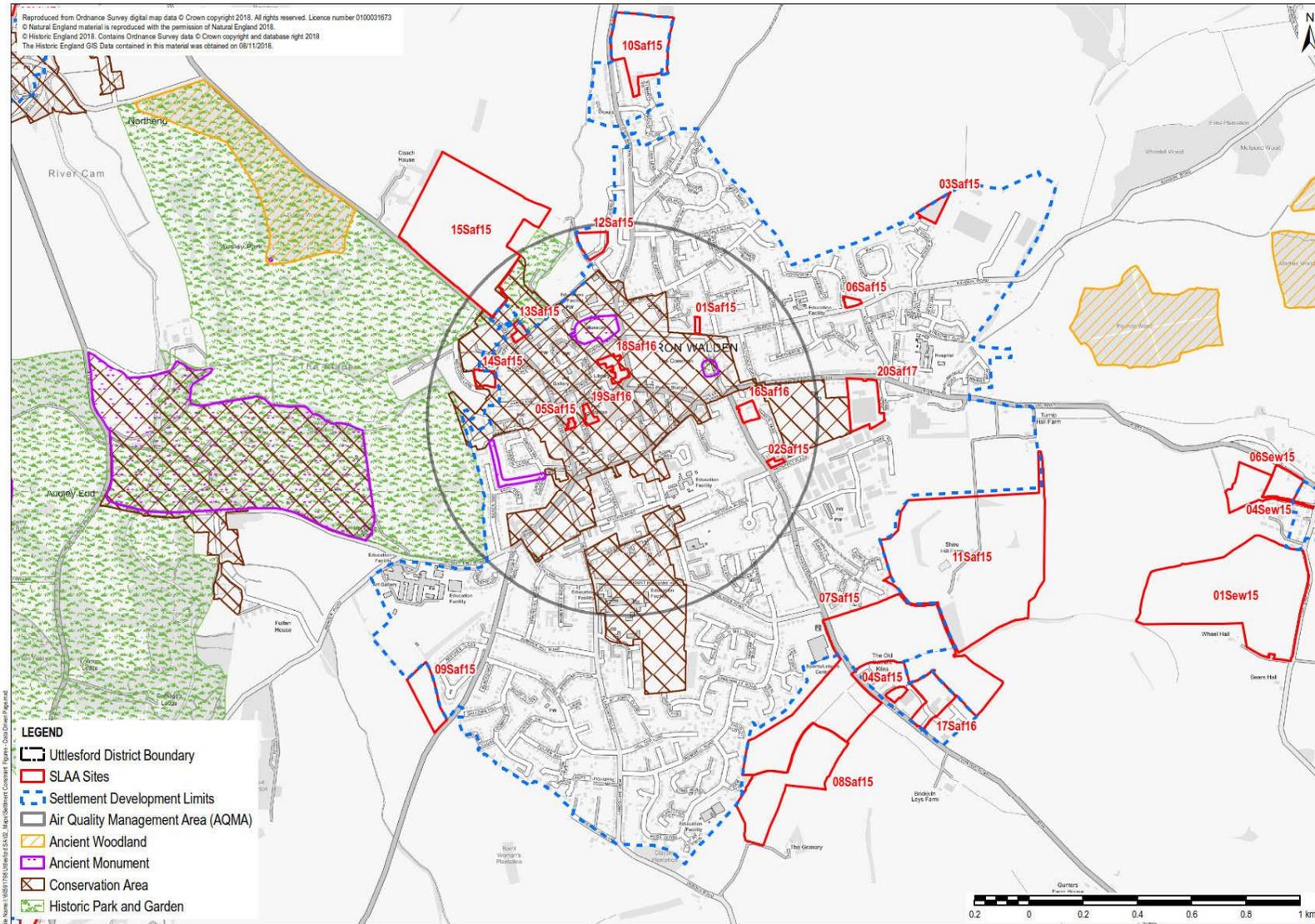
Saffron Walden

- 8.45 Saffron Walden is the largest town in the district serving an extensive rural hinterland with the widest range of shops and facilities. It is identified as a Market Town in the settlement hierarchy.
- 8.46 Between April 2011 and April 2018 a total of 585 dwellings were built in Saffron Walden. As of April 2018 there are outstanding planning permissions for a total of 610 dwellings. That gives a total of 1,195 dwellings that have either been built out or are committed during the plan period.
- 8.47 Based on the findings of the SLAA and wider evidence the Council identified the following sites for allocation at Saffron Walden:
- SAF1 for 150 dwellings (SLAA Ref: 07Saf15);
 - SAF2 for 85 dwellings (SLAA Ref: 10Saf15);
 - SAF3 for 10 dwellings (SLAA Ref: 13Saf15);
 - SAF4 for 12 dwellings (SLAA Ref: 16Saf15);
 - SAF5 for 14 dwellings (SLAA Ref: 03Saf15);
 - SAF6 for 13 dwellings (SLAA Ref: 04Saf15);
 - SAF7 for 31 dwellings (SLAA Ref: 12Saf15);
 - SAF8 for 200 dwellings (committed); and
 - SAF9 for 35 dwellings (committed).
- 8.48 The committed development/ sites identified above should be considered as constants for any district-wide options that explore increased growth at Saffron Walden during the plan period.
- 8.49 While a number of other ('omission') sites were submitted within and around the fringe of the settlement through the Call for Sites, the SLAA concluded that they would be unsuitable for development (see **Appendix IV**). Please see **Figure 4** for the sites submitted through the Call for Sites process and assessed through the SLAA at Saffron Walden.

⁶⁸ <https://www.uttlesford.gov.uk/article/4937/Environment>

⁶⁹ Ibid.

Figure 4: Saffron Walden SLAA sites and key constraints



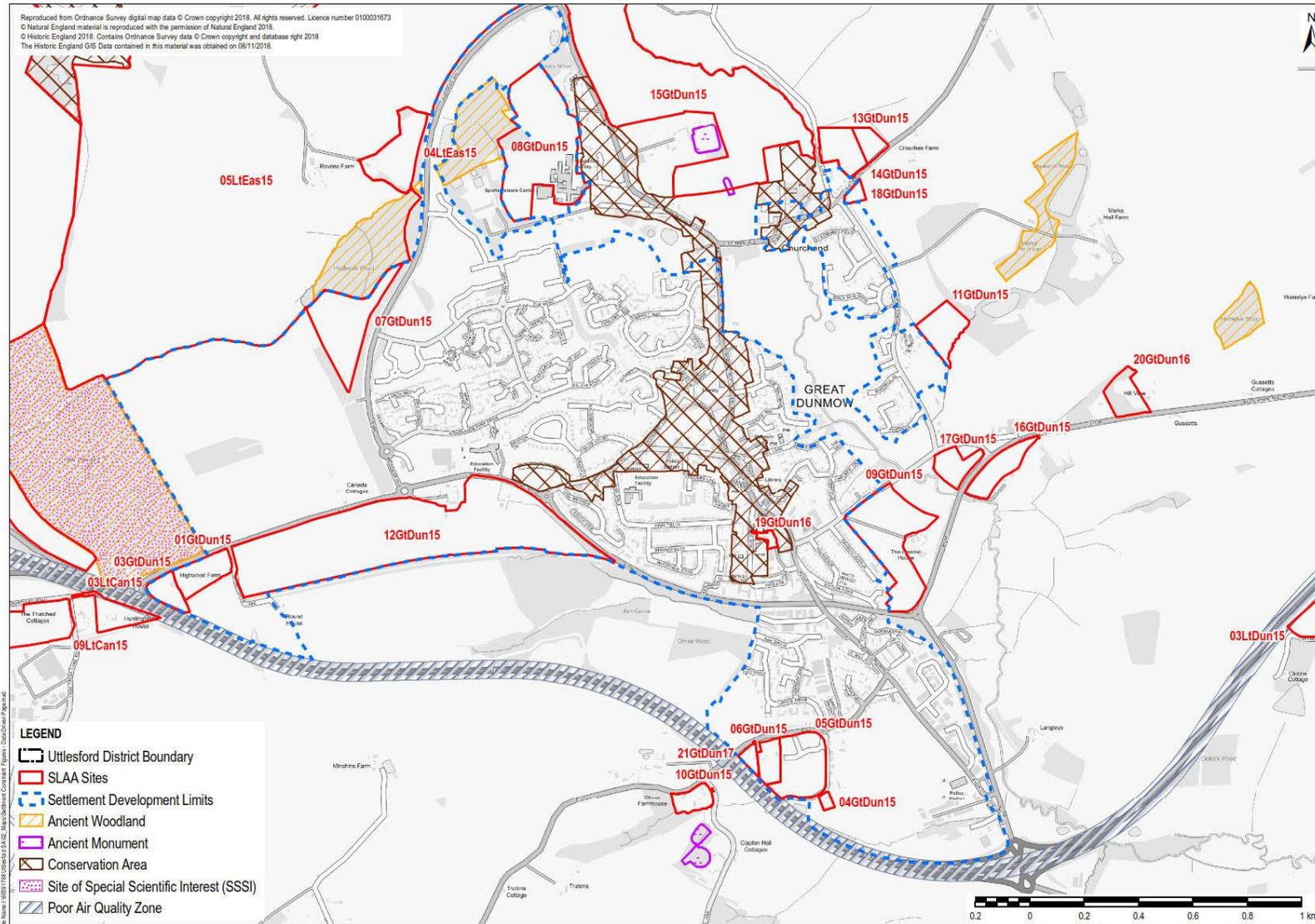
- 8.50 Given the sites submitted through the Call for Sites there are only two areas that could potentially deliver any kind of significant additional growth at Saffron Walden. These are to the South East and the North West of the settlement.
- 8.51 Site 15Saf15 is situated to the North West of the settlement and the SLAA estimates a capacity of approximately 400 dwellings. The site was rejected through the SLAA process as development would have a detrimental impact on the historic core of the town and the majority of the site is not connected to the existing settlement. The site is essentially separated from the built area by the Audley End Historic Park and Garden. As a result, it is considered that this site is not a reasonable option for delivering additional growth at Saffron Walden during the plan period.
- 8.52 Essex County Council tested the impacts of four growth scenarios for between 150 and 1,350 dwellings on the eastern side of Saffron Walden with corresponding supporting measures/ levels of infrastructure. The work found that only the first scenario of 150 dwellings had acceptable traffic impacts. Beyond this level of growth in the town the work found unacceptable traffic impacts even with proportionate supporting infrastructure. In particular beyond the 150 option, the eastern link would have to deal with more traffic than envisaged with unacceptable consequences for the wider network. It also indicated an outer eastern link would be required of sufficient standard with corresponding impacts on the environment. The work briefly considered the impacts of much larger growth (5,000 homes with eastern and southern links). The initial view was that such a link would not solve the town's traffic problems.⁷⁰
- 8.53 Despite the traffic impacts and air quality issues identified above, it was considered necessary to explore site options to the South East further as this is the only remaining area that could accommodate any additional growth given historic environment and landscape constraints elsewhere in the town.
- 8.54 There are a number of available sites to the south east of the settlement (08Saf15, 11Saf15, 17Saf15 and wider areas of 07Saf15 which is an allocation). Additional growth in this area would be most appropriately be directed to 11Saf15 as it sits between a site within existing planning permission and a proposed allocation (SAF1) in the emerging Local Plan. There is also an outline planning application (UTT/13/3467/OP) for 100 dwellings, which will further test the issues at this settlement around traffic and air quality.
- 8.55 A further option that should be explored is site 20Saf17, which is a brownfield site within the settlement development limit. The site makes a contribution to the supply of employment land and is safeguarded as such in the adopted Local Plan. However, if the site was no longer safeguarded for employment there is the potential it could deliver approximately 100 dwellings.
- 8.56 Potential for additional growth at site 07Saf15 to the west of Thaxted Road, for which part of the site has planning permission, is not considered realistic as there would be greater landscape and townscape impacts than to the east of Thaxted Road, and development in the south east of Saffron Walden would need to comply with the County Council's strategy for utilising Peaslands Road to minimise impacts on the Thaxted/Radwinder Road junction. Given this, it is also considered that additional growth at 08Saf15 would also not be reasonable.
- 8.57 It is recognised that there are significant issues around the capacity of the highways network and air quality issues; however, for the purposes of exploring options for additional growth at Saffron Walden site 11Saf15 and 20Saf17 have been carried forward for further consideration with a capacity of around 100 dwellings each. Development at these locations would need to comply with ECCs strategy for utilising Peaslands Road to minimise impacts on the Thaxted/Radwinter Road junction.
- 8.58 Something else to note is Carver Barracks at Wimbish, which is a Ministry of Defence base with around 1,500 military staff and their dependents living on site. The MOD is proposing to vacate the site towards the end of the plan period. This is a substantial site, located to the south of Saffron Walden and could therefore be a potential option for further growth in the next plan period.

⁷⁰ Reference

Great Dunmow

- 8.59 Great Dunmow is the second largest town and an important focus for residents who live in the southern part of the District. It is identified as a Market Town in the settlement hierarchy.
- 8.60 Between April 2011 and April 2018, a total of 561 dwellings were built in Great Dunmow. As of April 2018 there are outstanding planning permissions for a total of 1,846 dwellings. That gives a total of 2,407 dwellings that have either been built out or are committed during the plan period.
- 8.61 Based on the findings of the SLAA and wider evidence the Council identified the following sites for allocation at Great Dunmow:
- GtDUN1 for 400 dwellings (12GTDun15);
 - GtDUN2 for 150 dwellings (08GTDun15);
 - GtDUN3 for 120 dwellings (07GTDun15);
 - GtDUN4 for 60 dwellings (01GTDun15);
 - GtDUN5 for 25 dwellings (06GTDun15);
 - GtDUN6 for 12 dwellings (committed);
 - GtDUN7 for 22 dwellings (11GTDUN15);
 - GtDUN8 for 370 dwellings (committed); and
 - GtDUN9 for 790 dwellings (committed).
- 8.62 The committed development/ sites identified above should be considered as constants for any district-wide options that explore increased growth at Great Dunmow during the plan period.
- 8.63 Given the level of committed development, constraints and existing evidence it is clear that delivering any significant additional growth during the plan period at Great Dunmow will be extremely difficult and in most cases not deliverable. Allocating additional growth would not necessarily result in the delivery of more dwellings during the plan period as given the scale of committed development the market can only absorb so much housing. Nevertheless, it is important to ensure that all potential options for additional growth at Great Dunmow are explored. Please see **Figure 5** for the sites submitted through the Call for Sites process and assessed through the SLAA at Great Dunmow.

Figure 5: Great Dunmow SLAA sites and key constraints

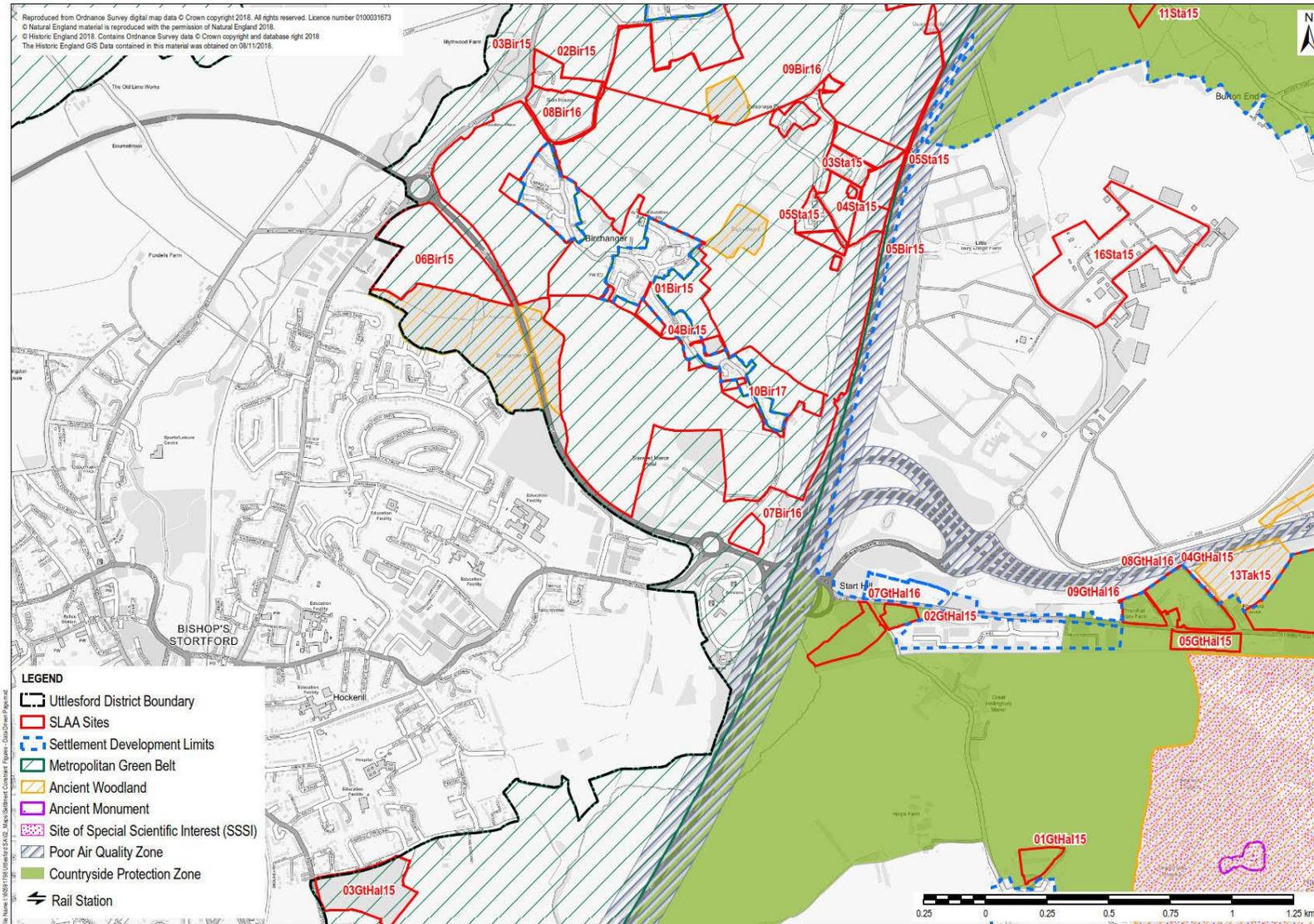


- 8.64 There are only two areas around the settlement that could potentially deliver a significant level of additional growth during the plan period. Site 15GtDun15 to the North was not allocated due largely to the landscape on the historic town. The site does not adjoin existing development limits but is adjacent to the conservation area at Parsonage Downs and Church End. The north eastern edge of the site lies within Flood Zones 2 and 3. A number of the adjoining buildings are listed and there is an ancient monument adjacent to and partially within the site at Parsonage Farm. Development at this site would introduce an area of extensive built development on the slopes of the Chelmer Valley to the detriment of the character of the landscape and the setting of the conservation area. As a result, it is not considered suitable for further consideration when seeking to establish district-wide spatial strategy alternatives.
- 8.65 Site 05LtEas15 is large site to the North West of the settlement which was also refused on appeal (planning application: UTT/13/1043/OP, appeal dismissed 25 August 2016), due largely to impacts on the landscape and the historic environment. Development at this site could lead to coalescence with Little Easton as well as the proposed Easton Park GC. It should be noted that a large part of the site is set to be a Country Park delivered as part of the Easton Park GC. Site 05LtEas15 is therefore not an option for additional growth at Great Dunmow unless the Easton Park GC is not being taken forward. If this were to happen then there is the potential to deliver approximately 1,000 dwellings, which is a scale of development that could provide a new primary school. As a result of the additional infrastructure that development at this site could provide it should be taken forward for further consideration as part of the district-wide spatial strategy alternatives. However, it is recognised that there are significant constraints to growth at this site.
- 8.66 There are a number of smaller site options and, of these, there are two that could potentially deliver a small level of additional growth during the plan period. Site 09GtDun15 in Dunmow Park, which is not designated but does form part of the historic setting of the settlement could potentially deliver 80 dwellings. Site 11GtDun15 is situated on the eastern edge of the settlement and adjoins onto a site with an existing planning permission to the South West. It could deliver approximately 35 dwellings. While it is recognised that these sites have significant issues, they have been carried forward for further consideration as part of establishing district-wide spatial strategy alternatives in order to test the implications of additional growth at Great Dunmow.

Edge of Bishop's Stortford

- 8.67 Bishop's Stortford is a large town within East Hertfordshire District. While it does not fall within the district there are adjacent areas to the existing settlement that fall within Uttlesford District.
- 8.68 A GB Review was carried out in 2016 and found that all the areas within the Areas of Search (identified in 2015) on the edge of Bishop's Stortford perform strongly against the GB purposes. The Council consider that none of the areas should be considered for release.
- 8.69 Given the findings of the GB Review and SLAA the emerging Local Plan does not propose the release of any GB adjacent to Bishop's Stortford for development. There were only two sites (06Bir15 and 03GtHal15) submitted through the Call for Sites process within Uttlesford District and adjacent to Bishop's Stortford. The SLAA estimated that these sites could deliver approximately 530 dwellings during the life of the plan.
- 8.70 Other sites submitted through the Call for Sites are separated from the existing settlement by the A120 and are therefore considered unsuitable. They also fall within the GB and the evidence does not recommend that any areas of the GB be considered for release. Please see **Figure 6** for the sites submitted through the Call for Sites process and assessed through the SLAA on the edge of Bishop's Stortford.
- 8.71 For the purpose of exploring alternative district-wide spatial strategies, sites 06Bir15 and 03GtHal15 have been carried forward for further consideration. They are situated adjacent to the existing settlement and development at these sites would help to reduce reliance on the GCs during the plan period or potentially reduce pressure for growth at some of the lower tier settlements within Uttlesford.

Figure 6: Edge of Bishop's Stortford SLAA sites and key constraints

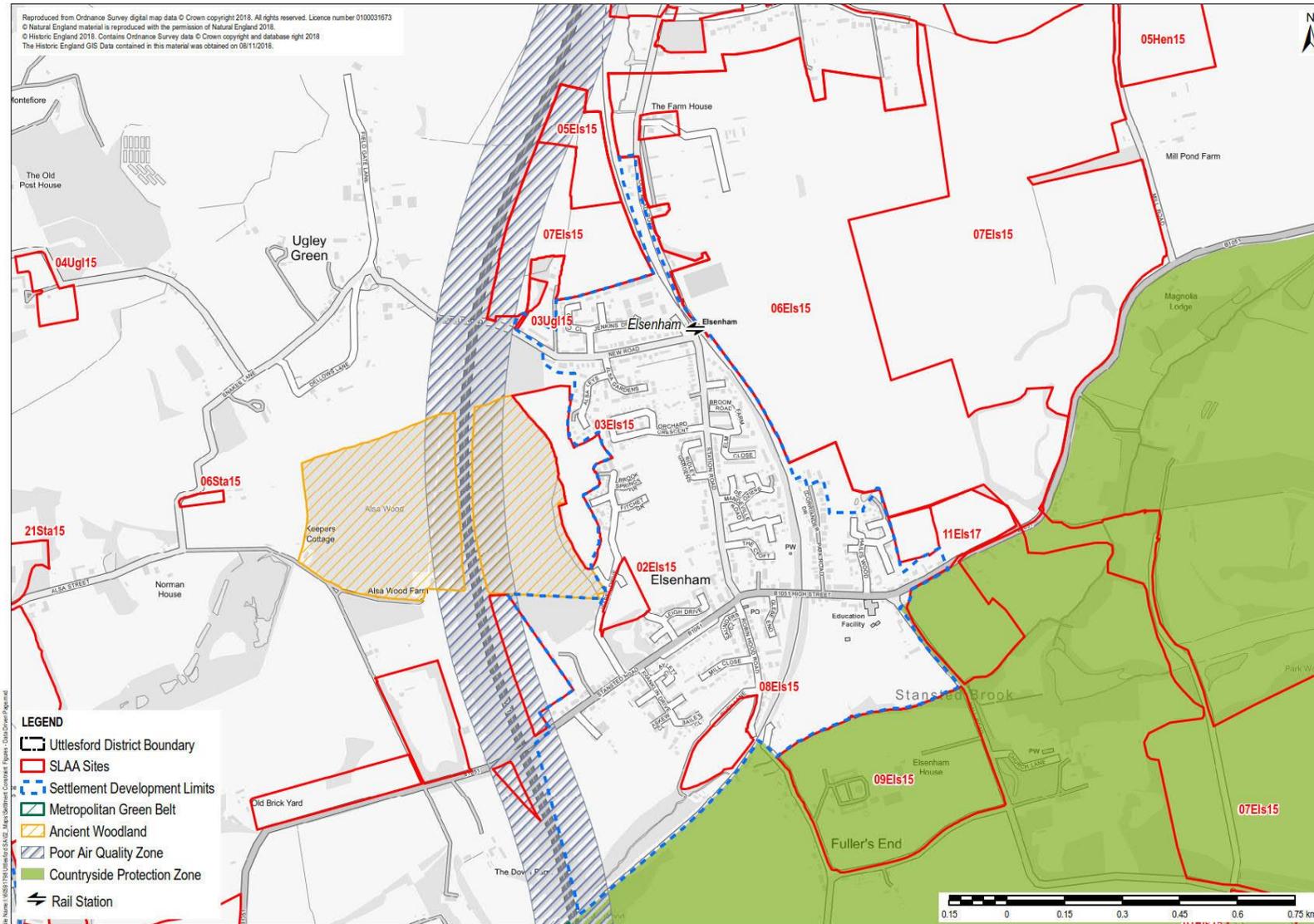


Key Villages

Elsenham

- 8.72 Elsenham is identified as a Key Village in the settlement hierarchy; it also has a train station on the London Liverpool Street/ Cambridge line.
- 8.73 Between April 2011 and April 2018, a total of 385 dwellings were built in Elsenham. As of April 2018 there are outstanding planning permissions for a total of 97 dwellings. That gives a total of 482 dwellings that have either been built out or are committed during the plan period.
- 8.74 Based on the findings of the SLAA and wider evidence the Council identified the following sites for allocation at Elsenham:
- ELS1 for 40 dwellings (08EIs15);
 - ELS2 for 130 dwellings (committed); and
 - ELS3 for 20 dwellings (02EIs15).
- 8.75 The committed development/ sites identified above should be considered as constants for any district-wide options that explore increased growth at Elsenham during the plan period.
- 8.76 A significant number of sites were submitted through the Call for Sites process around the fringes of the village. Please see **Figure 7** for the sites submitted through the Call for Sites process and assessed through the SLAA at Elsenham.

Figure 7: Elsenham SLAA sites and key constraints

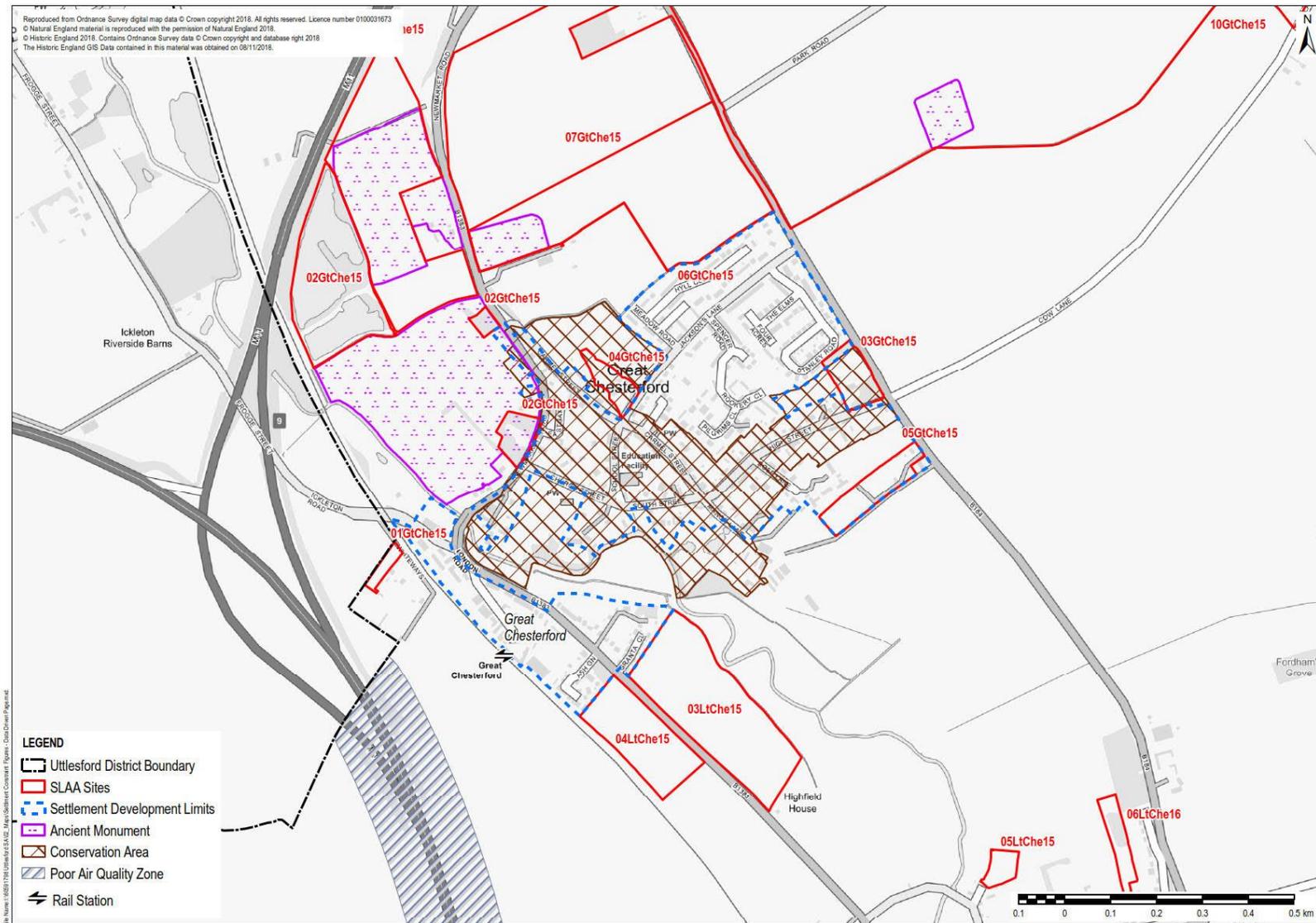


- 8.77 As explained in previous chapters, land to the north and north east (05Els15, 06Els15 and 07Els15) of the village has been promoted for large-scale growth for some time. The withdrawn Local Plan included an allocation in this area and the Inspector raised concerns in relation to the proposal for a linked new settlement at Elsenham for 2,100 dwellings, which he considered to be a 'major village expansion' rather than a new settlement. He also referred to a lack of evidence to demonstrate the suitability of the local roads and the capacity of junction 8 on the M11.
- 8.78 A proposal for 800 dwellings in this area was rejected at appeal in 2016 (UTT/13/0808/OP) because of harm to the landscape/ views, loss of best and most versatile agricultural land and traffic impacts. There is an existing planning application (UTT/17/3573/OP) for a reduced scale of growth at 350 dwellings. It is understood that the applicant is currently in the process of producing further highways evidence which is being discussed with the County Council.
- 8.79 While there are clearly significant constraints to the delivery of large-scale growth on site 06Els15, it is considered appropriate that the existing planning application for a lower scale of growth at 350 dwellings is included for consideration as part of any options for additional growth at Elsenham. There is a further small site to the south of 06Els15 and adjacent to the development limits. Site 11Els17 is a greenfield site with the potential to deliver an estimated 40 dwellings. Alongside the development of 350 dwellings at 06Els15 it has been taken forward for further consideration.
- 8.80 Parts of site 07Els15 and the entirety of site 05Els15 are located to the north of the settlement between the railway line and the M11. A portion of these sites fall within the poor air quality zone for the M11 and there are also issues in terms of access because of the railway line, so these sites have not been taken forward for further consideration.
- 8.81 Site 09Els15 is situated to the south of the settlement and adjacent to an existing planning permission; however, development would not be a natural extension of the village and would extend into an area of more rural character. It has therefore not been taken forward for further consideration.
- 8.82 Site 03Els15 is situated in the east of the village and adjacent to an existing planning application and Ancient Woodland. While the site was rejected because it acts as a buffer between the existing planning application and the ancient woodland, it is considered appropriate that it be considered further as part of an option to deliver additional growth at Elsenham. It is estimated that it could deliver around 100 dwellings.

Great Chesterford

- 8.83 Great Chesterford is identified as a Key Village in the settlement hierarchy; it also has a train station on the London Liverpool Street/ Cambridge line.
- 8.84 Between April 2011 and April 2018, a total of 55 dwellings were built in Great Chesterford. As of April 2018 there are outstanding planning permissions for a total of 77 dwellings. That gives a total of 132 dwellings that have either been built out or are committed during the plan period.
- 8.85 Based on the findings of the SLAA and wider evidence the Council identified the following sites for allocation at Great Chesterford:
- GtCHE1 for 11 dwellings (committed).
- 8.86 The committed development/ sites identified above should be considered as a constant for any district-wide options that explore increased growth at Great Chesterford during the plan period.
- 8.87 Please see **Figure 8** for the sites submitted through the Call for Sites process and assessed through the SLAA at Great Chesterford.

Figure 8: Great Chesterford SLAA sites and key constraints

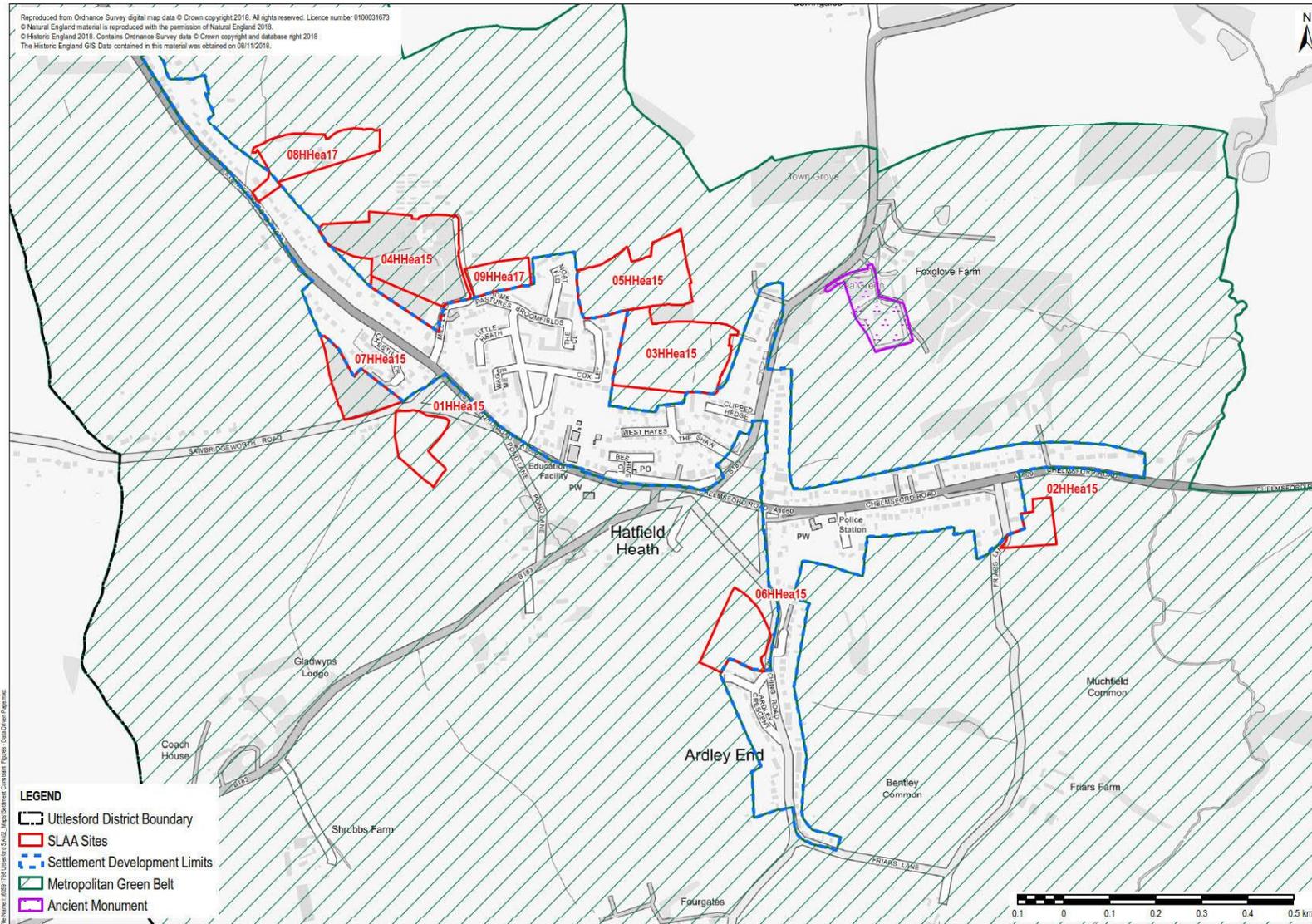


- 8.88 A significant number of sites were submitted through the Call for Sites process around the fringes of the village. Some of these sites fell within the Great Chesterford Conservation Area (03GtChe15 & 04GtChe15) and contained a scheduled monument (02GtChe15 and 06GtChe15). These sites were considered through the SLAA as not suitable for development. Site 06GtChe15 was also rejected as it would reduce the separation between the village and North Uttlesford GC. Even if the North Uttlesford GC was not brought forward, it is still considered that these sites to the north of the settlement would not be suitable for additional growth given the presence of designated heritage assets and the sensitivity of the historic environment.
- 8.89 There are two sites (03LtChe15 and 04LtChe15) close to the train station that were considered unsuitable in the SLAA as development would extend the village south-westwards along the valley, which would diminish the sense of place and local distinctiveness of the settlement. The SLAA states that the southern edge of the village currently forms a strong defensible boundary. However, for the purposes of exploring options for additional growth at Great Chesterford sites 03LtChe15 (estimated capacity of 200 dwellings) and 04LtChe15 (estimated capacity of 100 dwellings) have been taken forward as they could deliver approximately 300 additional dwellings during the plan period and would avoid coalescence with the North Uttlesford GC. They also fall outside the conservation area and do not contain a scheduled monument.

Hatfield Heath

- 8.90 Hatfield Heath is identified as a Key Village in the settlement hierarchy. It is situated in the south of the district and is surrounded by the Green Belt.
- 8.91 The emerging Local Plan does not propose any further growth at this village. While a number of sites were submitted through the Call for Sites either adjacent or in close proximity to the development limit of the settlement, they all fell within the GB. The GB Review (2016) found that the parcels of land for which these sites fall within perform strongly against the GB purposes and did not recommend that any areas be considered for release.
- 8.92 It should be noted that there is a current application (UTT/17/2499/FUL) on the previously developed land within site 04HHEA15 for around 26 dwellings. While this will only deliver a small level of growth it has been carried forward for further consideration as part of the district-wide spatial strategy alternatives as there is no additional growth currently proposed through the Local Plan at this settlement.
- 8.93 Please see **Figure 9** for the sites submitted through the Call for Sites process and assessed through the SLAA at Hatfield Heath.

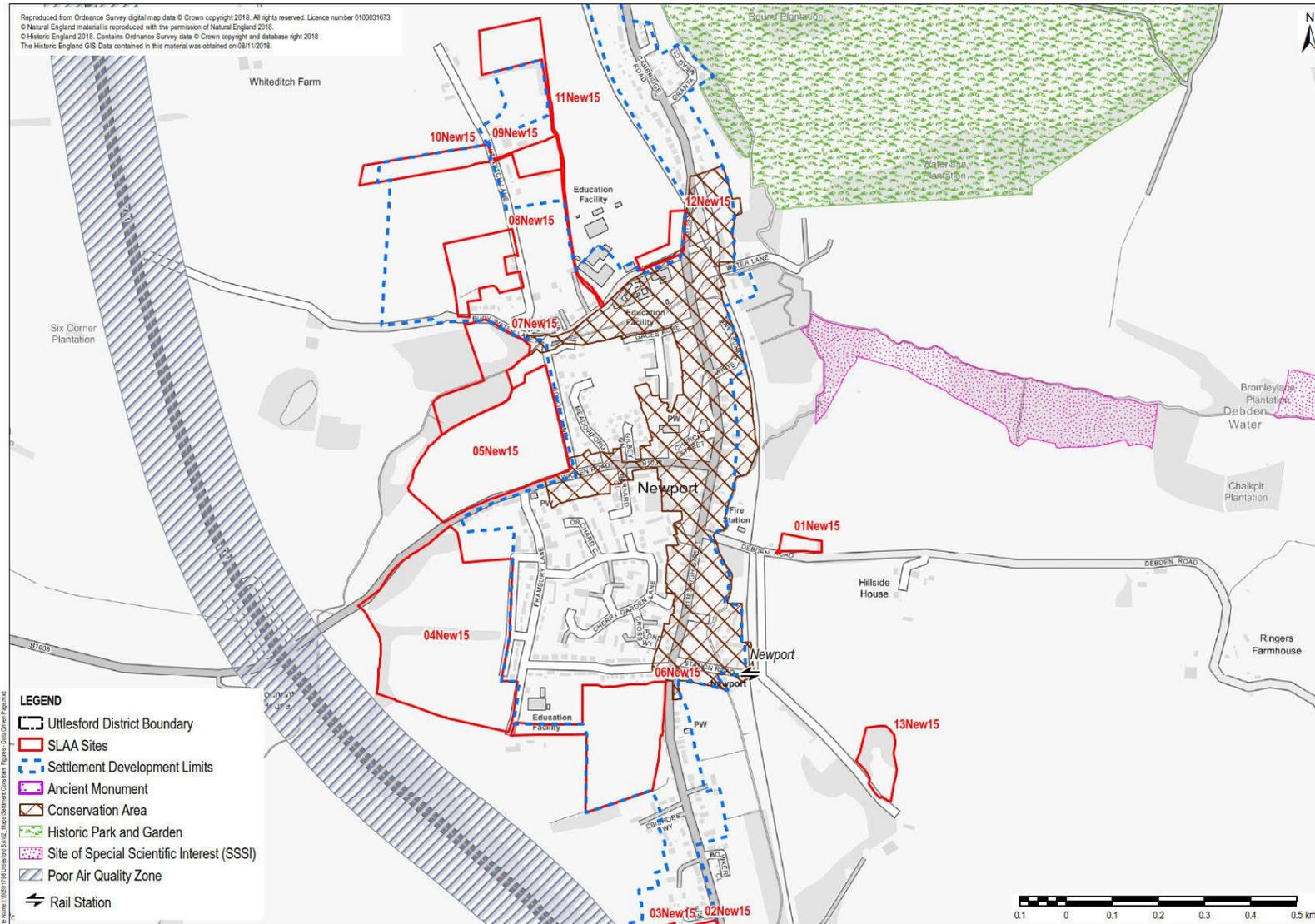
Figure 9: Hatfield Heath SLAA sites and key constraints



Newport

- 8.94 Newport is identified as a Key Village in the settlement hierarchy; it also has a train station on the London Liverpool Street/ Cambridge line.
- 8.95 Between April 2011 and April 2018, a total of 90 dwellings were built in Newport. As of April 2018 there are outstanding planning permissions for a total of 301 dwellings. That gives a total of 391 dwellings that have either been built out or are committed during the plan period.
- 8.96 Based on the findings of the SLAA and wider evidence the Council identified the following sites for allocation at Newport:
- NEWP1 for 94 dwellings (06New15);
 - NEWP2 for 11 dwellings (02New15);
 - NEWP3 for 12 dwellings (committed); and
 - NEWP4 for 81 extra care units (07New15).
- 8.97 The committed development/ sites identified above should be considered as constants for any district-wide options that explore increased growth at Newport during the plan period.
- 8.98 A significant number of sites were submitted through the Call for Sites process around the fringes of the village. The SLAA identified that site 04New15 could potentially deliver 200 dwellings and is suitable subject to assessments on the impact of development on the landscape and highways. This site has therefore been carried forward for consideration as part of an option for additional growth at Newport.
- 8.99 The SLAA found site 05New15 to not be suitable on landscape and historic environment grounds. Evidence suggests that the landscape is sensitive to change in this area and would extend development into the open countryside and the river valley. This site has not been carried forward for further consideration.
- 8.100 There are a number of smaller scale sites to the north of the settlement and these were found by the SLAA to be unsuitable for development. It is not considered appropriate to include these sites for additional growth given the findings of the SLAA and that they would not significantly contribute to the delivery of new homes during the plan period.
- 8.101 Please see **Figure 10** for the sites submitted through the Call for Sites process and assessed through the SLAA at Hatfield Heath.

Figure 10: Newport SLAA sites and key constraints

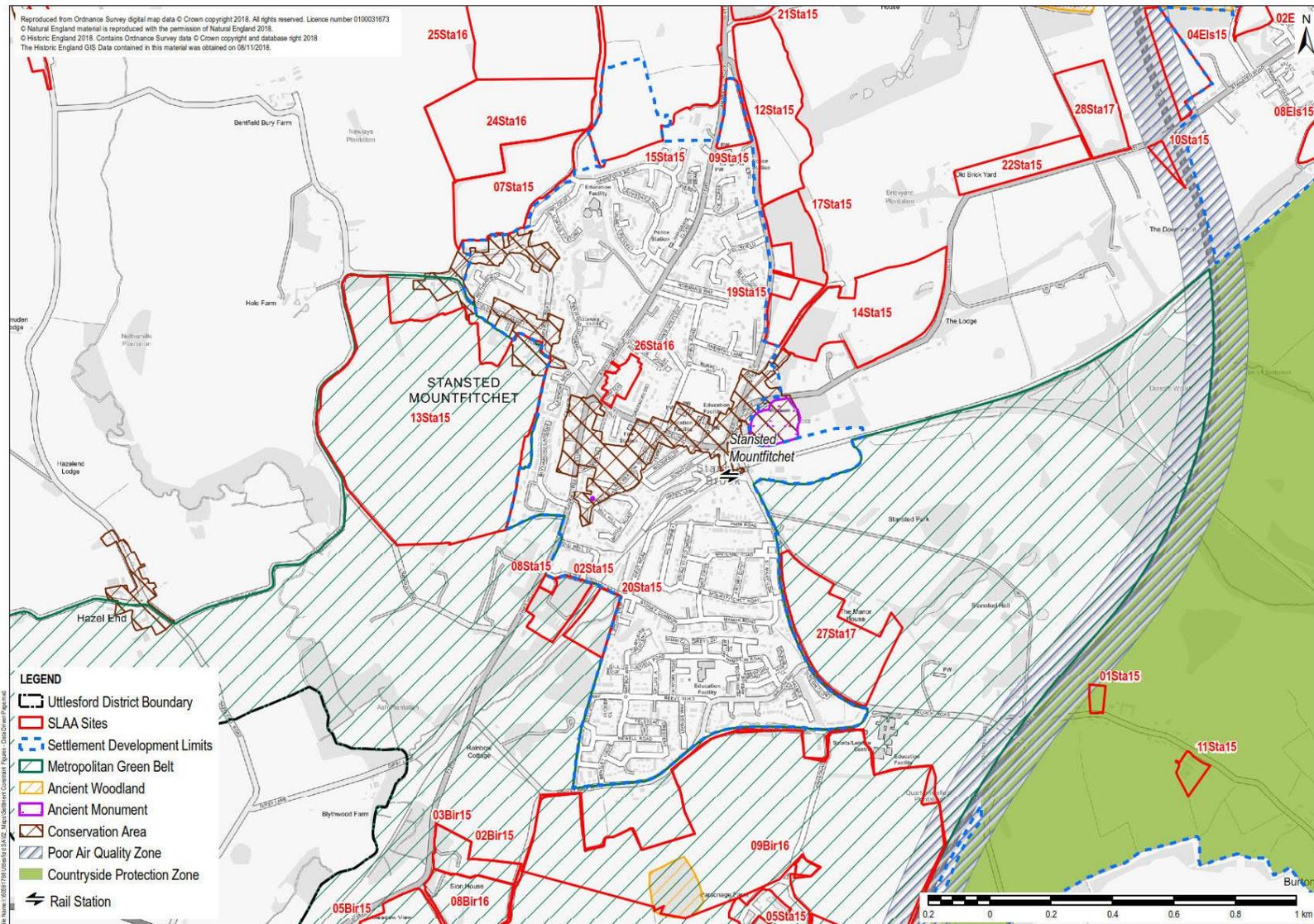


Stansted Mountfitchet

- 8.102 Stanstead Mountfitchet is identified as a Key Village in the settlement hierarchy; it also has a train station on the London Liverpool Street/ Cambridge line.
- 8.103 Between April 2011 and April 2018, a total of 427 dwellings were built in Stansted Mountfitchet. As of April 2018 there are outstanding planning permissions for a total of 155 dwellings. That gives a total of 582 dwellings that have either been built out or are committed during the plan period.
- 8.104 Based on the findings of the SLAA and wider evidence the Council identified the following sites for allocation at Stanstead Mountfitchet:
- STA1 for 40 dwellings (09Sta15); and
 - STA2 for 12 dwellings (committed).
- 8.105 The committed development/ sites identified above should be considered as constants for any district-wide options that explore increased growth at Stanstead Mountfitchet during the plan period.
- 8.106 A significant number of sites were submitted through the Call for Sites process around the fringes of the village. The GB Review (2016) found that all the areas performed strongly against the GB purposes and none should be considered for release. This includes all the sites to the south of the village up to the M11 and the A120. It also includes: site 02Sta15; 08Sta15; 13Sta15; 20Sta15 and 27Sta17. For the purposes of exploring options for the delivery of additional growth the focus will therefore be on the areas outside the GB to the north and east of the settlement.
- 8.107 The SLAA found that the sites to the east of the village were unsuitable as they would result in development beyond the current defensible boundary of High Lane. Despite this, it is considered appropriate to explore these sites further for the potential to deliver additional growth at the village. Sites 17Sta15 and 19Sta15 do not extend past Gall End Lane or the stream to the east. There is the potential to deliver approximately 50 dwellings at site 17Sta15 and 15 dwellings at site 19Sta15. There is also the potential for some additional development on site 12Sta15 to the north of these sites but this would need to be limited to the south west of the site and should not pass the stream. The potential to deliver an additional 100 dwellings in the South West section of site 12Sta15 has been carried forward. Site 14Sta15 only adjoins the settlement development limit at its western corner and would extend into an area of more rural character and introduce coalescence with Elsenham. It has therefore not been progressed as part of an option for additional growth at the village.
- 8.108 The southern part of site 15Sta15 has planning permission (UTT/13/1618/OP) for 160 dwellings and other uses. The SHLAA found that a larger extension of the site to deliver 300 dwellings and other uses would be unsuitable as it would introduce a tongue of development extending into the countryside.
- 8.109 Site 07Sta15 adjoins the Bentfield Green Conservation Area. The site was subject to an application (UTT/13/1203/OP) for 140 dwellings, primary school and recreational space which was refused and dismissed on appeal in 2014. The Inspector concluded that the scheme would harm the countryside north of Bentfield Green. Similarly the Inspector concluded that the development would harm the character of the conservation area which was characterised by this edge of settlement rural location. There is a proposal for a smaller scale development (70 dwellings) which moves the development away from the conservation area and the traffic would use Rainsford Road. Since the appeal decision, planning permission has been granted for 160 dwellings to the east on site 15Sta15, extending development northwards into the countryside. The potential for a smaller scale of 70 dwellings at site 07Sta15 has therefore been progressed as part of an option for increased growth at this village.
- 8.110 Site 24Sta16 was found suitable through the SLAA subject to access being delivered through site 07Sta15 to the south and the capacity of the road network. The site has a capacity of approximately 70 dwellings and has been progressed for further consideration given the inclusion of site 07Sta15.

- 8.111 Site 25Sta16 includes site 24Sta16 and extends further north. As for site 15Sta15, the SLAA found that development on site 25Sta16 would be unsuitable as it would introduce a tongue of development extending into the countryside. This site has not been considered further for the potential to deliver additional growth.
- 8.112 Please see **Figure 11** for the sites submitted through the Call for Sites process and assessed through the SLAA at Stansted Mountfitchet.

Figure 11: Stansted Mountfitchet SLAA sites and key constraints



Takeley

8.113 Takeley is identified as a Key Village in the settlement hierarchy and is situated to the south of the A120. Between April 2011 and April 2018, a total of 678 dwellings were built in Takeley/ Little Canfield. As of April 2018 there are no outstanding planning permissions.

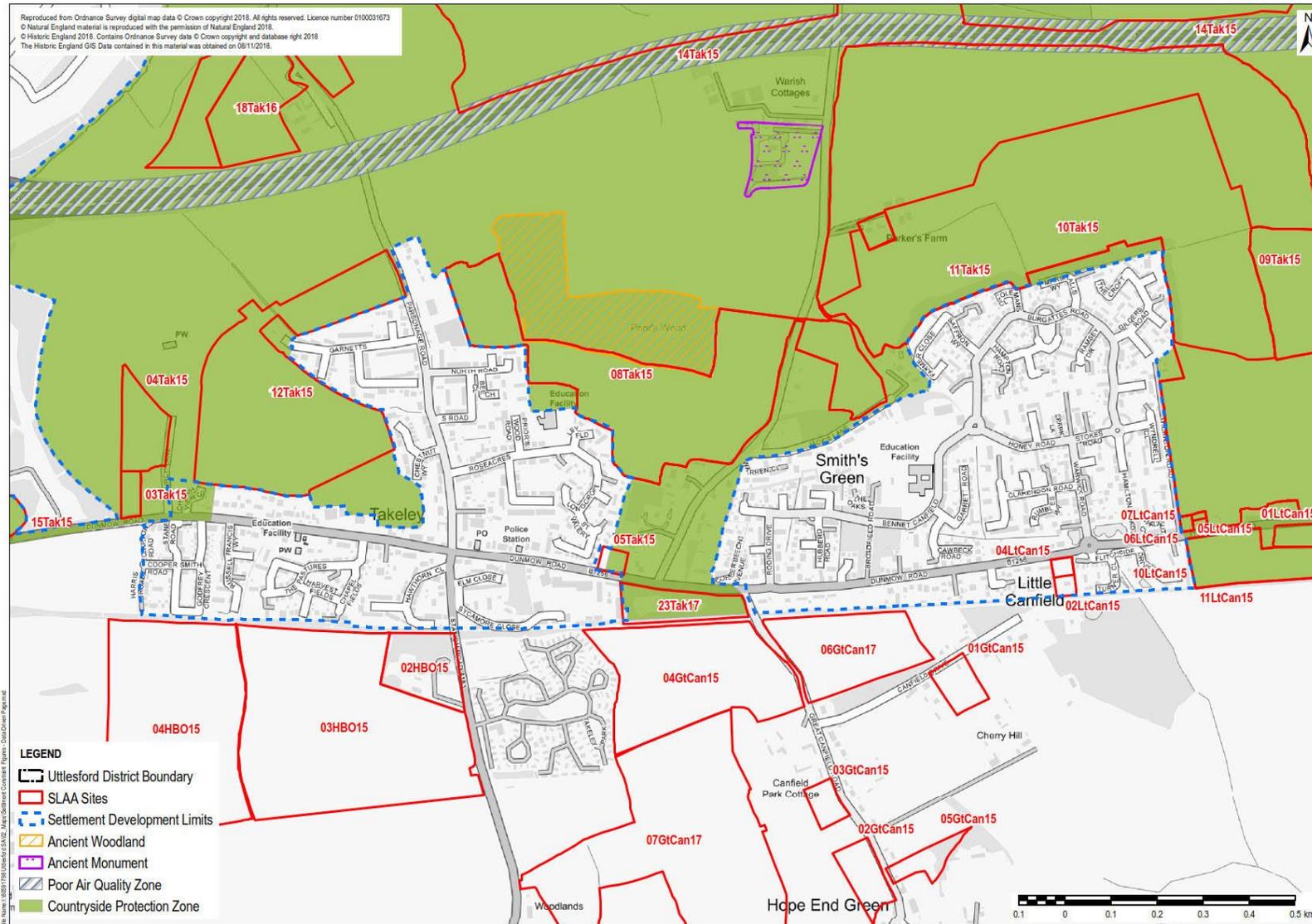
8.114 Based on the findings of the SLAA and wider evidence the Council identified the following site for allocation at Takeley:

- TAK1 for 20 dwellings (01Tak15).

8.115 The committed development/ sites identified above should be considered as constants for any district-wide options that explore increased growth at Takeley during the plan period.

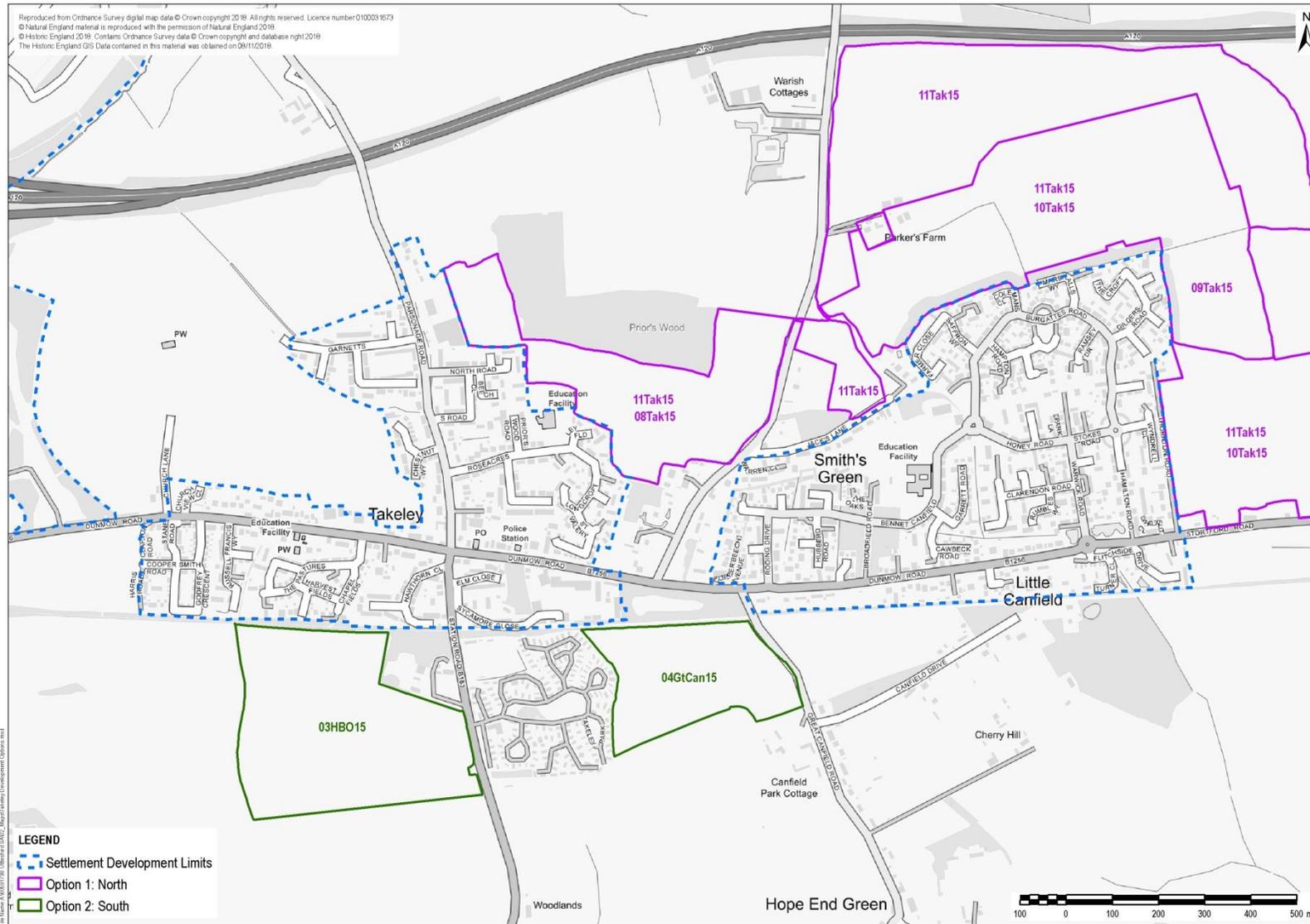
8.116 Please see **Figure 12** for the sites submitted through the Call for Sites process and assessed through the SLAA at Takeley.

Figure 12: Takeley SLAA sites and key constraints



- 8.117 A large number of sites were submitted around the fringes of Takeley through the Call for Sites process. Sites to the north of Takeley between the A120 and settlement have been promoted for large-scale development at an early stage in plan-making. Initially the sites were being promoted for 1,700 dwellings; however, a reduced scale of 850 dwellings has also been considered through plan-making and the SA process. The sites (08Tak15, 09Tak15, 10Tak15 and 11Tak15) to the North of the settlement are being actively promoted. A larger scale of development at around 1,700 dwellings is not considered realistic or reasonable given identified constraints along the B1256 and Junction 8a of the M11. There are also identified issues in terms of traffic and atmospheric pollution impacts on Hatfield Forest SSSI, which is situated adjacent to the B1256. Furthermore, the northern area also falls within the CPZ. Despite the identified constraints, it is considered reasonable to explore a reduced scale of growth that could deliver around 750 dwellings, as the area is still being actively promoted and 750 dwellings could deliver a new primary school.
- 8.118 A potential alternative to the delivery of additional growth to the north of Takeley could be comprised of growth to the south at sites 03HBO15 and 04GtCan15. 03HBO15 is a greenfield site located in the South West of the village. It wraps around the site submitted at Bonningtons (02HBO15) and forms part of an extant planning permission for a golf course, hotel, conference centre and indoor leisure facilities. It has the potential to deliver approximately 275 dwellings.
- 8.119 There have been two applications for development on site 04GtCan15 in 2014 for 211 dwellings (UTT/14/2306/OP) and 2015 for 180 dwellings (UTT/14/3705/OP), which were both refused. Permission was refused due to harm to the rural character of the area and countryside (CPZ) as well as insufficient information on access, highways and design. Despite the refusals it is considered reasonable to explore the potential for growth at this site given developer interest and the presence of Takeley Park Homes to the west. The SLAA identified that there is the capacity to deliver 211 dwellings at this site and this has been carried forward for further consideration.
- 8.120 Given the identified constraints it is not considered realistic to propose additional growth both to the north and south of Takeley. It would likely be a choice of one or the other; therefore, it is appropriate for these two options to be subject to further appraisal work prior to formulation of district-wide spatial strategy options. The two options for Takeley are identified in **Figure 13** and a description provided below:
- **Option 1:** Additional growth to the north - approx 750 dwellings distributed between sites 08Tak15, 09Tak15, 10Tak15 and 11Tak15. It is assumed that development will not cover the whole extent of the sites indicated on **Figure 13**. The option would seek to protect the countryside by keeping development to those sites adjacent to the existing development limits.
 - **Option 2:** Additional growth to the south - approx 486 dwellings at sites 03HBO15 (275 dwellings) and 04GtCan15 (211 dwellings).

Figure 13: Takeley growth options



Appraisal of the Takeley growth options

8.121 The growth options identified in **Figure 13** were subject to a comparative appraisal against the SA Framework and the detailed findings are presented in **Appendix V**. A summary of the findings is presented in **Table 8.5** below along with outline reasons for why additional growth would be preferred in the north or south of the village.

8.122 Detailed appraisal methodology is explained in **Appendix V** but in summary: The appraisal table comprises a row for each of the objectives that make up the SA Framework (see **Table 3.1**). Within each row the alternatives are categorised in terms of potential to result in 'significant effects' (using **red/ green**) and also ranked in order of relative performance (with ' = ' used to denote instances where the alternatives perform on a par, i.e. it not possible to differentiate between them). If an option is ranked as 1 then it is preferred to an option that is ranked 2. Please note that the rank is not linked to the potential for a significant effect.

Table 8.5: Summary appraisal of the Takeley growth options

Summary findings and conclusions		
SA Objective	Categorisation and rank	
	Option 1: 750 dwellings north of Takeley Village	Option 2: 486 dwellings south of Takeley Village
1: Biodiversity	2	1
2: Water quality and resources	=	=
3: Landscape	2	1
4: Soil/ sustainable use of land	2	1
5: Historic environment	2	1
6: Climate change	1	2
7: Reduce and control pollution	2	1
8: To reduce the risk of flooding	2	1
9: Sustainable methods of travel	1	2
10: Accessibility to services	1	2
11: Health and social inclusion	=	=
12: Housing	1	2
13: Resources and infrastructure	=	=
14: Education and skills	1	2
15: Employment	=	=

8.123 The appraisal found that for a number of the SA objectives, development in Takeley Village poses a risk of **significant negative effects**, and these are summarised below:

- Potential effects on designated **biodiversity**: both options are likely to increase traffic on the B1256 north of Hatfield Forest SSSI as residents will use this route to access Junction 8 of the M11 as well as access the A120. This is likely to affect traffic along the B1256 and therefore air quality at the adjacent SSSI. Given the proximity of the SSSI to the settlement, it is also likely to be subject to increased recreational pressures. In line with advice from Natural England, it is recommended that Local Plan policy provisions seek contributions towards the delivery of mitigation measures to address the likely impacts of

recreational disturbance and decreased air quality at Hatfield Forest from all development falling within the emerging Zone of Influence (ZoI) - which will include any development at Takeley.

- Material changes to the **landscape**: given the scale of growth proposed under both options at a village, it is considered that they are both likely to result in a residual significant negative effect on the character of the settlement.
- Significant loss of key **soil resources**: any development in Takeley Village is likely to result in significant loss of greenfield and Grade 2 best and most versatile agricultural land with the potential for permanent negative effects.
- Development affecting the **historic environment**: both options are likely to affect the setting of designated heritage assets in the Village with the potential for significant negative effects. Given that Option 1 is likely to impact the setting of a Grade I Listed Buildings (rarer and more significant than Grade II) and development is at a larger scale, the likely effects are considered to be of greater significance compared to Option 2.
- Impacts on **air quality**: the Transport Study predicts that without mitigation, the capacity of the B1256 will be exceeded at 2033 without development proposed through the Local Plan. Both of the options will increase traffic along the B1256 and at Junction 8 of the M11 in order to access the motorway and the A120, where there is identified congestion and existing air quality issues. The higher level of growth proposed under Option 1 is likely to have a negative effect of greater significance on traffic and therefore atmospheric pollution compared to Option 2.

8.124 The appraisal has also found that for a number of the SA objectives, development in Takeley Village presents opportunities for long term **significant positive effects**, and these are summarised below:

- Delivery of **housing** to meet the identified local needs.
- Larger scale development enabling **delivery of new infrastructure**: the delivery of 750 dwellings under Option 1 is considered to be of a sufficient scale to deliver a new primary school within the Village.

Outline reasons for selection/ rejection of Takeley growth options

8.125 On balance, Option 1 is preferred and taken forward for consideration as part of the district-wide spatial strategy options as the scale of development could provide a new primary school at the village, for which there is an identified need. The opportunity to deliver a primary school is considered to outweigh the negatives effects, which are primarily associated with an increased scale of development having greater impacts on environmental factors. Tied to this consideration is the fact that if there were to be less development in Takeley, there could be additional pressure to increase development in other more sensitive settlements.

Thaxted

8.126 Thaxted is identified as a Key Village in the settlement hierarchy and is situated in the East of the district away from strategic transport infrastructure.

8.127 Between April 2011 and April 2018, a total of 183 dwellings were built in Thaxted. As of April 2018 there are outstanding planning permissions for a total of 39 dwellings. That gives a total of 222 dwellings that have either been built out or are committed during the plan period.

8.128 Based on the findings of the SLAA and wider evidence the Council identified the following site for allocation at Thaxted:

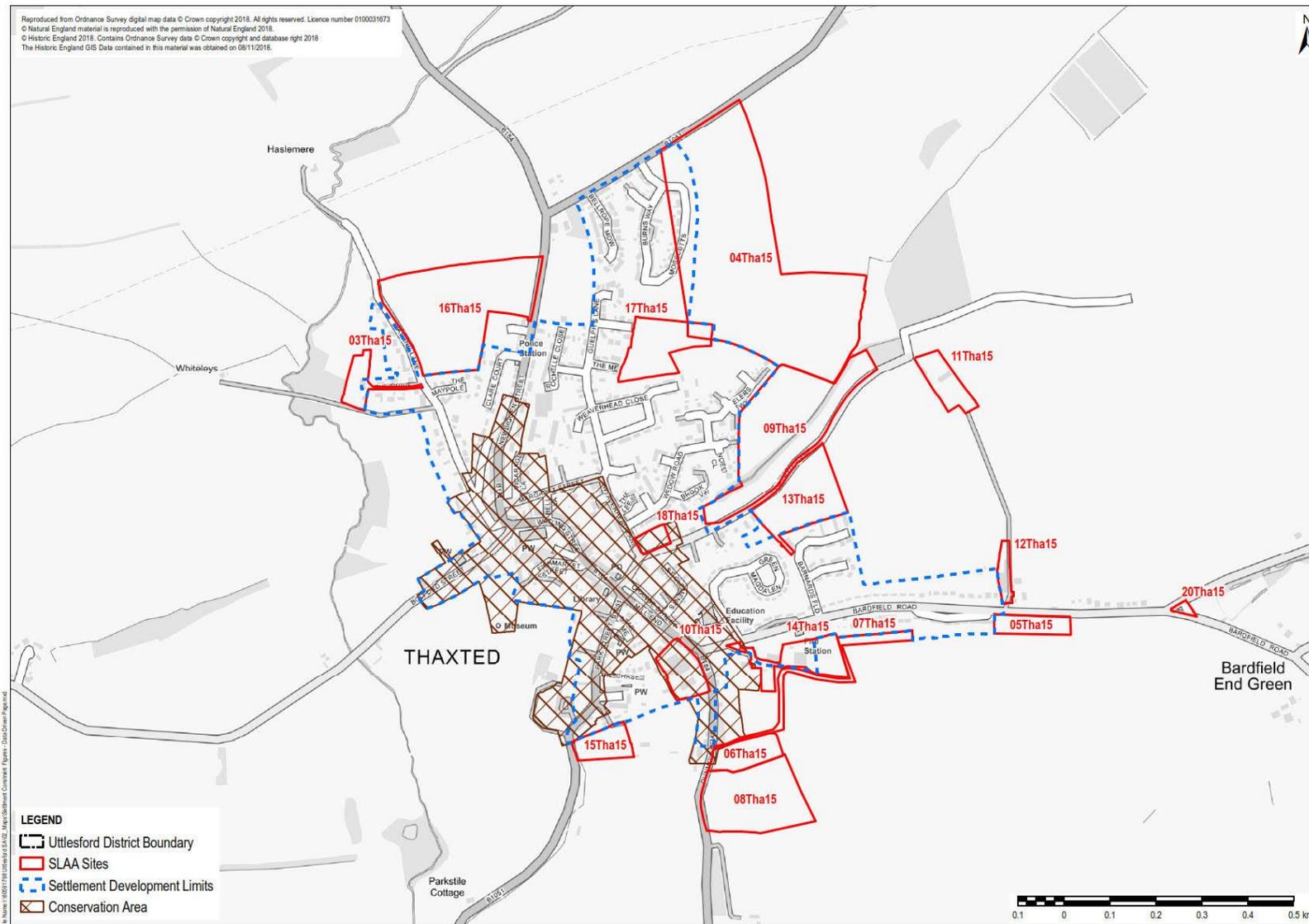
- THA1 for 20 dwellings (14Tha15).

8.129 The committed development/ sites identified above should be considered as constants for any district-wide options that explore increased growth at Thaxted during the plan period.

8.130 Despite being removed from the strategic transport network, a number of sites were submitted through the Call for Sites process either adjacent or in close proximity to the development limit

of the settlement. Please see **Figure 14** for the sites submitted through the Call for Sites process and assessed through the SLAA at Thaxted.

Figure 14: Thaxted SLAA sites and key constraints



- 8.131 An appeal was refused for the development of 120 dwellings at site 16Tha15 in 2015 (UTT/14/1033OP). The Inspector concluded that the proposed development would cause significant harm to the landscape setting of Thaxted. He considered that the extent of harm, particularly to the character and appearance of the area and the harm to the setting of the church would not constitute sustainable development in terms of the NPPF. As a result this site has not been carried forward as part of this option.
- 8.132 Site 04Tha15 was found through the SLAA to be available and achievable; however, it is ultimately unsuitable due to landscape impacts and significant impacts on the setting of the church (Grade I Listed Building). As a result of the appeal decision for site 16Tha15, this site option has not been taken forward for further consideration.
- 8.133 Sites 06Tha15 and 08Tha15 are situated to the south of the settlement and adjacent to each other. They are separated from the settlement and considered unsuitable in the SLAA. These sites have not been taken forward for further consideration.
- 8.134 Site 5Tha15 was found through the SLAA to be unsuitable as a result of flood risk and impacts on the landscape and the setting of the adjacent conservation area. This site has not been taken forward for further consideration.
- 8.135 Site 09Tha15 was found by the SLAA to be suitable subject to further assessment of the capacity of local roads. The site is currently being promoted for 23 dwellings to round off the existing development. While this will not deliver a significant level of additional growth it has nevertheless been taken forward for further consideration.
- 8.136 Site 17Tha15 is in the ownership of Essex County Council and has historically been safeguarded for school or community uses. The site is being promoted by a third party and is estimated to have capacity for 25 dwellings. While the deliverability of this site is uncertain and it cannot deliver a significant amount of additional growth, it has been taken forward for further consideration as the landownership may change or it could be promoted for residential development in the future.

Type A and B Villages

- 8.137 Between April 2011 and April 2018, a total of 525 dwellings were built in the Type A and B Villages. As of April 2018 there are outstanding planning permissions for a total of 239 dwellings. That gives a total of 764 dwellings that have either been built out or are committed during the plan period.
- 8.138 Based on the findings of the SLAA and wider evidence the Council identified the following sites for allocation at the Type A and B Villages:
- CLA1 (Clavering) for 13 dwellings (committed);
 - DEB1 (Debden) for 25 dwellings (02Deb15 & 03Deb15);
 - FEL1 (Felsted) for 40 dwellings (01Fel15);
 - FEL2 (Felsted) for 30 dwellings (17Fel15);
 - GtEAS1 (Great Easton) for 20 dwellings (04GtEas15);
 - QUE1 (Quendon and Rickling) for 19 dwellings (02Que15); and
 - STE1 (Stebbing) for 30 dwellings (committed).
- 8.139 The committed development/ sites identified above should be considered as constants for any district-wide options that explore increased growth at the Type A and B Villages during the plan period.
- 8.140 In terms of the potential for additional growth at the Type A and B Villages, the Council has indicated that there is the potential for some additional small scale growth at the following Type A and B Villages:

- Felsted - 16Fel15 (15 dwellings) and 19Fel15 (23 dwellings) as these sites are currently being actively promoted;
- Barnston - 01Bar15 (23 dwellings) is not currently being actively promoted but could be included for consideration as the decision not to recommend allocation of this site was marginal; and
- Clavering - 07Cla15 (30 dwellings) as this site is currently being actively promoted.

8.141 These sites have been carried forward for further consideration as part of establishing district-wide spatial strategy alternatives.

8.142 While it is not considered necessary to explore each Type A and B Village individually, there is large-scale growth being promoted at the villages of Little Dunmow and Flitch Green that warrant further discussion. Furthermore, it would also be prudent to re-consider the potential for growth at Birchanger Village given that it was identified as an Area of Search for a new settlement in 2015 and considered further in 2016 but eventually rejected.

Birchanger

8.143 Birchanger is a Type A Village in the settlement hierarchy. It is situated in the south of Stanstead Mountfitchet and north of Bishop's Stortford and is surrounded by the Green Belt.

8.144 While a number of sites were submitted through the Call for Sites, essentially surrounding the settlement, they all fell within the GB. The GB Review (2016) found that the parcels of land for which these sites fall within perform strongly against the GB purposes and did not recommend that any areas be considered for release.

8.145 Taken the above into account it is considered that there is no potential for additional growth given the findings of the GB Review and that any significant growth would be likely to lead to coalescence with Stanstead Mountfitchet and Bishop's Stortford.

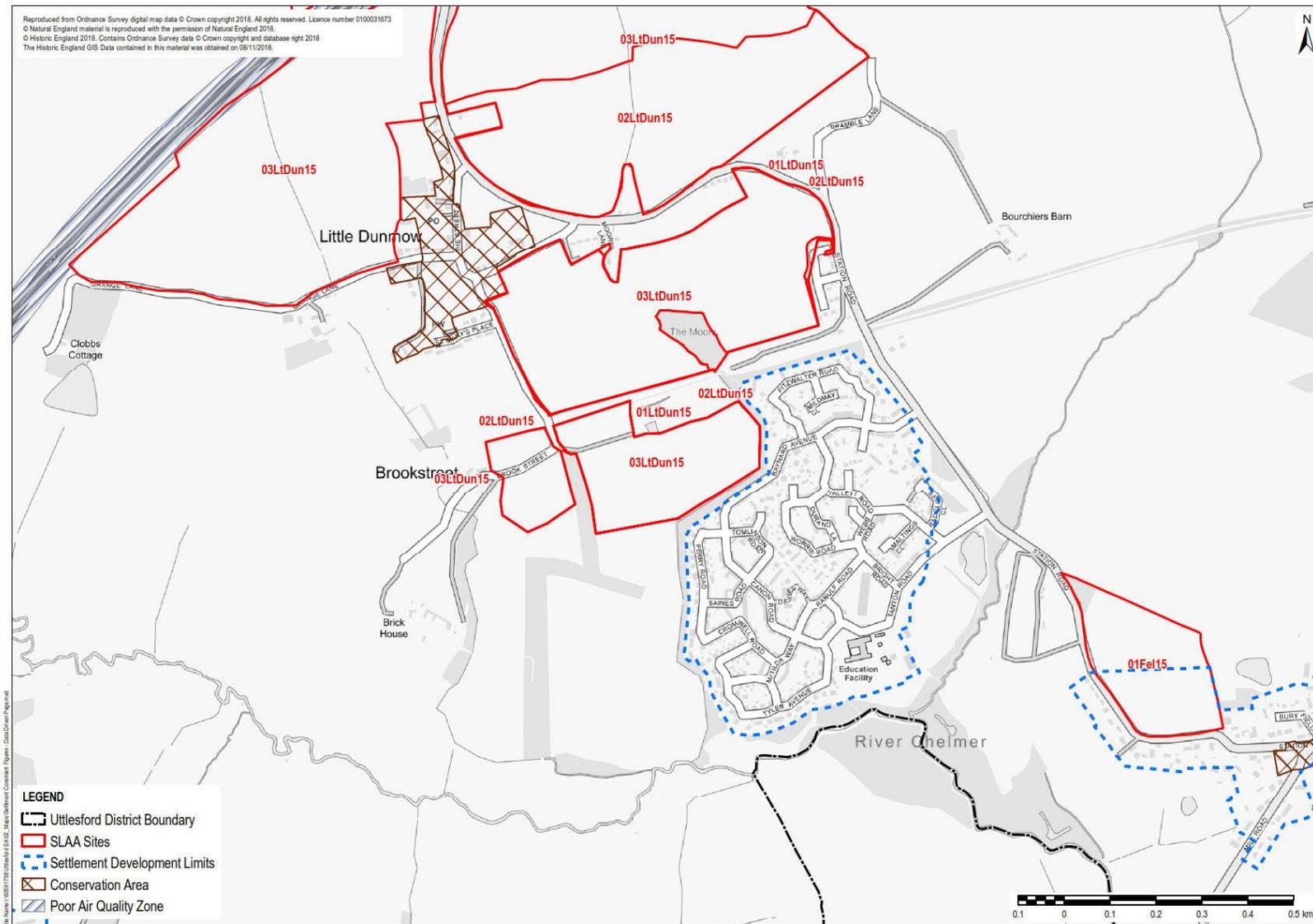
Little Dunmow and Flitch Green

8.146 A number of sites were submitted through the Call for Sites process between the A120 and Little Dunmow (Type B Village) as well as between Flitch Green (Type A Village) and Little Dunmow. Please see **Figure 15** for the sites submitted through the Call for Sites process and assessed through the SLAA at Little Dunmow and Flitch Green.

8.147 Various scales of development have previously been promoted and therefore considered in this area through plan-making/ SA process, including for 1,020, 1,500 and 2,700 dwellings. Development in this area has previously been referred to as 'Chelmer Mead' and was considered at previous stages in the plan-making/ SA process as a potential Garden Community option (please refer to Chapter 6 and 7 in this SA Report). One of the key issues for large-scale growth in this location is providing suitable access to the A120. It is understood that even the maximum scale of growth at around 3,000 dwellings would not be a sufficient scale to deliver a new junction onto the A120.

8.148 The sites between Little Dunmow and Flitch Green should not been taken forward for further consideration as development would result in the coalescence of the two villages. While it is recognised that there are still significant issues to delivering large-scale growth in this area, given that the sites to the North are being actively promoted it is considered prudent to take forward a reduced scale of growth for further consideration. Additional growth of 750 dwellings to the North of Little Dunmow (sites 02LtDun15 and 03LTDun15) has been taken forward as it would be able to provide a new primary school as well as avoid coalescence with Flitch Green to the south.

Figure 15: Little Dunmow and Fitch Green SLAA sites and key constraints



Establishing the Reasonable Alternatives

Spatial strategy options

- 8.149 The evidence around housing supply has been updated and indicates that, as of April 2018, there have been 4,156 dwellings already built since the beginning of the plan period (April 2011). A further 3,364 dwellings have been granted planning permission. Including a windfall allowance of 1,050 dwellings (between 2018/19 and 2023/33), the total supply is therefore 8,570 dwellings.
- 8.150 The identified OAHN for the plan period is at least 14,000 new homes, plus the required 5% buffer to allow for flexibility gives a total housing requirement of at least 14,700 new homes for the plan period. Take the housing supply away and we are left with a shortfall or residual housing requirement of at least 6,130 dwellings during the life of the Local Plan.
- 8.151 Based on the evidence base, in particular the SLAA, the Council has sought to meet as much of this residual need on sites located at the main towns and villages in line with the settlement hierarchy and the identified development limits. The Regulation 19 Pre-Submission Local Plan proposes the delivery of an additional 1,082 dwellings at the main towns and 478 dwellings at the villages in line with the settlement hierarchy. Evidence suggests that significant additional growth at the main towns and villages is not possible due to constraints, and, if it were pursued there is a high likelihood of significant impacts on existing infrastructure and the setting of historic settlements. Based on the level of growth allocated at the main towns and villages there is still a residual requirement of 4,750 dwellings.
- 8.152 Taking this into account, the Council explored opportunities for the delivery of one or more new settlements from an early stage in plan-making. Only three GC options were identified at North Uttlesford, Easton Park and West of Braintree that could deliver the minimum threshold of 5,000 dwellings that would provide a higher order secondary school in line with comments from ECC. Evidence on the delivery of housing at these sites demonstrates that they each could only deliver a proportion of their total capacity during the plan period. As a result, in order to meet the residual housing requirement during the plan period there was a need to progress all three realistic options for new Garden Communities.
- 8.153 Building on the previous work set out in Chapters 5, 6 and 7, and in light of the discussion above, Officers and AECOM (working in collaboration) were able to establish reasonable spatial strategy alternatives - i.e. a series of alternative packages of sites - for appraisal.
- 8.154 A number of representations on the emerging Local Plan raised concerns that it places too much reliance on the GCs for the delivery of new homes during the plan period, referring to research on the speed and rate of delivery of large-scale housing.⁷¹ Taking this into account, it was therefore considered prudent to also explore alternatives that rely less on the delivery of GCs during the plan period.
- 8.155 Representations have also suggested that there should be additional growth directed towards the main towns and villages instead of the new GCs, despite the evidence demonstrating that this could have significant impacts on infrastructure capacity and the environment. As demonstrated earlier in this Chapter, further consideration has therefore been given to the potential for additional growth at these settlements.
- 8.156 It should be noted that there could be any number of different permutations of spatial strategy alternatives. However, it is important that the alternatives are suitably distinct in order to allow a meaningful appraisal to be carried out. The recent Inspector's Report for the West Oxfordshire District Local Plan stated in Paragraph 27 that:

"In practice there is an almost limitless number of combinations of comparative assessments which could be undertaken across the full breadth of options for the plan's overall spatial strategy, for broad directions of growth at the main settlements and for strategic and non-

⁷¹ Nathaniel Litchfields & partners (2016) Start to Finish - How Quickly do Large-Scale Housing Sites Deliver?
<https://lichfields.uk/media/1728/start-to-finish.pdf>

strategic site allocations. However, that this appraisal work could, in theory, be undertaken does not mean that it is necessary for the SA to be legally compliant”.

8.157 Taking the above into account, four alternative spatial strategy options were identified and these are described in more detail below.

8.158 It is important to remember that a large proportion of development proposed under each of the options is comprised of committed development (completions, sites with existing planning permission and windfall). It is also important to note that the level of growth allocated at the main towns and villages through the Regulation 19 Pre-submission Plan is considered a constant for each option. The variation between options therefore reflects the following:

- Reduced delivery at the Garden Communities during the plan period;
- No Garden Communities delivered during the plan period; and
- Additional growth at the main towns and settlements, including the release of Green Belt land on the edge of Bishop’s Stortford during the plan period.

Option 1: Preferred Option

8.159 This is the development strategy set out in the Regulation 19 Pre-submission Local Plan. It is a hybrid strategy with significant growth in three new settlements, but some additional growth in existing communities as well in line with the settlement hierarchy. The strategy recognises that the towns and larger villages offer sustainable locations for development but that there are significant constraints that limit large-scale town or village extensions. The approach seeks to realise the infrastructure benefits of concentrating development in new settlements as well as limiting the impact on existing communities.

Option 2: Reduced reliance on Garden Communities during the plan period

8.160 This option was developed to explore potential alternatives for meeting the residual housing requirement if the GCs delivered less housing during the plan period (up to 2033). This option assumes that the start date for the delivery of each GC is delayed by three years, which would result in a reduction of approximately 800 dwellings at both Easton Park and North Uttlesford GCs as well as 450 dwellings at the West of Braintree GC during the plan period. This leaves a residual total of 2,050 dwellings to meet the housing requirement of 14,700 dwellings. Two variations of this option were explored and further details are provided below.

Option 2a: Reduced reliance on Garden Communities and greater focus on Market Towns and Key Villages (with a railway station)

8.161 In seeking to meet the residual housing need from reduced delivery at the GCs, it was considered appropriate to first consider the potential for additional growth at the Main Towns, including land adjacent to Bishop’s Stortford which falls just outside the district boundary. Following that, the potential for additional growth at the Key Villages with a train station was explored. Under this option the shortfall as a result of reduced delivery at the GCs during the plan period is made up by additional growth in the following areas:

- **Edge of Bishop’s Stortford** - Additional growth delivered on sites 06Bir15 (350 dwellings) and 03GtHal15 (180 dwellings), which are both GB sites. A total of 530 dwellings.
- **Saffron Walden** - Additional growth delivered on sites 11Saf15 (100 dwellings) and 20Saf15 (100 dwellings). Including development proposed through Option 1 that gives a total of 515 dwellings for this settlement.
- **Great Dunmow** - Additional growth delivered on sites 09GtDun15 (80 dwellings) and 11GtDun15 (35 dwellings). Including development proposed through Option 1 that gives a total of 882 dwellings for this settlement.
- **Elsenham** - Additional growth delivered on sites 03Els15 (100 dwellings), 11Els17 (40 dwellings) and 06Els15 (350 dwellings). Including development proposed through Option 1 that gives a total of 660 dwellings for this settlement.
- **Great Chesterford** - Additional growth delivered at sites 03LtChe15 (200 dwellings) and 04LtChe15 (100 dwellings). Including development proposed through Option 1 that gives a total of 300 dwellings for this settlement.

- **Newport** - Additional growth delivered on site 04New15 (106 dwellings). Including development proposed through Option 1 that gives a total of 200 dwellings for this settlement.
- **Stanstead Mountfitchet** - Additional growth delivered on sites 07Sta15 (70 dwellings), 12Sta15 (100 dwellings), 17Sta15 (50 dwellings), 19Sta15 (15 dwellings) and 24Sta16 (70 dwellings). Including development proposed through Option 1 that gives a total of 345 dwellings for this settlement.

Option 2a: Reduced reliance on Garden Communities and greater focus on Villages where large-scale growth is being promoted

8.162 A large number of sites were submitted around the Key Villages without a train station and around some Type A and B villages through the Call for Sites process. Option 2b seeks to explore the potential for these sites to help meet the shortfall as a result of a reduced reliance on GCs during the plan period. Under this option the shortfall as a result of reduced delivery at the GCs during the plan period is made up by additional growth in the following areas:

- **Hatfield Heath** - Additional growth delivered at site 04HHEA15 (26 dwellings). Just the smaller PDL area of the site being promoted. A total of 26 dwellings.
- **Takeley** - Additional growth on sites to the north for 750 dwellings as could provide a new primary school (Parts of sites 08Tak15, 09Tak15, 10Tak15 and 11Tak15). Including development proposed through Option 1 that gives a total of 770 dwellings for this settlement.
- **Thaxted** - Additional growth delivered on sites 09Tha15 (23 dwellings) and 17Tha15 (25 dwellings). Including development proposed through Option 1 that gives a total of 68 dwellings for this settlement.
- **Type A and B Villages:**
 - **Little Dunmow:** Additional growth delivered on sites to the north of Little Dunmow (sites 02LtDun15 and 03LTDun15 (750 dwellings) previously referred to as Chelmer Mead;
 - **Felsted:** Additional growth delivered at 16Fel15 (15 dwellings) and 19Fel15 (23 dwellings);
 - **Barnston:** Additional growth delivered at 01Bar15 (23 dwellings); and
 - **Clavering:** Additional growth delivered at 07Cla15 (30 dwellings).
 - Including development proposed through Option 1 that gives a total of 975 dwellings for the Type A and B Villages.

Option 3: No Garden Communities

8.163 This option was developed to explore potential alternatives for meeting the residual housing requirement if the GCs do not deliver any housing during the plan period (up to 2033). Given the significant shortfall in the housing requirement this option would require all the additional growth identified above for Options 2a and 2b. Without the delivery of the GCs there is also the opportunity for additional growth in the following areas:

- **Great Dunmow** - Additional growth delivered at site 05LtEast15 (1,000 dwellings) as coalescence with the Easton Park GC is no longer an issue. Including development proposed through Option 1 and 2a that gives a total of 1,882 dwellings for this settlement.

8.164 **Table 8.6** on the following page sets out the four options in more detail.

8.165 It could be argued that additional options should be explored that include the delivery of just one or perhaps two of the three GC options. Particularly given Historic England's objection to the North Uttlesford GC in response to the Regulation 19 Pre-submission Local Plan. However, it is important to note that a comparative and independent appraisal of the three GC options has been carried out and this included variations in the total scale of growth that might be delivered at each of the options where feasible. The summary appraisal findings are presented earlier in Chapter 8 and the detailed appraisal tables provided in **Appendix V** and this worked

informed the development of the spatial strategy options. Furthermore, the four identified alternative spatial strategy options allow the SA to evaluate the likely significant effects and explore the differences between options that focus less or no growth at the GCs compared to increased growth and the district's towns and villages. It is therefore not considered necessary to identify and appraise any additional options.

Table 8.6: The reasonable spatial strategy alternatives

	Option 1: Preferred option	Option 2a: Reduced reliance on GCs greater focus on Towns / Key Villages (with a train station)	Option 2b: Reduced reliance on GCs greater focus on other Villages	Option 3: No Garden Communities
Constants				
Completions (April 2018)	4,156	4,156	4,156	4,156
Permissions (April 2018)	3,364	3,364	3,364	3,364
Windfall (2018/19 - 2032/33)	1,050	1,050	1,050	1,050
Constants Total	8,570	8,570	8,570	8,570
Choices				
Towns				
Edge of Bishop's Stortford	0	530	0	530
Saffron Walden	315	515	315	515
Great Dunmow	767	882	767	1,882
Town Total	1,082	1,927	1,082	2,927
Villages				
Elsenham	170	660	170	660
Great Chesterford	0	300	0	300
Hatfield Heath	0	0	26	26
Newport	94	200	94	200
Stanstead Mountfitchet	40	345	40	345
Takeley	20	20	770	770
Thaxted	20	20	68	68
A and B Villages	134	134	975	975
Village Total	478	1,679	2,143	3,344
Garden Communities				
Easton Park	1,925	1,125	1,125	0
North Uttlesford	1,925	1,125	1,125	0
West of Braintree	970	520	520	0
Garden Communities Total (up to 2033)	4,820	2,770	2,770	0
Total dwellings during the plan period	14,950	14,946	14,565	14,841
% over OAHN (14,000 dwellings)	7%	7%	4%	6%

Employment land options

8.166 Compared to the outputs of the ELR (2017) and FEMA study (2017) the Regulation 19 Pre-Submission Local Plan includes substantial over provision in purely quantitative terms. This is largely a result of large allocations at North Stansted and Chesterford Research Park.

8.167 The enlargement of the allocation at Chesterford Research Park is a given in all scenarios, as this is the only large-scale Science Park in the district and it is linked with the successful 'Cambridge phenomenon', growth here is able to provide highly skilled jobs that will support the local and national economy. The options in the area of the airport regarding the location of strategic employment land to meet the needs of the district is between allocating land at North Stansted and allocating land at Gaunt's End. North Stansted is an area with existing structure that is currently reserved for 'airport related uses'; however, this has been the case for a long time, and it is apparent that there is no need for this land for airport related uses. Gaunt's End is an area to the north of the airport within the Countryside Protection Zone that has a significant existing permission for new office and retail space. The proposal at Gaunt's End is to expand the site for further employment space, beyond the existing extant permission.

8.168 At this stage, the reasonable options for the allocation of strategic employment land are as follows:

- **Option 1:** Allocating employment land at Chesterford Research Park and North Stansted;
- **Option 2:** Allocating employment land at Chesterford Research Park and Gaunt's End;
and
- **Option 3:** Allocating employment land at Chesterford Research Park, North Stansted and Gaunt's End.

Appraisal of the Reasonable Alternatives

Spatial strategy options

8.169 The spatial strategy options identified in **Table 8.6** were subject to a comparative appraisal against the SA Framework and the detailed findings are presented in **Appendix V**. A summary of the findings is presented in **Table 8.7** below.

8.170 Detailed appraisal methodology is explained in **Appendix V** but in summary: The appraisal table comprises a row for each of the objectives that make up the SA Framework (see **Table 3.1**). Within each row the alternatives are categorised in terms of potential to result in 'significant effects' (using **red/ green**) and also ranked in order of relative performance (with ' = ' used to denote instances where the alternatives perform on a par, i.e. it not possible to differentiate between them). If an option is ranked as 1 then it is preferred to an option that is ranked 2. Please note that the rank is not linked to the potential for a significant effect.

Table 8.7: Summary appraisal of the spatial strategy options

Summary findings and conclusions				
SA Objective	Categorisation and rank			
	Option 1: Preferred option	Option 2a: Less at GCs more at Towns/ Villages (with a train station)	Option 2b: Less at GCs more at other Villages	Option 3: No Garden Communities
1: Biodiversity	1	2	3	4
2: Water quality and resources	=	=	=	=
3: Landscape	=	=	=	=
4: Soil/ sustainable use of land	=	=	=	=
5: Historic environment	=	=	=	=
6: Climate change	1	1	2	3
7: Reduce and control pollution	1	2	3	4
8: To reduce the risk of flooding	=	=	=	=
9: Sustainable methods of travel	1	1	2	3
10: Accessibility to services	1	2	3	4
11: Health and social inclusion	1	2	2	3
12: Housing	2	1	1	1
13: Resources and infrastructure	1	1	1	2
14: Education and skills	1	2	2	3
15: Employment	1	1	1	2

8.171 The appraisal found that for a number of the SA objectives, the spatial strategy options have the potential for a **significant negative effect**, and these are summarised below:

- Potential effects on designated **biodiversity**: all of the options will result in localised impacts on biodiversity where development is focussed as a result of the loss and fragmentation of habitats as well as increased disturbance (noise, light and recreation) to habitats/ species. Natural England (NE) raised two key issues that need to be addressed in relation to the development proposed through the emerging Local Plan; increased atmospheric pollution and recreational pressure to Epping Forest SSSI and SAC and Hatfield Forest SSSI. Uttlesford District falls outside the 6.2km zone of influence for recreational pressure impacts to Epping Forest SAC and SSSI so NE is satisfied that this

issue can be screened out for the emerging Local Plan. The issue of increased atmospheric pollution to the Epping Forest SAC and SSSI is being addressed through the HRA process for the Local Plan. The National Trust, who own and manage Hatfield Forest SSSI and National Nature Reserve (NNR), commissioned visitor surveys that demonstrate that there is unsustainable recreational pressure, in the winter months, which is damaging parts of Hatfield Forest. The findings of the winter visitor survey show a zone of influence (Zol) for recreational pressure of 10.4 km radius from the site, and this zone may extend further once summer visitor surveys have been analysed. Natural England advises that the Uttlesford Local Plan should include policy requirements for development within the Zol (once fully defined) to provide a contribution towards delivery of appropriate mitigation measures, once agreed. Taking the above into account, it is reasonable to assume that the spatial strategy options which direct a higher level of growth within the emerging Zol are more likely to have impacts at Hatfield Forest SSSI in terms of increased recreational pressure. This is an issue for additional growth proposed at a number of settlements (edge of Bishop's Stortford, Great Dunmow, Stansted Mountfitchet, Elsenham, Takeley, Hatfield Heath and Little Dunmow) and Easton Park GC, and options that direct more development towards these settlements (Options 2b and 3) are considered to have the greatest potential for significant negative effects.

- Material changes to the **landscape**: all options are predicted to have a residual significant negative effect as a result of the introduction of development in previously undeveloped areas. It is noted however that the overall significance of the effects will ultimately be dependent upon the design/ layout of development as well as the implementation of mitigation measures. Options 2a, 2b and in particular 3 are more likely to have impacts on the landscape character surrounding and townscape of the towns and villages.
- Significant loss of key **soil resources**: all options will result in significant loss of greenfield and Grade 2 Best and Most Versatile agricultural land with the potential for permanent negative effects.
- Development affecting the **historic environment**: all of the options will result in localised impacts on the historic environment depending on where the additional growth is directed and all are predicted to have a residual significant negative effect. While the development of the GCs, in particular the North Uttlesford GC, has the potential for a significant negative effect on the historic environment; the alternatives of reducing or delivering no growth at the GCs and increasing the scale of growth at the historic towns and villages within the district is also likely to result in a significant negative effect on the historic environment.
- Capturing benefits in terms of **infrastructure delivery**: Option 3 is also predicted to lead to significant negative effects on SA Objectives 7, 13 & 14 as will not help to reduce the need to travel and will not encourage a modal shift to the use of sustainable transport modes. It is more likely to continue the current trend of private vehicle use and does not capitalise on opportunities to deliver new physical and social infrastructure as a result of large-scale development; such as the delivery of the Rapid Transit System (RTS) and new secondary schools to serve the district.

8.172 The appraisal has also found that for a number of the SA objectives, the spatial strategy options present opportunities for long term **significant positive effects**, and these are summarised below:

- Significant delivery of **housing** to meet the identified local needs: all options will significantly contribute to meeting housing needs. However, Options 2a, 2b and 3 are preferred as they are more likely to deliver housing earlier in the plan period, and thus reduce risk overall in terms of meeting identified needs.
- Larger-scale development enabling **delivery of new infrastructure**: larger scale growth proposed under Options 1, 2a and 2b provide significant opportunity to deliver improvements to social and physical infrastructure when compared to the smaller scale development proposed under Option 3.
- Developing in **accessible locations**: Options 1 and 2a are considered to have the potential for significant long term positive effects for accessibility and climate change

mitigation as they are more likely to promote sustainable transport modes and reduce the need to travel.

Strategic employment land

8.173 The employment options identified in **paragraph 8.165** were subject to a comparative appraisal against the SA Framework and the detailed findings are presented in **Appendix V**. A summary of the findings is presented in **Table 8.8** below.

Table 8.8: Summary appraisal of the strategic employment land options

Summary findings and conclusions			
SA Objective	Categorisation and rank		
	Option 1: Strategic employment allocations at Chesterford Research Park and North Stansted	Option 2: Strategic employment allocations at Chesterford Research Park and Gaunt's End	Option 3: Strategic employment allocations at Chesterford Research Park, North Stansted and Gaunt's End
1: Biodiversity	1	1	2
2: Water quality and resources	=	=	=
3: Landscape	1	2	3
4: Soil/ sustainable use of land	1	2	2
5: Historic environment	1	2	3
6: Climate change	2	1	3
7: Reduce and control pollution	1	1	2
8: To reduce the risk of flooding	2	1	2
9: Sustainable methods of travel	2	1	2
10: Accessibility to services	=	=	=
11: Health and social inclusion	=	=	=
12: Housing	=	=	=
13: Resources and infrastructure	2	1	3
14: Education and skills	=	=	=
15: Employment	=	=	=

8.174 The appraisal found that for a number of the SA objectives, the options have the potential for a **significant negative effect** and these are summarised below:

- Significant loss of key **soil resources**: development at any of the allocations is likely to result in the loss of Grade 2 best and most versatile agricultural land with the potential for permanent negative effects. This loss is considered most significant at the Gaunt's End site.
- Development affecting the **historic environment**: there is a listed building at the Gaunt's End site and its setting is likely to be significantly affected by development. Whilst it is anticipated that the listed building will be retained on site, the type of development proposed (employment land) is considered likely to affect the setting of the listed building, which is a one storey timber framed cottage located in the centre of the site.
- Impacts on **air quality**: options are considered likely to increase traffic on the M11 and congestion around Junctions 8 and 9, which are all sensitive air quality areas. In this respect, development is considered likely to exacerbate existing air quality issues with the potential for significant long term negative effects. Overall, there are no significant

differences between Options 1 and 2; however, Option 3 is considered to perform worse due to the greater scale of development and therefore increased levels of traffic and congestion.

- 8.175 The appraisal has also found that the delivery of strategic employment land to meet the identified needs (to include a buffer) has the potential for long term **significant positive effects** on SA Objective 15 relating to the economy.

Developing the preferred approach

Introduction

8.176 This Chapter presents the Council's response to the alternatives appraisal and the Council's reasons for selecting its preferred approach in light of alternatives appraisal and other factors.

The Council's outline reasons for choosing the preferred approach

Spatial strategy

8.177 The following text is in the form of a general discussion of the reasoning and justification behind the preferred option.

8.178 The preferred approach is a hybrid strategy that seeks to focus development at the existing market towns of Saffron Walden and Great Dunmow and the three new Garden Communities of Easton Park, North Uttlesford and West of Braintree. This seeks to focus development on the most sustainable locations as to minimise the need to travel and maximise the opportunities for trips by sustainable modes. Significant development in the new Garden Communities also seeks to meet the housing needs of the district while minimising the impact of new development on existing communities, which have seen substantial impacts in recent years through incremental growth. Focussing development in the Garden Communities also provides better opportunities for upfront, deliverable infrastructure provision for meeting the needs of the development than the alternative options.

8.179 Significant additional levels of development at the market towns, beyond the preferred approach, is not preferred as the transport and air quality issues in Saffron Walden are limiting as well as the heritage and landscape restraints to the north and west; and the levels of committed development in Great Dunmow means that further development is likely to have significant negative impacts. Further development at the Key Villages with a railway station is also not preferred. Development around these villages is likely to have significant negative impacts on heritage, coalescence with surrounding villages, furthermore, the development is likely to further impact on local infrastructure without being of a suitable scale to provide new secondary schools or other required improvements. In particular: Elsenham has significant access and transport issues; Great Chesterford has heritage assets to the north, and potential coalescence to the south; Hatfield Heath is surrounded by Green Belt; Newport has landscape and heritage constraints; Stansted Mountfitchet has Green Belt to the south, and further development to the north or east risks coalescence with Elsenham and development being too far away from the core of the village and railway station; development at Takeley is likely to greater have impacts on Hatfield Forest, and potential impacts on the Countryside Protection Zone; and development at Thaxted is likely to have significant landscape and heritage impacts.

Strategic employment land

8.180 The enlargement of the allocation at Chesterford Research Park is a given in all scenarios, as this is the only large-scale Science Park in the district and it is linked with the successful 'Cambridge phenomenon', growth here is able to provide highly skilled jobs that will support the local and national economy. The options in the area of the airport regarding the location of strategic employment land to meet the needs of the district is between allocating land at North Stansted and allocating land at Gaunt's End. North Stansted is an area with existing structure that is currently reserved for 'airport related uses', however this has been the case for a long time, and it is apparent that there is no need for this land for airport related uses. Gaunt's End is an area to the north of the airport within the Countryside Protection Zone that has a significant existing permission for new office and retail space. The proposal at Gaunt's End is to expand the site for further employment space, beyond the existing extant permission. North Stansted is the preferred option as this is an area of previously developed land not within the Countryside Protection Zone (CPZ). The CPZ is a longstanding policy that seeks to ensure the Stansted Airport remains and 'airport within the countryside', further encroachment at Gaunt's End undermines the purposes on the CPZ.

Part 2: What are the SA findings
at this current stage?

9. Introduction (to Part 2)

9.1 The aim of this chapter is to present an appraisal of the Submission Local Plan, as currently presented in the Regulation 19 Pre-Submission Plan and Addendum of Focussed Changes.

Methodology

9.2 The appraisal identifies and evaluates 'likely significant effects' of the plan on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.1**) as a methodological framework. In total, there are 15 sustainability objectives as follows:

- 1) To conserve and enhance biodiversity (habitats, species and ecosystems) within the District
- 2) To conserve and enhance water quality and resources and help achieve the objectives of the Water Framework Directive
- 3) To conserve and enhance the District's landscape character and townscapes
- 4) To conserve and enhance soil and contribute to the sustainable use of land
- 5) To maintain and enhance the District's cultural heritage assets and their settings
- 6) To reduce contributions to climatic change
- 7) Reduce and control pollution
- 8) To reduce the risk of flooding
- 9) To promote and encourage the use of sustainable methods of travel
- 10) To ensure accessibility to services
- 11) To improve the population's health and promote social inclusion
- 12) To provide appropriate housing and accommodation to meet existing and future needs
- 13) To promote the efficient use of resources, including land and ensure the necessary infrastructure to support sustainable development
- 14) To improve the education and skills of the population
- 15) To ensure sustainable employment provision and economic growth

9.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policies under consideration, and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously, and explained within the text (with the aim to strike a balance between comprehensiveness and conciseness/ accessibility). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is nonetheless possible and helpful to comment on merits (or otherwise) of the Plan in more general terms.

9.4 Finally, it is important to note that effects are predicted taking account of the effect characteristics and 'significance criteria' presented within Schedules 1 and 2 of the SEA Regulations.⁷² So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the Plan to impact an aspect of the baseline when implemented alongside other plans, programmes and projects. Explicit reference is made within the appraisal as appropriate

⁷² Environmental Assessment of Plans and Programmes Regulations 2004

(given the need to balance the desire of systematic appraisal with a desire to ensure conciseness/ accessibility).

Adding structure to the appraisal

- 9.5 Whilst the aim is essentially to present an appraisal of 'the plan' under each of the SA objectives,⁷³ it is appropriate to also give stand-alone consideration to elements of the Plan. As such, within the appraisal narratives below, sub-headings are used to ensure that stand-alone consideration is given to distinct element of the Plan, before the discussion under a final sub-heading concludes on the Submission Plan as a whole.
- 9.6 Within these narratives, specific policies are referred to only as necessary (i.e. it is not the case that systematic consideration is given to the merits of every plan policy in terms of every sustainability objective).

⁷³ Regulations require simply an appraisal of 'the plan'.

10. Appraisal of the Local Plan

Introduction

- 10.1 As introduced above, the aim of this chapter is to present an appraisal of the Submission Plan under the SA framework. A commentary on the spatial strategy is provided as well as an appraisal of the plan as a whole and finally a commentary on cumulative effects; for each of the 15 SA objectives identified within the SA framework.

SA objective 1: to conserve and enhance biodiversity (habitats, species and ecosystems) within the District

Commentary on the spatial strategy

- 10.2 The overall spatial strategy seeks to deliver the majority of growth within three new Garden Communities (GCs) and the Market Towns of Saffron Walden and Great Dunmow. This is supported by further growth within the Key Villages, and limited growth in Type A Villages. Employment development will also be delivered across two key growth sites at Chesterford Research Park and North Stansted, and supported by smaller market sites in Little Canfield, Saffron Walden, Stansted Mountfitchet and Thaxted. Six Development Opportunity Sites are also identified for the expansion of town centre uses within Great Dunmow, Saffron Walden and Stansted Mountfitchet.
- 10.3 The three proposed new GCs will be developed in rural locations where pockets of woodland and hedgerows support biodiversity. At the proposed Easton Park site there are a number of biodiversity assets that have the potential to be affected by development. Within the site there are woodland habitats in the north and south, which are identified as BAP Priority Habitats and are protected through the Local Plan as 'Important Woodland'. The area of Ancient Woodland in the north of the site (Middlefield Wood) is also designated as a Local Wildlife Site (LWS). The woodland in the south of the site at Canfield Spring is likely to be a supporting habitat for High Wood, Dunmow SSSI - which is located adjacent to the site in the south east. The Topic Paper 'Ecological Sites on and adjacent to New Settlement/ Neighbourhood Proposals (May 2017)⁷⁴ further identifies Little Easton Airfield on site for an isolated patch of grassland which supports scarce Essex flora. There are also significant biodiversity assets in the vicinity of the site, including; Quenden Wood and Easton Wood SSSIs in the north west of the site, and Hatfield Forest SSSI and National Nature Reserve in the south west beyond Takeley Village. The Topic Paper additionally identifies a number of historic lanes adjoin the site (7), and concludes that up to date information on the designated and woodland habitats on site would be required as part of an overall ecological survey accompanying any development proposals.
- 10.4 Given the significant presence of biodiversity assets within and surrounding the site, there is inevitably the potential for significant long term negative effects on biodiversity as a result of development - first and foremost there is the potential for direct loss of habitats, but in the longer term there is also the potential for minor negative effects associated with increased levels of disturbance, noise, light and air pollution. The Local Plan proposes Policy SP6 to guide development at the Easton Park site, which identifies that a Strategic Growth Development Plan Document (DPD) will be produced to include a concept plan for the GC and indication of the urban design and landscape parameters to be incorporated into any future planning application, and will provide the framework for development of more detailed masterplans. The policy requires development to "*enhance wider green infrastructure and networks including maintenance and enhancement of existing watercourses, ponds and lakes*

⁷⁴ Uttlesford District Council (2017) Topic Paper: Ecological Sites on and adjacent to New Settlement/ Neighbourhood Proposals [online] available at: https://www.uttlesford.gov.uk/media/7125/Ecological-Sites-on-and-adjacent-to-New-Settlement-Neighbourhood-Proposals-May-2017/pdf/Wildlife_Sites_Topic_Paper_inc_maps_A4-A3.pdf

within the site” and *“mitigate landscape impact to the north of the site including retention, enhancement and reinforcement of existing pockets of woodland, tree blocks and copses”*. This is alongside a requirement to *“provide a new Country Park”* which is likely to contribute to increased ecological connectivity with the potential for long term positive effects. The Country Park will also help to minimise impacts on Hatfield Forest SSSI by offering an alternative area for recreation. The policy is supported by development management policies in relation to the natural environment and these are explored further under the next heading (appraisal of the Plan as a whole). The site is also likely to fall within the emerging Zone of Influence (Zol) for Hatfield Forest SSSI.

- 10.5 At North Uttlesford GC; there are two LWSs located within/ partially within the development site along the northern and south western borders - these are also identified through the Local Plan as ‘Special Verges’ - and an area of Woodland BAP Priority Habitat in the north east of the site. Waterbodies on site are also considered likely to contribute to biodiversity and ecological connectivity. Further to this, the eastern border of the site lies adjacent to a deer park, Hilderham Wood SSSI, and an area identified through the Local Plan as ‘Important Woodland’. In the wider surroundings there are also two LWSs in close proximity in the east/ south east at Crave Hall Meadow and Burton Wood. As the LWSs on site are roadside verges it is considered likely that these designated areas can be easily retained in development proposals, and the impacts of development at the site are likely to be as a result of increased disturbance, noise, light and air pollution; with the potential for minor long term negative effects. A Phase 1 Ecological Report from July 2016 for the North Uttlesford site identifies that *‘overall the site was of limited value in habitat and botanical terms being dominated by intensive arable land’*, aside from the designated habitats at road side verges and Hildersham Wood SSSI *‘the main habitat interests relate to hedgerow boundaries/ mature boundary trees, occasional wet ditches, ponds and in particular an L-shaped linear block of broad-leaved woodland in the site’s north east corner, close to Hildersham Wood SSSI’*. The Ecological Topic Paper⁷⁵ concludes that up to date information for the roadside verges and woodland on site would be required as part of an overall ecological survey accompanying any proposals at the site. Policy SP7 (North Uttlesford Garden Community) again identifies that a Strategic Growth DPD will be produced to further guide development at the GC, and the policy specifically requires development to *“provide natural, semi-natural and amenity green space”*, and *“enhance wider green infrastructure and networks including maintenance and enhancement of existing watercourses, ponds and lakes within the site”*. The policy also seeks to *“provide soft transition zones around the boundaries of the deer park”*. Again, this allocation is supported by wider development management policies (explored in the next section - appraisal of the Plan as a whole).
- 10.6 At West of Braintree GC, the whole site contains areas of Woodland BAP Priority Habitat. The western end of the site lies within Uttlesford District and this area contains Broxted Wood LWS and lies adjacent to Ancient Woodland at Mouslin Wood which is also designated as a LWS and has valuable habitats surrounding it. As identified through the Ecological Topic Paper⁷⁶ there are further habitats in the vicinity of the site including at Whitehouse Spring, Stebbing Green, Flich Way and the Stebbing – Whitehouse Road lane. A Preliminary Ecological Assessment (2015)⁷⁷ identifies that *‘the majority of the site is considered to be of low ecological value due to the dominance of intensively farmed arable crops and isolated, heavy shaded linear woodland blocks (spinneys) lacking structural diversity’*, and that *‘opportunities to enhance these relatively extensive uniform landscape features within the context of the proposed development are available’*. Further to this, the assessment identifies that *‘habitats of higher ecological value including field margins, hedgerows, woodland and waterbodies are present throughout the site and these habitats have a greater potential to support rare and protected species’*. The Topic Paper concludes that up to date information on the sites will be required as part of an overall ecological survey accompanying any development proposal. Development across the site will need to retain the pockets of woodland to avoid the negative effects associated with direct habitat loss; however, in the long term development surrounding designated habitats is likely to lead to minor negative effects as a result of increased disturbance, noise, light and air pollution. Policy SP8 (West of

⁷⁵ Ibid.

⁷⁶ Ibid.

⁷⁷ Ibid.

- Braintree Garden Community) again identifies that a Strategic Growth DPD will be produced to further guide development at the GC, and the policy specifically requires development to *“provide natural, semi-natural and amenity green space”* as well as allotments and open space, and to *“incorporate measures to protect and enhance the Ancient Woodland and Local Wildlife Site of Broxted Wood and its setting.”*
- 10.7 Policy SP5 (Garden Community Principles) also identifies overall principles for development at the GCs which includes the requirement for development *“that enhances the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains”* - providing a strong policy position to support the delivery of positive effects for biodiversity at the GCs.
- 10.8 At the Market Town of Saffron Walden the proposed allocations that do not yet have planning permission (SAF1 to SAF7) do not contain any designated biodiversity and are not known to contain any Priority Habitats. Combined with the sites allocated in the plan that have planning permission (SAF8 & SAF9) the majority of growth will occur in the south east of the settlement and away from the surrounding habitats and LWSs (which are largely concentrated north east, and west of the settlement area). Therefore the proposed development in Saffron Walden is not considered likely to lead to any significant effects for biodiversity.
- 10.9 High Wood SSSI is located just west of Great Dunmow, and two allocations within the plan (GtDUN1 and GtDUN4) are located adjacent/ in very close proximity to the designated site. Development at these sites are considered likely to lead to long term minor negative effects as a result of increased disturbance, noise, light and air pollution. Policy GtDUN4 identifies that *“development proposals will need to demonstrate that they will have no adverse impact on the High Wood SSSI located adjacent to the site”* and it is recommended that similar provisions are added to Policy GtDUN1 where the development of 400 dwellings and a new secondary school are considered likely to lead to impacts in terms of disturbance and reduced air quality along Stortford Road.
- 10.10 Within the Key Villages the proposed development site at Newport is located within the SSSI Impact Risk Zone associated with Debden Water SSSI where residential development of 50 or more houses outside the existing settlement (or 100 houses or more when within the settlement) will require further consultation with Natural England to mitigate any potential negative effects arising for biodiversity. The proposed development site at Takeley Street is located adjacent to Hatfield Forest SSSI and is considered likely to lead to long term negative effects as a result of increased disturbance, noise, light and air pollution. The site, being adjacent to the SSSI will fall within the emerging Zol for Hatfield Forest SSSI where it is recommended that development contributes to the delivery of mitigation measures to address the likely impacts of recreational disturbance and decreased air quality at Hatfield Forest. There are no significant biodiversity constraints associated with the proposed development sites at Elsenham, Stansted Mountfitchet and Thaxted (given a lack of designated biodiversity sites or Priority Habitats within or surrounding the sites).
- 10.11 Within the smaller villages (Type A Villages Debden, Felsted, Great Easton and Quendon and Rickling) the proposed development sites that do not have planning permission are not considered likely to lead to any significant effects on biodiversity given a lack of designated sites or Priority Habitats within or surrounding the sites.
- 10.12 In regards to the employment allocations; Chesterford Research Park is located within a parkland setting containing (and surrounded by) Ancient Woodland and woodland BAP Priority Habitats. The site allocated for further development largely avoids any loss of habitats, but the expansion of the site is considered likely to lead to long term minor negative effects for biodiversity as a result of increased disturbance, noise, light and air pollution. The North Stansted site contains BAP Priority Habitats and is located adjacent to a Local Wildlife Site. Development can reduce the potential for negative effects by avoiding habitat loss; however, overall it is likely to lead to minor long term negative effects as a result of increased disturbance, noise, light and air pollution. Development at the North Stansted site may also fall within the emerging Zol for Hatfield Forest. These large strategic employment allocations are supported by smaller market choice sites at Saffron Walden, Stansted Mountfitchet, Thaxted and Little Canfield. The small site within Little Canfield is located in close proximity

to High Wood SSSI and development has the potential for minor negative effects - particularly as a result of more traffic on the A120 which runs adjacent to the SSSI. The remaining small sites at Saffron Walden, Stansted Mountfitchet and Thaxted are not considered likely to lead to any significant effects on biodiversity given the lack of designated sites or Priority Habitats within or surrounding the sites.

- 10.13 In regards to the Development Opportunity Sites, these are located within the town centres of Great Dunmow, Saffron Walden and Stansted Mountfitchet and are not considered likely to lead to any significant effects on biodiversity given the lack of designated biodiversity sites and Priority Habitats in these areas.

Appraisal of the Plan as a whole

- 10.14 Whilst the spatial strategy avoids development in locations likely to significantly impact upon biodiversity; pockets of woodland and priority habitats are located throughout the plan area, and many of these are nationally designated SSSIs or locally designated LWSs. The plan includes Policies EN7 (Protecting and enhancing the natural environment) and EN9 (Ancient woodland and protected trees) that support the retention and enhancement of biodiversity in the Plan area. Policy EN7 requires an ecological survey alongside any development that has the potential to affect internationally, nationally or locally designated sites, or protected species and their habitats, and identifies that *“the design of development should incorporate measures to improve the biodiversity or geodiversity value of the development site”* and that these measures should *“include making a contribution to the network of biodiversity sites”* and *“should also attempt to link wildlife habitats together, improving access to, between and across them”*.
- 10.15 Policy EN9 provides further protection for woodland which, as a dominant asset within the Plan area, is likely to be affected cumulatively as a result of the allocations. The Policy identifies that the need for development or benefits of development will need to clearly outweigh the loss of any important trees to be permitted, and any development proposals affecting Ancient Woodland or veteran trees will be expected to mitigate any adverse effects. Further to this Policy EN18 seeks to reduce the impact of light pollution, including a criterion for all development proposals for external lighting to ensure that *“there is no harm to local ecology [or] intrinsically dark landscapes”*. This will minimise the impacts of proposed development in terms of disturbance to species.
- 10.16 The HRA that accompanies the Local Plan identifies that the Plan is not likely to result in significant impacts on European sites (including following consideration of the Focused Changes). It recommends that recreational pressures on Epping Forest SAC are kept under advisement through the HMA-wide commitment set out in the Epping Forest SAC Memorandum of Understanding; and that the Local Plan includes a policy demonstrating Uttlesford’s commitment to the multi-authority HMA working to address air quality issues on Epping Forest SAC as a safeguard.
- 10.17 Overall, the Local Plan is seeking to meet identified housing, employment and infrastructure needs and this will result in the loss and fragmentation of habitats as well as increased disturbance (noise, light and recreation) where this development is located. To minimise the impacts of development (including those identified as a result of the spatial strategy) the Local Plan includes policies that seek the protection of key habitats and ecological features, as well as enhancements where possible. This includes the provision of new habitats, improvements to ecological connectivity, and by seeking biodiversity net gain through the delivery of the GCs. However, the potential for positive effects is uncertain at this stage. The Local Plan includes allocations that are likely to fall within the emerging Zol for and/ or increase atmospheric pollution at Hatfield Forest SSSI. In line with advice from Natural England, it is recommended that the Local Plan includes a requirement for all development located within the emerging Zol to provide contributions towards the delivery of mitigation measures to address the likely impacts of recreational disturbance and decreased air quality at Hatfield Forest.

- 10.18 On balance, while there is the potential for both positive and negative effects, the overall level of growth is considered likely to have a residual minor long term negative effect on biodiversity.

Commentary on cumulative effects

- 10.19 Within the plan itself (intra-plan), cumulatively the delivery of growth is likely to impact upon Hatfield Forest SSSI located south of the District. Natural England are developing a Zol around Hatfield Forest to manage the cumulative effects of growth on the SSSI in terms of recreational disturbance and decreased air quality, and it is recommended that this is supported through the Local Plan policy framework. Potential cumulative (or in combination) effects on Epping Forest SAC and other European sites were considered through the HRA process for the Local Plan. It should also be noted that there is a signed MoU⁷⁸ committing parties to managing the impacts of growth within the HMA on Epping Forest SAC.
- 10.20 Development proposed in the Local Plan has the potential to have cumulative effects with growth proposed in other authorities within and outside the HMA. This includes the proposed joint West of Braintree GC with Braintree District Council. Potential cumulative (or in combination) effects on Epping Forest SAC and other European sites were considered through the HRA process for the Local Plan. All of the Local Plans include policies which seek to protect and enhance biodiversity. The authorities are also working closely to minimise cumulative impacts on important biodiversity. An example of this is the signed MoU⁷⁹ committing parties to managing the impacts of growth within the HMA on Epping Forest SAC. It will be important for Local Planning Authorities to work closely to identify potential cross-boundary issues and seek to protect and enhance ecological corridors that cross authority boundaries where possible. They should also explore strategic opportunities to delivery biodiversity net gain.

SA objective 2: to conserve and enhance water quality and resources and help achieve the objectives of the Water Framework Directive

Commentary on the spatial strategy

- 10.21 In terms of water quality, none of the rivers in the Roding, Beam and Ingreborne catchment currently achieve good or better ecological or biological status/potential. A total of 67% are classified as having poor biological status, and 11% of the assessed river water bodies have bad status. In the Upper Lee catchment, 16% of rivers currently achieve good or better ecological status/potential and 10% have good or high biological status, with 62% at poor biological status, but none classed as bad status. The Cam and Ely Ouse and Combined Essex catchments achieve higher percentages of water bodies with at least good biological status at over 27% and 33% respectively but Combined Essex catchment reported only 7% of water bodies achieving good ecological status/potential.⁸⁰
- 10.22 Whilst the spatial strategy will have implications for rivers running through the Plan area, it is considered that mitigation available at the development management level could significantly reduce the potential for negative effects, and enhance the potential for development to deliver positive effects in terms of ecological quality enhancements in this area. It will also be important for development to provide sustainable drainage systems to ensure that groundwater and/ or surface water quality supports or enhances the ecological and chemical quality of the rivers. This will also be appropriate for the northern half of the District, which lies within a Groundwater Source Protection Zone where development will need to ensure that it does not deteriorate the quality of groundwater resources.

⁷⁸ West Essex/ East Hertfordshire HMA authorities, ECC, Hertfordshire CC, City of London Corporation and Natural England

⁷⁹ West Essex/ East Hertfordshire HMA authorities, ECC, Hertfordshire CC, City of London Corporation and Natural England

⁸⁰ River Basin Management Plan Anglian River Basin District, December [2009] & River Basin Management Plan Thames River Basin District, December [2009]

- 10.23 While the EA have expressed concerns in relation to the Easton Park GC and potential options for addressing wastewater and sewerage infrastructure, the Water Cycle Study (2018) considered this issue and indicated that development can be accommodated albeit subject to a detailed WCS for the Thames Area of the district. .
- 10.24 In terms of water resources, the Water Cycle Study (2018)⁸¹ identifies that Uttlesford District is partly underlain by a chalk aquifer of regional importance and the Environment Agency currently class the surface water and groundwater resources within the district as over-licensed or over-abstracted, meaning there that there is no additional water available for supply. The District falls within Affinity Water's supply area. Water companies in England are legally required to supply water to private consumers and businesses within their area. As set out in the Water Industry Act 1991, they must prepare and maintain a Water Resources Management Plan (WRMP) that sets out how the company intends to maintain the balance between water supply and demand. Water companies are currently in the process of updating their WRMPs to take account of predicted growth and ensure that there are schemes in place to meet future demands.⁸² The scale of growth proposed through the Local Plan will inevitably increase pressures on water resources, however; given the legal requirements in place for WRMPs, it is considered unlikely that there be any significant effects and the phasing of development and close consultation with water companies will support the timely provision of the necessary infrastructure. In line with the Water Cycle Study recommendations, Local Plan policies should encourage the conservation of water in new dwellings and commercial properties to minimise negative effects on water resources. It is also expected that development at any of the allocations can deliver mitigation (for example rainwater harvesting measures) to support reduced water use per person per day.
- 10.25 The Water Cycle Study also assessed the impacts of the development proposed through the Local Plan on wastewater treatment and sewage infrastructure and found that, overall, within the Towns and Key Villages there are limited constraints associated with the allocated development, with the Water Recycling Centres (WRCs) having the capacity to accommodate increased flows, with future investment and planning by the operating sewerage company. The Study also found that within the Garden Communities there were no 'show-stoppers' that would prevent a timely delivery of at least one suitable technically feasible option to discharge to existing WRCs for each Garden Community. Furthermore, given the scale of growth under each of the options, there would be the potential to provide a new, separate on-site WRC to serve each community; however, in line with current legislation and policies, new discharges should be connected to existing infrastructure where it is reasonable to do so. Anglian Water and Thames Water companies who collect and treat waste water in the district, identify through representations that the phasing of development should ensure that the necessary infrastructure updates to WRCs are completed prior to occupation of the sites. Policy SP5 (Garden Community Principles) identifies that 'the phasing of all forms of infrastructure will meet the needs of the new community as they arise and will not exacerbate existing problems'.
- 10.26 Overall, given the lack of significant constraints available options to address infrastructure needs a residual neutral effect is considered likely.

Appraisal of the Plan as a whole

- 10.27 Local Plan Policies EN10 - EN12 seek to protect the water environment in the plan area. Policy EN11 (Surface water flooding) identifies that "*all new development will incorporate Sustainable Drainage Systems (SuDS)*" and that "*such systems will be expected to provide optimum water run-off rates and volumes*". In line with the Water Cycle Study recommendations, Policy EN12 supports development "*where it is designed to minimise consumption of water, protect and enhance water quality and protect water resources*". The policy specifically seeks "*a water efficiency target of 110 litres per person per day*" in residential development, as well as "*adequate and appropriate provision for water recycling*". The policy further identifies that it will only permit development "*where it will not cause*

⁸¹ Arcadis Design and Consultancy prepared for Uttlesford District Council (2018) Water Cycle Study Detailed Update [online] available at: <https://www.uttlesford.gov.uk/article/4942/Infrastructure> [accessed 30/11/18]

⁸² Affinity Water (2014) Water Resource Management Plan.

contamination of groundwater [or surface water], particularly in the protection zones". Policy INF1 requires that development is supported by the timely delivery of infrastructure to meet the needs arising.

- 10.28 The WCS suggests that while there are constraints, there is the potential to meet increased demands as a result of proposed development in the Local Plan both in terms of water resources and wastewater treatment and sewage. It also found that the proposed development will not lead to a deterioration of WFD status or unduly compromise the achievement of WFD good status. Given the findings of the WCS it is predicted that the Local Plan will have a residual neutral effect on this SA objective.

Commentary on cumulative effects

- 10.29 There is the potential for development proposed through the Local Plan to interact with development proposed in other plans and programmes to have both a negative and positive cumulative effect on the water environment. Water resources and wastewater treatment capacity are generally managed at a catchment level and there is close working between the Environment Agency, water companies and wastewater service providers to monitor the situation and plan ahead for new infrastructure to meet predicted demands. Given the findings of the WCS, it is considered that the Local Plan will not have a significant negative cumulative effect on this SA objective.

SA objective 3: to conserve and enhance the District's landscape character and townscapes

Commentary on the spatial strategy

- 10.30 The overall spatial strategy seeks to deliver the majority of growth within three new Garden Communities (GCs) and the Market Towns of Saffron Walden and Great Dunmow. This is supported by further growth within the Key Villages, and limited growth in Type A Villages. Employment development will also be delivered across two key growth sites at Chesterford Research Park and North Stansted, and supported by smaller market sites in Little Canfield, Saffron Walden, Stansted Mountfitchet and Thaxted. Six Development Opportunity Sites are also identified for the expansion of town centre uses within Great Dunmow, Saffron Walden and Stansted Mountfitchet.
- 10.31 With regards to the GCs, Landscape and Visual Appraisals for each of the proposed GCs were completed in 2017 by Chris Blandford Associates. Overall these appraisals have identified that the sites are located in areas of high (at North Uttlesford GC) or moderate to high (at Easton Park and West of Braintree GCs) landscape and visual sensitivity and each option contains areas that are particularly sensitive to development. At Easton Park the northern part of the site is the most sensitive in terms of landscape and visual sensitivity, and this coincides with a strong heritage setting at Easton Lodge. Policy SP6 does requires the delivery of a Country Park, which has the potential to become a valued landscape if effectively implemented with the potential for long term positive effects.
- 10.32 At North Uttlesford the upper valley sides and ridgeline are identified as the most sensitive areas to development, but the appraisal states that good design can support mitigation of negative effects on the landscape. At West of Braintree the easternmost part of the site is considered to be the area most sensitive in terms of landscape and visual sensitivity, and this area falls outside of Uttlesford District. Evidence indicates that careful planning and the sensitive design and location of development within the sites can reduce the potential for negative effects and careful and appropriate mitigation of these impacts will be required.
- 10.33 Ultimately, the delivery of at the GCs in rural locations will permanently change the rural character of these areas with a significant negative effect on the landscape through the introduction of large scale development in previously undeveloped areas. However, it is important to note that the delivery of the GCs helps to direct growth away from the historic settlements in the district. Without the GCs it is likely that there would be increased growth at these settlements and this could have significant negative effects on their historic townscape.

- 10.34 The GC policies (SP5 to SP8) identify that a Strategic Growth Development Plan Document (DPD) will be produced and will set out the nature and form of the new community to include a concept plan and indication of the urban design and landscape parameters to be incorporated into any planning application; providing the framework for more detailed masterplanning. The DPDs will identify site specific mitigation measures that will address the potential negative effects on the landscape.
- 10.35 Housing development across the rest of the existing settlements, and the proposed employment land allocations avoid the most sensitive landscapes within the district. Whilst development within the Market Towns and Villages has the potential to affect townscapes, the effects can be both positive and negative and are ultimately dependent upon the delivery of high quality, responsive design that compliments the townscape character. Some of the sites are include previously developed land where redevelopment is likely to support improvements to the townscape with the potential for long term minor positive effects. The spatial strategy has sought to minimise development within the smaller settlements, which will support the retention of village identities and the rural qualities/ characteristics of many of these settlements.

Appraisal of the Plan as a whole

- 10.36 Whilst the spatial strategy avoids development in locations likely to significantly impact upon key protected landscapes, the scale of development across the district, including at the GCs is likely to impact upon the rural character of the district to some degree. To address this, the Local Plan includes Policy C1 which seeks to protect landscape character. The policy provides protection for; cross-valley views in the river valleys and panoramic views of the plateaux and uplands. It also importantly protects historic settlement patterns and landscape patterns. Policy EN18 seeks to minimise the impact of external lighting on “*intrinsically dark landscapes*” and the wider landscape which will support the retention of the rural character of the area and overall tranquillity.
- 10.37 The Local Plan seeks to protect the countryside by defining ‘Development Limits’ around existing settlements (Policy SP9) and directing the majority of development to within these settlement limits. Policy SP10 (Protection of the Countryside) identifies that development within the countryside will only be permitted for agricultural, horticultural, forestry and outdoor recreation uses or other uses which require a countryside location.
- 10.38 Policy D1 (High Quality Design) will also support the delivery of high quality design in development that will contribute to mitigating the potential negative effects arising as a result of the implementation of the Local Plan and its spatial strategy. In this respect, Policy D1 identifies that “*all new development in Uttlesford should contribute to the creation of high quality places through a design-led approach underpinned by good design principles and reflecting a thorough site appraisal*” and demonstrate how the development will “*respond to the landscape, local and longer-views and the natural and historic environments.*”
- 10.39 Development proposed through the Local Plan is likely to have a negative effect on the landscape, in particular the rural character in the areas where the GCs are proposed. Local Plan policies seek to ensure that development retains and enhances the key landscape areas, and the overall landscape character and rural setting, to reduce the extent and significance of the inevitable effects as a result of growth to meet identified needs. On balance, it is predicted that the Local Plan has the potential for a significant residual negative effect on the landscape. This is primarily as a result of the delivery of three new GCs that will permanently alter the rural character of those areas. However, it is recognised that this strategy also helps to minimise impacts on the landscape/ townscape around the existing towns and villages within the district. It is also recognised that only a proportion of the GCs will be delivered during the plan period and as a result mitigation may not be fully implemented or established until the GCs are fully built out.

Commentary on cumulative effects

- 10.40 Development proposed through the Local Plan has the potential to interact with development proposed through other plans to have a cumulative effect on the landscape. This is most

likely to arise through the incremental loss of greenfield sites on the edge of existing settlements as well as the delivery of large-scale development such as new settlements. Ultimately the nature and significance of effects will be dependent on the design/ layout or development and the implementation of mitigation measures. It will be important for Local Planning Authorities to work closely with each other as well as Natural England to try and plan at a landscape scale, minimise potential impacts as well as identify opportunities to deliver improvements where possible, including the delivery of new valued landscapes.

SA objective 4: to conserve and enhance soil and contribute to the sustainable use of land

Commentary on the spatial strategy

- 10.41 The overall spatial strategy seeks to deliver the majority of growth within three new Garden Communities (GCs) and the Market Towns of Saffron Walden and Great Dunmow. This is supported by further growth within the Key Villages, and limited growth in Type A Villages. Employment development will also be delivered across two key growth sites at Chesterford Research Park and North Stansted, and supported by smaller market sites in Little Canfield, Saffron Walden, Stansted Mountfitchet and Thaxted. Six Development Opportunity Sites are also identified for the expansion of town centre uses within Great Dunmow, Saffron Walden and Stansted Mountfitchet.
- 10.42 Development at the proposed GCs will inevitably result in the significant loss of greenfield land and Grade 2 Best and Most Versatile (BMV) agricultural land; with the potential for significant permanent negative effects on soil resources.
- 10.43 The majority of the land in the district outside of the settlements is Grade 2 BMV agricultural land, and, as such, a large proportion of the allocations are likely to lead to further incremental loss of this soil resource with the potential for permanent negative effects. Brownfield sites within the settlements have been identified where available and feasible/ suitable; however, given the predominantly rural nature of the district, these inevitably do not make a significant contribution in helping to meet identified needs.

Appraisal of the Plan as a whole

- 10.44 Whilst the spatial strategy will inevitably lead to significant negative effects on soil resources as a result of the permanent loss of high quality agricultural land, the Local Plan seeks to minimise any further effects on agricultural land resources. In particular, Policy SP9 (Development within development limits) will restrict the development of the countryside, and Policy SP10 (Protection of the countryside) seeks to protect the countryside for “*its value as productive agricultural land*” requiring development within the countryside to “*protect the best and most versatile agricultural land*”. Policy C3 permits the change of use of agricultural land to domestic garden; however, this is not considered likely to lead to any significant effects.

Commentary on cumulative effects

- 10.45 Development proposed through the Local Plan has the potential to interact with development proposed through other plans to have a cumulative effect on this SA objective. This is most likely to arise through the incremental loss of agricultural land on the edge of existing settlements as well as the delivery of large-scale development such as new settlements. While Local Planning Authorities can try and direct development to areas of lower agricultural land quality, this is not always possible. Given the nature of the district, it will still retain an overall high level of high quality agricultural land resources.

SA objective 5: to maintain and enhance the District's cultural heritage assets and their settings

Commentary on the spatial strategy

- 10.46 The overall spatial strategy seeks to deliver the majority of growth within three new Garden Communities (GCs) and the Market Towns of Saffron Walden and Great Dunmow. This is supported by further growth within the Key Villages, and limited growth in Type A Villages. Employment development will also be delivered across two key growth sites at Chesterford Research Park and North Stansted, and supported by smaller market sites in Little Canfield, Saffron Walden, Stansted Mountfitchet and Thaxted. Six Development Opportunity Sites are also identified for the expansion of town centre uses within Great Dunmow, Saffron Walden and Stansted Mountfitchet.
- 10.47 In terms of the Easton Park GC, there are a number of heritage constraints, in particular, Easton Lodge Registered Park and Garden in the north east of the site. The site also contains 3 Listed Buildings, 3 non-designated assets (World War II Airfield, Brookend Farmhouse and Strood Hall) and 12 Sites of Special Archaeological Interest. Additionally, the allocated area is located adjacent to/ partially within the recently designated Little Easton Conservation Area. Given the assets, both designated and non-designated on site, it is recognised that development has the potential for significant long term negative effects, primarily through the introduction of development in a previously undeveloped area; ultimately changing the landscape and overall character of this area. It is also recognised that development has the potential for minor positive effects as a result of increased access to and awareness of the historic environment. The site allocation Policy SP6 (Easton Park Garden Community) seeks to address the constraints of the site and includes requirements to; *"incorporate measures to substantially conserve and enhance the Gardens of Easton Lodge"*, *"respond positively to the landscape character and significance of the historic environment including designated and non-designated heritage assets"*, *"be informed by appropriate landscape/ visual and heritage impact assessments, the latter to include the results of archaeological field evaluation"*, and *"conserve, and where appropriate enhance the significance of heritage assets and their settings, both within the site and the wider area"*. The policy further identifies mitigation measures for consideration, including; tree screening, buffer zones (for example in areas where tree planting is not extensive), archaeological investigation, beneficial re-use and management of heritage assets, and maintaining key views to the Parish Church Tower in connection with Little Easton Conservation Area.
- 10.48 There are also significant heritage constraints associated with the North Uttlesford GC, which contains a Scheduled Monument - a Romano-Celtic temple 400m south of Dell's Farm. The nationally important archaeological site has not been fully explored or excavated, but is known to be connected to the adjacent historic settlement of Great Chesterford and further Roman and Anglo Saxon archaeological sites there. The site allocation also surrounds Park Farm and its Listed Building; where development has the potential to affect its setting. Though not adjacent to the GC, the settlement of Great Chesterford, and the Great Chesterford Conservation Area is located in close proximity to the site, and the overall addition of 5,000 homes in the wider landscape is considered likely to significantly impact upon the setting of the historic settlement. Policy SP7 (North Uttlesford Garden Community) seeks to address the identified constraints, with requirements for development at the GC to; *"positively respond to the landscape and historic value of this location with proposals accompanied and influenced by landscape/ visual and heritage impacts assessments"*, and *"conserve and where appropriate enhance the significance of heritage assets and their settings both within the site and the wider area"*. The policy further identifies mitigation measures for consideration, including; consideration of density, scale, form, materials, and existing boundaries; appropriate buffer zones that work with the topography and geology of the site; screening; protection of the Scheduled Monument and its setting; retaining visual and historic association between the Roman Temple and the Roman Town; archaeological investigation; and, as far as possible, retaining the character of existing historic routes through the site, narrow lanes and mature tree lines. However, it should be noted that Historic England object

to the allocation of this site for its potential impacts on the historic environment and the historic settlement of Great Chesterford.

- 10.49 At the West of Braintree GC the full extent of the site includes Listed Buildings, a non-registered park and garden (Blake House Farm - small arboretum) and two non-designated assets (Old Hall moat and fishponds, and Airfield buildings and firing range - the Butts). Further to this there are a large number of heritage assets surrounding the site, including: Great Saling Conservation Area, Saling Hall and Saling Grove Registered Parks and Gardens, and further listed buildings and non-registered assets. The overall delivery of around 10,500 dwellings at the site is considered to significantly impact upon the historic character of the area and the predominantly rural setting. Similarly to Policy SP7, the site allocation Policy SP8 (West of Braintree Garden Community) seeks to address the identified constraints, with requirements to “*respond positively to the landscape character and significance of the historic environment, including designated and non-designated heritage assets*”, “*reflect the rural character to avoid harm to heritage assets and their settings on site and adjacent to the site*”, and “*be informed by appropriate landscape/ visual and heritage impact assessments*”. The policy identifies mitigation measures for consideration, including; consideration of density, scale, form, materials, and existing boundaries, appropriate buffer zones/ transition zones/ areas of open land that work with the topography and geology of the site; tree screening, and design to take account of further research into non-designated heritage assets and archaeology within the site.
- 10.50 The spatial strategy focuses substantial development at the GCs and this will help to protect the historic settlements within the district for which a number already have a significant level of committed development. Despite this, the proposed allocations at the Market Towns of Saffron Walden and Great Dunmow have the potential to both negatively and positively affect the historic environment. Within Saffron Walden there are two Conservation Areas, and additionally two Registered Parks and Gardens (Audley End and Bridge End Gardens) lie adjacent to the settlement in the west. The majority of the site allocations within Saffron Walden are limited in scale and located to the east/ south east of the settlement and avoid the designated heritage assets and are considered unlikely to significantly affect their setting. As such, these sites are considered unlikely to lead to any significant effects. However, it should be noted that site allocation SAF3 is located within Saffron Walden Conservation Area 1 and adjacent to Bridge End Gardens Registered Park and Gardens, and site allocation SAF7 is located just north east of Bridge End Gardens Registered Park and Garden also. These two sites will develop the areas north and south of Bridge End Gardens with the potential for cumulative negative effects on its setting. Additionally, site allocation SAF4 is located just outside of Saffron Walden Conservation Area 1. Any proposal for these sites should take any Conservation Area Appraisals into account and be sensitively designed.
- 10.51 At Great Dunmow, the allocated sites GtDUN1 and GtDUN4 are located adjacent to the Listed Building at Highwood Farm and GtDUN1 is also located adjacent to more Listed Buildings at Folly Farm. Site allocation GtDUN2 is located adjacent to Great Dunmow Conservation Area in the east (along with its Listed Buildings contained within), and adjacent to a Listed Building at Newton Hall in the west. The development of these sites will require suitable mitigation to avoid/ reduce the potential for long term negative effects. Whilst site allocation GtDUN6 is located adjacent to Listed Buildings and within Great Dunmow Conservation Area it proposes the redevelopment of a brownfield garage site which is considered likely to improve the townscape with the potential for minor long term positive effects.
- 10.52 Within the Key Villages and Type A Villages, as well as the smaller market choice employment sites at Little Canfield, Saffron Walden, Stansted Mountfitchet and Thaxted; the proposed allocation sites are generally small extensions adjoining the settlement, most of which have the potential to affect the settings of Listed Buildings and/ or Conservation Areas. The development of these sites will require appropriate mitigation to avoid/ reduce the potential for long term minor negative effects. However, given their scale they are unlikely to have significant negative effects.
- 10.53 Two large scale employment allocations are proposed at Chesterford Research Park and North Stansted. Chesterford Research Park does not contain and is not immediately surrounded by any designated heritage assets. Whilst development has the potential to affect

the wider rural setting; there are significant areas of woodland surrounding the site that are likely to provide screening and therefore development is not considered likely to lead to any significant effects on the historic environment. However, it is recognised that an increase in traffic on local roads as a result of the development may affect the heritage settings of Little Walden, Little Chesterford and Great Chesterford (which contains a designated Conservation Area); with the potential for minor long term negative effects.

- 10.54 The North Stansted site (in Options 1 and 3) is not known to contain any designated heritage assets; however, it is located adjacent to two Grade II Listed Buildings in the south west of the site, and a number of Grade II Listed Buildings located along Bury Lodge Lane, north east of the site. Therefore, development at the site is likely to affect the setting of designated heritage assets, with the potential for both positive and negative effects; which are ultimately dependent on aspects such as high quality design and layout. It is also a consideration that the site is partially previously developed land and development has the potential to improve the public realm in this area.
- 10.55 Overall, the site allocation policies for housing and employment sites within the Strategic Employment Allocations, Market Towns, Key Villages and Type A Villages are less detailed and substantive in terms of requirements for development than those provided for the GCs, and the wider Local Plan policies (explored under the next heading - appraisal of the plan as a whole) are intrinsically linked to ensuring that these sites manage the potential negative effects arising.
- 10.56 The proposed Development Opportunity Sites are town centres sites and will generally affect the townscape setting of the relevant Conservation Areas and Listed Buildings; however, the proposals are for town centres uses that should complement the range of uses and attraction of these areas, to support town centre vitality and viability with the potential for long term minor positive effects. High quality design that is in keeping with heritage settings will be crucial to maximising the potential positive effects, and in this respect the wider Local Policies (explored under the next heading - appraisal of the plan as a whole) play a key role in successful delivery and facilitation of this growth.

Appraisal of the Plan as a whole

- 10.57 Alongside the spatial strategy, the Local Plan proposes a number of policies that support and guide development to minimise the impact of the spatial strategy on the historic environment, and maximise opportunities for enhancements, particularly in terms of accessibility.
- 10.58 Policies EN1 to EN6 provide protections for the historic environment including Conservation Areas, Listed Buildings, Scheduled Monuments and sites of archaeological importance, Historic Parks and Gardens and non-designated assets of local importance. These policies will be key to addressing the potential impacts arising as a result of the spatial strategy, particularly within the employment allocations and housing allocations across the Strategic Employment Sites, Market Towns, Key Villages and Type A Villages, where the site allocation policies are less detailed and substantive than those provided for development at the GCs.
- 10.59 Policy EN1 (Protecting the Historic Environment) identifies that “*development will be supported where it preserves or enhances the significance of the historic environment*”, and that applicants will be required to “*describe the significance of any heritage assets affected, including any contribution made by their settings*” drawing upon historic environment records and supported by appropriate archaeological assessment where necessary. Policy EN2 sets criteria for the design of development within Conservation Areas, including; “*no detrimental visual impact and no substantial pollution of any type*”, no damage to “*key views in, out or within the Conservation Area*”, “*no loss of character or historic significance*”, and a “*positive contribution to local character and distinctiveness*”. Policy EN4 recognises that “*development affecting a Listed Building should be in keeping with its scale, form, character, materials and surroundings*”, and Policy EN5 (Scheduled Monuments and Sites of Archaeological Importance) identifies that “*where nationally important archaeological assets, whether scheduled or not, and their settings, are affected by proposed development there will be a presumption in favour of their physical preservation in situ for example through modification of design, layout, drainage, landscaping or the siting and location of foundations*”. Further to

this, Policy EN5 (duplicated policy number) (Historic Parks and Gardens) requires development to sustain and enhance the significance of Historic Parks and Gardens, and Policy EN6 seeks to ensure the retention, enhancement, and viable use of heritage asset of local interest.

- 10.60 Policies EN7, EN8, EN9, and C1 all seek to protect the natural environment, open spaces, woodland and trees, landscape character and the countryside which support the wider historic environment and heritage settings; with the potential for indirect long term positive effects.
- 10.61 Overall, whilst development proposed through the Local Plan will inevitably significantly change the landscape and townscapes of areas within the district, the Local Plan policies seek to ensure that development retains and enhances the significance of the historic environment and heritage assets and their settings (including designated and non-designated sites). Protection is also provided to ensure that development appropriately considers archaeology as a prominent historic asset within the district. The policies are likely to reduce the extent of the negative effects identified, however the overall impact remains uncertain at this stage as it is ultimately dependent on successful design, layout and integration. On balance, it is likely that development will lead to at least a residual minor negative effect given the scale of growth proposed within a rural historic setting. However, this is considered alongside the merits of delivering the GCs away from the main historic settlement areas which would otherwise be subject to significantly higher levels of growth. It is also recognised that only a proportion of the GCs will be delivered during the plan period and as a result mitigation may not be fully implemented or established until the GCs are fully built out.

Commentary on cumulative effects

- 10.62 There is the potential for a significant cumulative loss of greenfield land as a result of the distribution of housing to meet the Objectively Assessed Need (OAN) across the West Essex/ East Hertfordshire Housing Market Area (HMA) and this may cumulatively affect the wider historic environment setting.

SA objective 6: to reduce contributions to climatic change

Commentary on the spatial strategy

- 10.63 The Renewable Energy Study⁸³ identifies that a high proportion of the households in Uttlesford could employ solar water heating systems, active and passive solar space heating and solar photovoltaics (PV). In larger schemes, large active solar systems can be combined with community heating schemes to support renewable energy and increased energy efficiency. Further to this, the Study identifies potential for community wind energy projects particularly within rural communities, and scope for ground-coupled energy which is identified for the ability to compete economically in rural locations where the only conventional form of heating available is that fuelled by oil or electric storage heaters. There is good scope for development (both housing and employment) to include such measures to support renewable energy generation. The delivery of three new GCs provides supports this objective as they provide a scale of development which is more likely to incorporate renewable/ low carbon energy compared to smaller scale development.
- 10.64 The implementation of the spatial strategy proposed through the Local Plan will ultimately increase pressures on existing highways infrastructure and affect per capita emissions, and the Local Plan seeks to maximise opportunities to facilitate this growth in sustainable locations, which are supported by infrastructure and sustainable transport choices, and which reduce the need to travel.
- 10.65 The proposed GCs are expected under Policy SP5 (Garden Community Principles) to “*demonstrate high levels of self-containment*”, with “*integrated and accessible transport*”

⁸³ Altechnica (2008) Renewable Energy Study of the District [online] available at: <https://www.uttlesford.gov.uk/article/4937/Environment>

systems, with walking, cycling and public transport designed to be the most attractive forms of local transport". The policy specifically seeks to ensure that "opportunities for smarter and sustainable travel will be maximised, with links to neighbouring settlements provided that reduce the reliance on the private car" and that "the phasing of all forms of infrastructure will meet the needs of the new community as they arise and will not exacerbate existing problems". The development of the Easton Park and West of Braintree GCs will also deliver a new Rapid Transit System (RTS) to improve connections between London Stansted, the GCs, Great Dunmow and Braintree. The additional sustainable transport route will support improved per capita emission rates not only for the future residents at the GCs but also the existing and future residents and employees at Great Dunmow and Stansted/ Stansted Mountfitchet with the potential for significant long term positive effects.

- 10.66 New allocations at Saffron Walden are limited over the plan period to deliver a total of around 315 dwellings, 1ha of employment land (excluding sites with existing planning permission), and 3 brownfield Development Opportunity Sites (totalling less than 2ha) within the town centre. The site allocation policies for Saffron Walden (SAF1 - SAF15) each require appropriate transport/ air quality assessments to accompany any development proposals, which will support the management and facilitation growth in the settlement which is recognised for significant highways constraints but also its role at the top of the settlement hierarchy. Therefore providing access to services, facilities and retail supporting the needs of the district, and reducing the need to travel further afield for many of the smaller settlements.
- 10.67 Further to this, the spatial strategy includes the provision for a minimum net increase of 16,000 jobs in the period (Policy SP4), recognising that the delivery of a successful economy is linked to Stansted Airport, and good connections along the M11 and rail network to the north and south, and east along the A120. Further employment development that focuses on this infrastructure as an economical asset is likely to increase pressures on the infrastructure by attracting more users and exacerbate per capita emissions and existing air quality issues, with the potential for significant long term negative effects. In developing the Plan, the Council has recognised, and taken into account, the need to reflect the London Stansted Cambridge Corridor (LSCC) Vision. In this context Local Authorities are required to deliver sustainable growth through working with partners to secure investment in major infrastructure including increasing rail capacity on the West Anglia Mainline and maximising the opportunities that Crossrail 2 can deliver, together with road improvements including a new junction on the M11 at 7A and improvements to Junctions 7 and 8, to the A414, A120, A10 and M25; and delivery of superfast broadband. The commitments under the LSCC Vision will support the facilitation of economic and housing growth within the district to reduce the significance of the potential negative effects, and support opportunities to deliver positive effects in terms of a modal shift or homeworking reducing the need to travel.
- 10.68 The spatial strategy further seeks to strike a balance in the Key Villages and Type A and B Villages of delivering growth that can meet identified local needs without placing unnecessary constraint on existing infrastructure and exacerbating reliance on the private car. Low levels of growth in these areas are proposed, and the site allocation policies largely require transport assessment in consultation with the highways authority.

Appraisal of the Plan as a whole

- 10.69 A number of the wider policies proposed through the Local Plan will also support climate change mitigation, and mitigation for the negative effects emerging as a result of the delivery of development to meet identified needs. Five transport policies are proposed (TA1 - TA4) seeking to address the topics of accessible development, sustainable transport, the provision of electric charging points, vehicle parking standards and new transport infrastructure or measures. This is supported by infrastructure policies (INF1 & INF4) guiding infrastructure delivery and the delivery of high quality communications infrastructure and superfast broadband, as well as design policies (D1, D8, D9 & D10) requiring high quality design, sustainable design and construction, minimal carbon dioxide emissions and highly energy efficient buildings.
- 10.70 Overall, whilst growth will inevitably lead to negative effects in terms of increased traffic and congestion affecting air quality; the spatial strategy seeks to locate the growth in the most

sustainable locations that can support sustainable transport solutions and a reduced need to travel, and reduce per capita emissions and overall contributions to climate change. It should be noted that the Transport Study (update 2018) identified that committed development is likely to have the greatest impact on traffic compared to the additional growth proposed by the Local Plan. The delivery of the GCs and RTS, and commitments under LSCC Vision will improve opportunities for sustainable transport with the potential for significant long term positive effects. This is supported by Local Plan policies that seek sustainable design, construction and energy efficiency to further support climate change mitigation with the potential for minor long term positive effects.

- 10.71 On balance, while there is the potential for both positive and negative effects, the overall level of growth proposed through the Local Plan is likely to lead to a residual minor negative effect on climate change mitigation.

Commentary on cumulative effects

- 10.72 Development proposed in the Local Plan has the potential to interact with development proposed through other plans within and outside the HMA. The Council has worked closely with other HMA and wide Local Authorities and the ECC to mitigate for the potential impacts of increased growth on local and strategic highways infrastructure and resulting increase in greenhouse gas emissions. This includes capacity improvements identified through the A505 Corridor Improvement Feasibility Study (2018), the A120(T)/A120 Corridor Mitigation Strategy (2018) and the proposed delivery of the RTS. It should be noted that the cumulative effect of proposed development in the HMA on the highways network is considered through the Strategic Spatial Options Study, which explored and identified options for spatially distributing the housing need across the HMA. This work was also informed by transport modelling. A signed Memorandum of Understanding (MoU) (2017) has been produced, which identifies a number of new infrastructure interventions that will be necessary. Upgrades to junctions and enhancements to public transport and pedestrian and cycle infrastructure will help to limit potential negative effects and secure positive effects in this regard.

SA objective 7: reduce and control pollution

Commentary on the spatial strategy

- 10.73 The spatial strategy focuses the majority of development at the three GCs and Market Towns of Saffron Walden and Great Dunmow. The GCs are not located within Air Quality Management Areas (AQMAs) nor poor air quality zones, and seek to deliver a high level of self-containment. Nonetheless, it is considered that the scale of growth proposed through the GCs is likely to increase emissions (particularly associated with transport) and noise levels in certain areas of the district. In accordance with Policy SP5 (Garden Community Principles) the GCs will include *“integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport”*. The policy specifically seeks to ensure that *“opportunities for smarter and sustainable travel will be maximised, with links to neighbouring settlements provided that reduce the reliance on the private car”* and that *“the phasing of all forms of infrastructure will meet the needs of the new community as they arise and will not exacerbate existing problems”*. The development of the Easton Park and West of Braintree GCs will also deliver a new Rapid Transit System (RTS) to improve connections between London Stansted, the GCs, Great Dunmow and Braintree. The additional sustainable transport route will support improved per capita emission rates not only for the future residents at the GCs but also the existing and future residents and employees at Great Dunmow and Stansted/ Stansted Mountfitchet with the potential for significant long term positive effects for climate change mitigation.
- 10.74 It is recognised that all Garden Communities have good access to the strategic road network; Easton Park and Land West of Braintree have good access onto the A120, Land West of Braintree will be able to utilise sustainable transport infrastructure in Braintree, and North of Uttlesford benefits from its proximity to M11 Junction 9, Great Chesterford Railway Station and Whittlesford Parkway Railway Station. However, the Transport Study (2017) highlights

these locations as noticeable strategic and local congestion hotspots within the district. In this context, the Transport Study (2017) identifies eight roads within Uttlesford forecast to exceed their theoretical link capacity without any Local Plan development. This includes M11 Junction 7 - 9 and two sections of the A120. Focusing development around these roads through the spatial strategy, and specifically through the delivery of the Garden Communities, therefore has the potential to exacerbate capacity issues in these areas.

- 10.75 It is anticipated that strategic and local highway improvements proposed through the Plan; and mitigation measures identified through the Transport Study (2017), will likely reduce residual adverse effects on transport infrastructure within the district. Consideration is also given in this respect to cross-boundary transport strategies including the A505 Corridor Improvement Feasibility Study (2018), the A505 Corridor Improvement Feasibility Study (2018), and further work to be undertaken by the Cambridgeshire and Peterborough Combined Authority which propose sub-regional improvements and interventions.
- 10.76 The Spatial Strategy directs a level of growth at Saffron Walden and Great Dunmow; recognising that both provide key services to a wide rural hinterland but have constraints to how much further growth can be accommodated, especially the former given the Air Quality Management Area (AQMA) present. The spatial strategy seeks to balance the need to support the vitality and viability of Market Towns and their role in the settlement hierarchy with the constraints in terms of infrastructure requirements and air quality issues. To address air quality issues in Saffron Walden new allocations are limited over the plan period to deliver a total of around 315 dwellings, 1ha of employment land (excluding sites with existing planning permission), and 3 brownfield Development Opportunity Sites (totalling less than 2ha) within the town centre. The Transport Study (2017), the Saffron Walden Transport Assessment (2013/14 and updated 2017), and the Uttlesford Cycling Strategy (2014 and 2018 draft) consider the impacts of development on the transport network within the Market Towns. Mitigation measures proposed through these evidence documents include diverting traffic from the centres (i.e. the Peaslands Road Corridor), providing a core cycling network in Saffron Walden, and improving cycling on the A120 corridor. This would help reduce vehicular pollution levels and manage air quality; particularly within the AQMA where baseline conditions are poorest. In this context it is noted that the County Council and the Council are exploring ways of looking at longer term growth via a separate Saffron Walden Town Transport Study that would inform a future review of the Local Plan. Addressing high levels of air pollution and congestion would contribute positively towards achieving sustainable growth in the constrained Market Towns; facilitating improved access via sustainable transport.
- 10.77 There is some growth proposed in the rural settlements (Key Villages and Type A Villages) which may help to reduce the potential impacts of traffic and reduced air quality at Saffron Walden and to a lesser extent Great Dunmow. However, it is also considered that development in the rural settlements may be dependent on the Market Towns for access to services and facilities that are not provided for in the smaller settlements, and therefore may exacerbate adverse effects on roads with existing capacity issues.
- 10.78 A number of specific sustainable transport measures will be delivered from existing Section 106 contributions and relevant future Section 106 contributions within development. A transport assessment and air quality assessment would also be required in a number of instances as part of the planning application process. These are detailed within the site allocation policies, and relate in many instances to proposed development in Saffron Walden given the AQMA present, and Great Dunmow considering its role as the district's centre.
- 10.79 The spatial strategy includes the provision for a minimum net increase of 16,000 jobs in the period (Policy SP4) and recognises that the delivery of a successful economy is linked to Stansted Airport, and good connections along the M11 and rail network to the north and south, and east along the A120. The spatial strategy therefore seeks to focus a significant proportion of employment provision in close proximity to these strategic routes, capitalising upon accessibility to destinations outside of the district, including London, Cambridge, Bishop's Stortford, Chelmsford and Braintree, with these locations providing shopping, entertainment and services to Uttlesford residents.

10.80 These key roads are identified as Poor Air Quality Zones and focussing employment development in these areas is likely to exacerbate existing air quality issues, with the potential for significant long term negative effects. In developing the Plan, the Council has recognised, and taken into account, the need to reflect the London Stansted Cambridge Corridor (LSCC) Vision. In this context local authorities are required to deliver sustainable growth through working with partners to secure investment in major infrastructure including increasing rail capacity on the West Anglia Mainline and maximising the opportunities that Crossrail 2 can deliver, together with road improvements including a new junction on the M11 at 7A and improvements to Junctions 7 and 8, to the A414, A120, A10 and M25; and delivery of superfast broadband. The commitments under the LSCC Vision will support the facilitation of economic and housing growth within the district to reduce the significance of the potential negative effects, and capitalise upon opportunities to improve access via sustainable transport.

Appraisal of the Plan as a whole

- 10.81 Road transport is a major contributor to pollution and decreased air quality, and it is exacerbated by the presence of the M11 motorway in the area. A number of the wider policies proposed through the Local Plan seek to reduce emissions and pollution, and provide mitigation for the impacts likely to arise as a result of committed and proposed growth to meet identified needs. Five transport policies are proposed (TA1 – TA4) seeking to address the topics of accessible development, sustainable transport, the provision of electric charging points, vehicle parking standards and new transport infrastructure or measures. This is supported by infrastructure policies (INF1 & INF4) guiding infrastructure delivery and the delivery of high quality communications infrastructure and superfast broadband, as well as design Policy D9 requiring minimal carbon dioxide emissions. The policies will support sustainable transport solutions that minimise effects associated with emissions, and support a reduced need to travel.
- 10.82 Policy EN15 focuses on Air Quality, identifying requirements for development to demonstrate “*that it does not lead to significant adverse effects on health, the environment or amenity from emissions to air*”, or “*where a development is a sensitive end-use, that there will not be any significant adverse effects on health, the environment or amenity arising from existing poor air quality*”. Further to this, any development within an AQMA (at Saffron Walden) “*will also be expected to contribute to a reduction in levels of air pollutants within the AQMA*”.
- 10.83 Policy EN14 seeks to manage the potential impacts of exposure to pollutants, Policy EN17 sets criteria for noise sensitive development, restricting development where “*the occupiers of surrounding land or the historic and natural environment is exposed to unacceptable adverse levels of noise and/ or vibration*”. Policy EN18 also provides criteria to manage the effects of light pollution, including ensuring that “*it does not have an unacceptable adverse impact on neighbouring uses or the wider landscape*”, “*the alignment of lamps and provision of shielding minimises spillage, glare and glow, including into the night sky*”, and “*the level of lighting and its period of use is the minimum necessary for security and operational purposes*”.
- 10.84 Overall, whilst growth will inevitably lead to negative effects in terms of increased traffic and congestion affecting air quality; the spatial strategy seeks to locate the growth in the most sustainable locations that can support sustainable transport solutions and a reduced need to travel. Alongside the delivery of transport and infrastructure improvements, the provisions of the Local Plan seek to reduce the extent and significance of these inevitable effects in facilitating growth. Despite this, a residual minor negative effect is still predicted at this stage.

Commentary on cumulative effects

- 10.85 Development proposed in the Local Plan has the potential to interact with development proposed through other plans within and outside the HMA, particularly in consideration of the GCs and the West of Braintree site. The Council has worked closely with other HMA and wide Local Authorities and the ECC to mitigate for the potential impacts of increased growth on local and strategic highways infrastructure and resulting increase in atmospheric pollution. This includes delivering high levels of self-containment at the GCs, capacity improvements

identified through the A505 Corridor Improvement Feasibility Study (2018), the A120(T)/A120 Corridor Mitigation Strategy (2018) and the proposed delivery of the RTS. It should be noted that the cumulative effect of proposed development in the HMA on the highways network is considered through the Strategic Spatial Options Study, which explored and identified options for spatially distributing the housing need across the HMA. This work was also informed by transport modelling. A signed Memorandum of Understanding (MoU) (2017) has been produced, which identifies a number of new infrastructure interventions that will be necessary. Upgrades to junctions and enhancements to public transport and pedestrian and cycle infrastructure will help to limit potential negative effects and secure positive effects in this regard.

SA objective 8: to reduce the risk of flooding

Commentary on the spatial strategy

- 10.86 Uttlesford District consists of a number of watercourses flowing away from the centre of the district to beyond its boundary. The principal watercourses in the district are:
- The River Cam (or Granta) in the north of the district;
 - The River Pant in the east of the district;
 - The River Chelmer and Stebbing Brook in the southeast of the district; and
 - The River Roding, River Stort, Pincey Brook and Stansted Brook in the south and west of the district.
- 10.87 The Uttlesford Strategic Flood Risk Assessment (SFRA) (2016) and the Environment Agency's Risk of Surface Water Flooding Maps (2018) show the flood risk across the district. The SFRA (2016) identifies that the region is prone to localised flooding, with the main source of flooding from fluvial and surface water sources. However, it is recognised that just over 96% of the district lies within Flood Zone 1 where there is a low probability of fluvial flooding.
- 10.88 In terms of the Garden Communities; Easton Park and West of Braintree Garden Communities contain areas of Flood Zone 2 and 3 (of high risk of flooding). This is located along the western boarder of Easton Park; and in terms of West of Braintree, flood risk is largely concentrated around the River Ter in the south-west of the site (within Uttlesford District), and around a tributary of the River Ter running centrally through the site, and in the vicinity of the River Brain to the east of the site (within Braintree District). In terms of mitigating against adverse effects, the spatial strategy (specifically policies SP6 and SP8) requires development to resolve any flood risk issues; "*providing Sustainable Urban Drainage systems to provide water quality, amenity and ecological benefits as well as flood risk reduction*".
- 10.89 There are site allocations with fluvial flood risk issues in Saffron Walden, notably the North Stanstead Employment Area where < 50% intersects with Flood risk zone 2 or 3. Site allocation polices require, where necessary, that applications for development be accompanied by a Flood Risk Assessment and Approved Drainage Strategy. This will contribute positively towards resolving flood risk issues.
- 10.90 Areas of flood risk are present within the majority of the Market Towns, Key Villages and Type A Villages and the allocation sites are predominantly affected by surface water flood risk. In this respect wider Local Plan policies explored under the next heading will be key to minimising the potential for negative effects on flood risk as a result of the spatial strategy.

Appraisal of the Plan as a whole

- 10.91 There are a number of other policies within the Plan which will contribute positively towards managing and mitigating against flood risk in the district. In line with Policy EN10 (Minimising Flood Risk) 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. Further to this, all proposals for development of 1 hectare or above in Flood Zone 1 and for development in Flood Zones 2 (or 3a) must be accompanied by a flood risk assessment that sets out the mitigation measures for the site and agreed with the relevant authority. The Council will work with developers, the Environment Agency and the Lead Local Flood Authority to implement flood alleviation schemes as set out in the SFRA (2016). Notably, Essex County Council are currently implementing a Flood Alleviation Scheme in Thaxted.

- 10.92 All proposals for new development will also be required to manage and reduce surface water run-off, in line with Policy EN11 (Surface Water Flooding). In this context all new development must include Sustainable Urban Drainage Systems (SuDS), and consideration must be given to *“relevant local or national standards and the impact of the Water Framework Directive on flood risk issues”*.
- 10.93 Policy D8 (Sustainable Design and Construction) requires that development *“will not increase flood risk on or off the site”*. Similarly, Policy H12 (Agricultural/Rural Workers’ Dwellings) requires that in terms of agricultural/rural workers’ dwellings, proposed dwellings should *“satisfy planning requirements including impact on flood risk”*.
- 10.94 Policy H3 (Subdivision of Dwellings and Dwellings in Multiple Occupancy) requires that *“if the dwelling is located within a flood risk area, no residential unit is created without access to a first floor level for refuge”*. This will contribute towards controlling potential adverse effects of flooding in terms of the subdivision or multiple occupancy of residential properties.
- 10.95 Overall, the Plan policies seek to ensure that the risk of flooding is fully considered as part of new development proposals. While it is recognised that a number of watercourses flow through the district, it is also noted that over 96% of the district lies within Flood Zone 1 where there is a low probability of fluvial flooding. The Plan requires that the proposed Garden Communities and site allocations proposed for development are, as far as possible, outside areas known to be at risk from flood risk or are required to provide appropriate mitigation and safeguards. In this context, the Council will work with the Environment Agency, developers and the Lead Local Flood Authority to achieve sustainable local flood mitigation measures as part of development.
- 10.96 It is recognised throughout the Plan that surface water flooding is also a constraint for the district, and as such development proposals must incorporate SuDS, which will achieve multiple flood risk benefits.
- 10.97 On balance, it is appropriate to conclude residual neutral effects at this stage, i.e. it is not possible to conclude positive or negative effects on the baseline.

Commentary on cumulative effects

- 10.98 Uttlesford is part of three different Catchment Flood Management Plan (CFMP) areas: the Great Ouse CFMP, the Thames CFMP and the North Essex CFMP. These Catchment Management Plans will address cumulative effects of development within the CFMP areas; recommending ways of managing the risk now and over the next 50 to 100 years.
- 10.99 It is considered, in terms of cumulative effects of new development in relation to surface water and fluvial flooding, that the provisions of the NPPF (2018) and measures and policy approaches implemented through the relevant plans and proposals will limit the significance of effects.
- 10.100 In this context, in accordance with the Essex Local Flood Risk Management Strategy (2013) Essex County Council Environment, Sustainability and Highways (as Lead Local Flood Authority for Essex under the Flood and Water Management Act 2010), and district councils must contribute to the achievement of sustainable development when carrying out flood risk management functions. The Strategy (2013) sets out the roles and responsibilities of the various authorities in terms of local flood risk. The Strategy defines nine objectives for management of local flood risk which will be delivered through a series of local measures and actions.

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

Commentary on the spatial strategy

- 10.101 The Uttlesford District Council Transport Study addendum (2017) found that even with no Local Plan development, congestion will increase throughout the district due to committed developments within the district and adjacent districts; and the attractiveness of distant employment locations by car.
- 10.102 Transport is therefore a key issue in the district, with above average long-distance car commuting and resulting impacts on strategic and local transport infrastructure. In terms of potential options for growth, the Transport Study (2017) found that the delivery of new garden communities at North Uttlesford, Easton Park and West of Braintree have the least traffic impact, the best accessibility and have the most potential for sustainable transport compared with other alternatives. The spatial strategy therefore seeks focusing a significant level of growth at the three Garden Communities; delivering 4,820 new homes by 2033. Each garden community will demonstrate high levels of self-containment, delivering new services, facilities and employment to meet the needs of residents and reducing the need to travel.
- 10.103 It is recognised that all Garden Communities have good access to the strategic road network; Easton Park and Land West of Braintree have good access onto the A120, Land West of Braintree will be able to utilise sustainable transport infrastructure in Braintree, and North of Uttlesford benefits from its proximity to M11 Junction 9, Great Chesterford Railway Station and Whittlesford Parkway Railway Station. However, the Transport Study (2017) highlights these locations as noticeable strategic and local congestion hotspots within the district. In this context, the Transport Study (2017) identifies eight roads within Uttlesford forecast to exceed their theoretical link capacity without any Local Plan development. This includes M11 Junction 7 - 9 and two sections of the A120. Focusing development around these roads through the spatial strategy, and specifically through the delivery of the Garden Communities, therefore has the potential to exacerbate capacity issues in these areas.
- 10.104 It is anticipated that strategic and local highway improvements proposed through the Plan; and mitigation measures identified through the Transport Study (2017), will likely reduce residual adverse effects on transport infrastructure within the district. Consideration is also given in this respect to cross-boundary transport strategies including the A505 Corridor Improvement Feasibility Study (2018), and the A505 Corridor Improvement Feasibility Study (2018) which propose sub-regional improvements and interventions.
- 10.105 In terms of the Garden Communities, the IDP identifies that all three locations will be required to deliver a package of sustainable transport measures to include bus, walking and cycling routes. This aligns with the Garden Community principles set out in Policy SP5 (Garden Community Principles); *“supporting walking, cycling and public transport as the most attractive forms of local transport”*. In this context, Policy SP6 (Easton Park Garden Community) incorporates, from the early delivery phase of the garden community, a *“package of measures to provide transport choice, including the delivery of a direct, high quality, frequent and fast rapid transit priority measures to London Stansted Airport and beyond, and bus / rapid transit measures to Great Dunmow town centre and beyond, and a network of direct, safe walking and cycling routes to enhance permeability within the site and to access other nearby destinations, including connections with and improvements to the Flitch Way”*. This will contribute positively towards increasing and improving the availability and useability of sustainable transport modes.
- 10.106 The District Transport Study Technical Notes (2017) highlights that 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 negligible. The Transport Study (2017) notes the opportunities presented by the Garden Communities to increase uptake of sustainable travel, and this is reflected to an extent through the spatial strategy. Notably, the delivery of the RTS will likely support a

- reduced reliance on the private vehicle and promote the use of sustainable transport modes for access to employment; particularly the North Stansted Employment Area (Policy SP11).
- 10.107 However, it is noted that none of the Garden Communities are expected to deliver a new railway station and as such will rely on existing infrastructure in this respect. In this context the delivery of 5,000 new homes at the North of Uttlesford Garden Community may lead to capacity issues at Audley End, Great Chesterford and Whittlesford Parkway rail stations. While Policy SP7 (North Uttlesford Garden Community) includes the “*delivery of high quality, frequent and fast public transport services to Audley End, Great Chesterford and Whittlesford Rail Stations*”, it is noted that it does not include improvements to the existing railway stations (or their facilities i.e. parking). Rail improvements are however proposed along the West Anglia Mainline and Braintree Branch Line, increasing service capacity into London (Policy TR4).
- 10.108 The Spatial Strategy directs a level of growth at Saffron Walden and Great Dunmow; recognising that both provide key services to a wide rural hinterland but have constraints to how much further growth can be accommodated, especially the former given the Air Quality Management Area (AQMA) present. In this context, the Transport Study (2017), the Saffron Walden Transport Assessment (2013/14 and updated 2017), and the Uttlesford Cycling Strategy (2014 and 2018 draft) consider the impacts of development on the transport network within the Market Towns. Mitigation measures proposed through these evidence documents include diverting traffic from the centres (i.e. the Peaslands Road Corridor), providing a core cycling network in Saffron Walden, and improving cycling on the A120 corridor. This would help reduce vehicular pollution levels and manage air quality; particularly within the AQMA where baseline conditions are poorest. In this context it is noted that the County Council and the Council are exploring ways of looking at longer term growth via a separate Saffron Walden Town Transport Study that would inform a future review of the Local Plan. Addressing high levels of air pollution and congestion would contribute positively towards achieving sustainable growth in the constrained Market Towns; facilitating improved access via sustainable transport.
- 10.109 There is some growth proposed in the rural settlements (Key Villages and Type A and Type B villages) which may help to reduce the potential impacts of traffic and reduced air quality at Saffron Walden and to a lesser extent Great Dunmow. However, it is also considered that development in the rural settlements may be dependent on the Market Towns for access to services and facilities that are not provided for in the smaller settlements, and therefore may exacerbate adverse effects on roads with existing capacity issues.
- 10.110 A number of specific sustainable transport measures will be delivered from existing Section 106 contributions and relevant future Section 106 contributions within development. A transport assessment and air quality assessment would also be required in a number of instances as part of the planning application process. These are detailed within the site allocation policies, and relate in many instances to proposed development in Saffron Walden given the AQMA present, and Great Dunmow considering its role as the district’s centre.
- 10.111 A number of employment allocations proposed through the Plan have less than satisfactory access via sustainable transport. Employees accessing these locations are therefore anticipated to still rely on the private car for access. Policy LtCHE1 (Chesterford Research Park), for example, is located relatively close to Great Chesterford railway station; however, it is considered largely beyond reasonable walking distance. Opportunities should be capitalised on at this location to support improved sustainable access.

Appraisal of the Plan as a whole

- 10.112 The transport section of the Plan (Policies TA1 - TA4) seeks to ensure that development and transport planning will be co-ordinated to reduce the need to travel by car, increase public transport use, cycling and walking and improve accessibility and safety in the district while accepting its rural nature. This will be achieved by improving strategic road and rail connections, promoting transport choice through improvements to public transport services as well as promoting improved, safe access to sustainable transport modes by all forms of transport (Policies TA1 Accessible Development and TA2 Sustainable Transport).

- 10.113 Furthermore, Policy TA4 (New Transport Infrastructure or Measures) sets out the provision of new or enhanced transport infrastructure and initiatives to be pursued and implemented (in partnership with the relevant transport providers). Notably, new transport infrastructure to be delivered through the Plan includes rail improvements, strategic and local highway improvements, and the delivery of the Rapid Transport Corridors. The delivery of this infrastructure will support sustainable connectivity throughout the district.
- 10.114 Policy TA3 (Provision of Electric Charging Points) commits to working in partnership with Essex County Council to delivering electric vehicle charging points. Requirements including “*future proofing measures*” will ensure that demand for electric vehicles can be met as this increases over time.
- 10.115 Policy INF1 (Infrastructure Delivery) seeks to ensure that new development is served and supported by appropriate infrastructure and services identified through the IDP (2018), which includes transport infrastructure. It is also noted that the site allocation policies require supporting infrastructure to be delivered at a rate and scale to meet the needs that arise from the proposed development, in accordance with the IDP (2018) and Transport Strategy (2017).
- 10.116 Overall, the Plan recognises that new development should be linked to existing services and facilities and therefore capitalises upon the opportunity to develop homes in locations where residents have reduced travel between home, job and services and facilities, promoting sustainable transport. To this effect, the new GCs will be highly self-sufficient, located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.
- 10.117 It is recognised that given the rural nature of the district, new residents, including those within the GCs, are likely to look outside of the district to access wider services and employment (e.g. within Cambridge, Bishop’s Stortford or Braintree) with the potential for cross-boundary negative effects on traffic, highways infrastructure and parking. This is considering the district’s limited transport network and existing capacity issues along the M11 and A120 corridors and rail links to London and Cambridge (Transport Strategy, 2017). The plan seeks to avoid and reduce the significance of these effects as much as possible through the provision of new and improved infrastructure delivered at the appropriate time as well as other mitigation measures through plan policies. Notably, Policy TA4 (New Transport Infrastructure or Measures) includes the provision of strategic and local highways improvements, rail improvements, walking and cycling improvements, and rapid transport corridors.
- 10.118 Therefore, based on currently available information, the improvement schemes/measures mentioned above and detailed within the Transport Strategy (2017) are expected to address forecast traffic conditions at key network locations. It is however noted that additional complementary highway improvements and sustainable transport measures may need to be identified through the planning application process for delivery by developers.
- 10.119 On balance, while the evidence suggests that the most significant impacts of proposed development on the highway network can be mitigated, there is still likely to be some residual minor long term negative effects in terms of encouraging the use of sustainable travel. This is given the rural nature of the district and the level of development proposed.

Commentary on cumulative effects

- 10.120 Cumulative effects in this respect relate to the combination of proposed development in neighbouring districts through Local Plans and the Local Transport Plans. Namely, Local Transport Plans for Essex, Cambridgeshire and Hertfordshire County Councils are considered.
- 10.121 The cumulative effects of development are expected to lead to adverse effects including increased traffic flows and congestion on local and strategic highways infrastructure, effects on parking, and also potential impacts on air and noise quality. However, the cumulative effects of improvement schemes that are located both within and outside of the district that are being promoted will likely benefit traffic conditions within Uttlesford. This includes capacity improvements identified through the A505 Corridor Improvement Feasibility Study

(2018) and the A120(T)/A120 Corridor Mitigation Strategy (2018). Upgrades to junctions and enhancements to public transport and pedestrian and cycle infrastructure will help to limit potential negative effects and secure positive effects in this regard.

SA objective 10: to ensure accessibility to services

Commentary on the spatial strategy

- 10.122 The GCs will be developed in accordance with the garden city principles defined by the Town and Country Planning Association (TCPA) and the wider definition of sustainable development outlined in the NPPF. In this context, the design, development and phased delivery of each Garden Community must accord with principles set out in Policy SP5 (Garden Community Principles). This includes the securing of high-quality place making; and ensuring the timely delivery of on-site and off-site infrastructure to address the impact of the new GCs; delivering positive effects both within and outside of the Plan period.
- 10.123 The GCs will deliver a level of services, facilities and employment provision to foster a degree of self-containment and help to minimise the need to travel. The delivery of the proposed Rapid Transit System (RTS) through Policy SP6 (Easton Park Garden Community) is considered likely to improve access between the Garden Communities, Braintree, Great Dunmow and Stansted Airport. The RTS seeks to provide direct, high quality, frequent and fast access to a range of employment opportunities for residents, including the major employment centre at North Stansted Employment Area (Policy SP11). This will contribute positively towards delivering the Vision of the London Stansted Cambridge Corridor (LSCC) and meeting the needs of local people through supporting sustainable access to jobs.
- 10.124 Existing services will also be utilised by residents of the GCs; notably Land west of Braintree is considered a sustainable location due to good access onto the A120 and its proximity to the local facilities and transport infrastructure in Braintree. The RTS proposed at Easton Park will also provide streamlined access to a range of services in Great Dunmow, which includes health facilities and two primary schools, as well as a range of shops and services located within the Town Centre. Easton Park Garden Community (Policy SP6) will also include a network of direct, safe walking and cycling routes to enhance permeability within the site and to access other nearby destinations. This includes connections with and improvements to the Flich Way; a linear country park which runs east west through the district along the old railway line from Hatfield Forest to Braintree, providing access via walking and cycling. This will support accessibility and social inclusion in this respect.
- 10.125 Despite this, there is the potential for increased pressure on existing services as a result of the new GCs. In this context, there may be increased pressure on Audley End, Great Chesterford and Whittlesford Parkway railway stations for access to London and Cambridge (in addition to other employment centres) as a result of the 5,000 new homes proposed at North Uttlesford Garden Community. While Policy SP7 (North Uttlesford Garden Community) includes the “*delivery of high quality, frequent and fast public transport services to Audley End, Great Chesterford and Whittlesford Rail Stations*”, it is noted that it does not include improvements to the existing railway stations (or their facilities i.e. parking).
- 10.126 Pressure on services and facilities in the key settlements may also be experienced from rural villages. Outside of the Market Towns it is recognised that rural isolation has led to pockets of deprivation, with a level of dependence held on the Market Towns for access to goods and services. This may further exacerbate pressure on the services in these key centres, namely education and healthcare. Adverse effects may therefore arise in this respect, particularly considering the high level of committed development, and the infrastructure needs identified for the district (IDP, 2018). It is however recognised that new residents are still likely to look outside to larger centres outside of the district to access a wider range of goods and services.
- 10.127 In terms of infrastructure delivery, the site allocation policies set out requirements for individual sites. In terms of improving accessibility, in Saffron Walden; Policy SAF1 (Land north of Thaxted Road) requires proposals to make provision for the delivery of a link road between Thaxted Road and Radwinter Road. This policy, among others, will contribute

positively towards reducing congestion and improving access to services and facilities, including employment.

Appraisal of the Plan as a whole

- 10.128 Policy INF1 (Infrastructure Delivery) seeks to provide the timely provision of infrastructure necessary to support the delivery of housing and employment provision in the district. In line with Policy INF1 “*each development must address physical, community, social and green infrastructure*”. Policy INF1 recognises that significant investment in infrastructure is required to meet the needs of residents and businesses. This will support the socio-economic growth of the district, ensuring that new development is served and supported by appropriate infrastructure and services identified through the IDP (2018).
- 10.129 In line with Policy SP4 (Provision of Jobs) provision will be made for a minimum net increase of 16,000 jobs in the plan period. As discussed above, a significant proportion of this will be delivered through the London Stanstead Airport strategic allocation (Policy SP11); which incorporates the North Stansted Employment Area. This 55ha site is allocated for B2 and B8 employment uses and will serve the strategic role of London Stansted Airport and associated growth of business, industry and education, which are important for Uttlesford, the sub-regional and national economy.
- 10.130 Business growth and therefore access to employment will also be secured through the development of the Chesterford Research Park; which is progressing in accordance with the masterplan approved by the Council (Local Plan Section 13: Non-Residential Allocation). The overall employment strategy is proposed through Policy E1 (Employment Strategy) which sets out where employment will be supported, protected, and enhanced, throughout the district. This will support self-containment of the district and improve access to a range of high quality jobs within a variation of sectors.
- 10.131 A range of other policies are of relevance to achieving access to services; including the ‘Transport’ policies within Section 7. Policy TA1 (Accessible Development) seeks to co-ordinate development and transport planning to improve accessibility in the district; while accepting its rural nature. To this effect, Policy TA1 requires that “*New development should be located where it can be linked to services and facilities by a range of transport options including safe and well-designed footpaths and cycle networks, public transport and the private car*”. This is further committed to through Policy TA4 (New Transport Infrastructure or Measures) which identifies Rapid Transport Corridors as a measure to “*support sustainable transportation connectivity between Braintree - Great Dunmow, Stansted Airport and Bishop’s Stortford*”; and to “*support connectivity to Cambridge from the north of the district*”. This will contribute positively towards sustainable growth, improving access to jobs, shopping, services and leisure facilities.
- 10.132 Overall, it is considered that the Plan focuses growth where people will have better access to facilities and the opportunity to make best use of public transport. However, given the rural nature of the district it is considered that there may remain pockets of deprivation, and a level of pressure on the services and facilities within the Market Towns. Many people live in smaller settlements with facilities concentrated in centres outside of the district and in Saffron Walden and Great Dunmow. As such, service infrastructure proposed through the Plan seeks to contribute positively towards reducing increased pressure on the key centres (IDP, 2018).
- 10.133 In line with Garden Community principles (Policy SP5) the three GCs will deliver high levels of self-containment; providing new residents with access to services and facilities including employment, schools, recreation, shopping facilities, greenspaces and integrated transport systems. Further to this it is recognised that phasing, infrastructure and delivery plans will form part of the development plan document for each Garden Community, establishing the scale and pace of growth, where development will take place and when. This will contribute positively towards ensuring access to services, guaranteeing that the needs of the new communities are met as and when the need arises; and impacts on surrounding settlement are minimised.

10.134 On balance, it is considered appropriate to conclude that the Plan would have significant positive long-term effects in terms of ensuring accessibility to services.

Commentary on cumulative effects

- 10.135 Cumulative effects in this respect include the combination of proposed development in neighbouring districts through Local Plans. The cumulative effects of development are expected to lead to adverse effects in terms of accessibility, including increased traffic flows and congestion on local and strategic highways infrastructure, effects on parking, and also potential impacts on air and noise quality. However, the cumulative effects of improvement schemes that are located both within and outside of the district that are being promoted will likely benefit traffic conditions within Uttlesford. This includes capacity improvements identified through the A505 Corridor Improvement Feasibility Study (2018) and the A120(T)/A120 Corridor Mitigation Strategy (2018). Upgrades to junctions and enhancements to public transport and pedestrian and cycle infrastructure will help to limit potential negative effects and secure positive effects in this regard.
- 10.136 The cross-boundary importance of the LSCC Core Area is recognised, comprising the Local Planning Authorities (LPAs) of Broxbourne, East Hertfordshire, Epping Forest Harlow and Uttlesford. The interaction between new development proposed through LPA Local Plans within the LSCC has the potential to lead to cumulative effects. These effects are likely to be significant and positive in terms of improving access to employment; meeting the needs of local people and supporting sustainable economic growth throughout the corridor. In this context, it is noted that the delivery of the RTS is one particular aspect of the LSCC Vision which will proactively improve accessibility throughout the corridor.
- 10.137 Part of the mechanism for delivering the LSCC Vision has been establishing the Objectively Assessed Economic Need (OAEN) of the FEMA (the combined area of East Hertfordshire, Epping Forest, Harlow and Uttlesford Districts). The delivery of the economic preferred growth scenario across the FEMA balances job growth with growth in homes; seeking to secure good access to social, leisure, community, health facilities and education. Cumulative effects in this respect will likely be significant, positive and long-term.
- 10.138 Cumulative effects are anticipated in relation to proposals for London Stanstead Airport. The wider strategic allocation serves the strategic role of London Stansted Airport and associated growth of business, industry and education, including aviation engineering, distribution and service sectors and the airport college which are important for Uttlesford, the sub-regional and national economy. Cumulative effects in this respect will likely be significant, positive and long-term.
- 10.139 It should be noted that the cumulative effect of proposed development in the HMA on the highways network is considered through the Strategic Spatial Options Study, which explored and identified options for spatially distributing the housing need across the HMA. This work was also informed by transport modelling. A signed Memorandum of Understanding (MoU) (2017) has been produced, which identifies a number of new infrastructure interventions that will be necessary.

SA objective 11: to improve the population's health and promote social inclusion

Commentary on the spatial strategy

- 10.140 In terms of improving health and promoting social inclusion, key issues relate to the need to address any areas of rural deprivation, plan for the needs of an ageing population, protecting and enhancing important green assets, and ensure that new and existing communities have adequate access to community infrastructure, including health and recreation facilities.
- 10.141 The IDP (2018) recognises that the GCs will have a significant impact on surrounding existing infrastructure, namely GP practices. The first completions are not until 2022; however, this will be a major trigger point. The IDP (2018) further states that an options paper for Dunmow in particular will be needed to agree the infrastructure in time for the growth. It is noted that the IDP (2018) is not able to accurately determine the nature of any infrastructure requirements related to hospital-based care.
- 10.142 It is recognised that a level of community infrastructure will be delivered within the GCs to mitigate against adverse effects and contribute towards self-containment of the new settlements (Policies SP6 - SP8). To this effect, the delivery of the proposed Rapid Transit System (RTS) through Policy SP6 (Easton Park Garden Community) is considered likely to improve access to the between the GCs, Braintree, Great Dunmow and Stansted Airport.
- 10.143 Further positive effects are anticipated in relation promoting social inclusion within the Market Towns through the delivery of new retailing, employment, secondary school and open spaces. The spatial strategy also seeks to capitalise upon the Market Towns' good opportunities for walking and cycling, particularly within Saffron Walden, improving the attraction of the town for residents and visitors. The uptake of sustainable travel in the town centre will likely reduce reliance on the car for short journeys, improving the physical and mental health of residents and visitors alike. This is a key issue for the town considering the AQMA present. However, given the rural nature of the district it cannot be overlooked that the private vehicle may still be relied upon for longer journeys. This may adversely affect the population's health, for example through exacerbating air quality issues in and around Saffron Walden AQMA.
- 10.144 The spatial strategy seeks to deliver strategic scale employment development which will support access to jobs and promote social inclusion; utilising the district's role within the London Stansted Cambridge Corridor (LSCC). However, it is recommended that consideration be given to improving access via sustainable transport to and from the key infrastructure delivery sites; namely Chesterford Retail Park and North Stansted. Enhancements to cycle routes in accordance with the recommendations of the Uttlesford Cycling Strategy (2014 and 2018 draft), for example, would promote active travel and deliver associated physical and mental health benefits for all.
- 10.145 The spatial strategy places focus on improving the population's health through protecting and enhancing the green infrastructure network. Most of the settlements within Uttlesford district are within 400m of their nearest amenity greenspace; however, the IDP (2018) sets out that there is a need for 44.54ha of natural and semi-natural green spaces and 2.6ha of amenity green spaces to address the needs arising from commitments and allocations within the Plan period. The Plan seeks to deliver this necessary provision, first and foremost through the GCs. For example, the Easton Park Garden Community (Policy SP6) "*will provide natural, semi-natural and amenity green space in accordance with standards established in the Local Plan, the Essex Design Guide, and the Strategic Growth Development Plan Document*".
- 10.146 However, it is also recognised that high levels of growth outside of settlements through the delivery of the Garden Communities has the potential to result in damage to/ loss of green field land and access to the countryside. Policy SP5 (Garden Community Principles) and other policies within the Plan therefore seek to ensure that footpaths, cycleways, bridleways and other green routes, will be protected and enhanced, ensuring they are safe, accessible and well connected to services and facilities. This is in accordance with the recommendations

of the Uttlesford Open Space, Sport Facility and Playing Pitch Strategy (2012), the Uttlesford Cycling Strategy (2014 and 2018 draft), and the IDP (2018).

Appraisal of the Plan as a whole

- 10.147 Policy INF1 (Infrastructure Delivery) sets out the broad requirements for the delivery of infrastructure to support development; requiring that “*all new development take account of the needs of new and existing populations*”. Further to this, in accordance with the most up to date Sport Strategy new development will be required to “*make appropriate on-site provision or financial contributions to off-site provision of indoor and outdoor sports facilities*” (Policy INF2). The site allocation policies set out these requirements for individual sites.
- 10.148 Policy EN8 (Open Spaces) seeks to protect open spaces, avoiding the loss of features that are prominent elements and enhance the local environment. These areas are generally protected by excluding them from defined development limits (Policy SP9 Development within Development Limits), leading to long-term positive effects in terms of access to natural greenspace. Regard should also be given in this respect to Policy SP10 (Protection of the Countryside) and Policy C1 (Protection of Landscape Character) as well as the design policies in the Design section of the Plan.
- 10.149 In terms of addressing the needs of an ageing population, the infrastructure provisions discussed above will contribute positively towards ensuring social inclusion, improving the safety of elderly residents within the community, and guaranteeing care is provided and accessible. Further to this, the housing section of the plan will ensure the housing needs of this specialist group are met, predominately through Policy H10 (Accessible and Adaptable Housing) and Policy H11 (Specialist Housing). This is discussed further under SA Objective 12.
- 10.150 Overall, the delivery of the Plan will benefit residents through providing housing, employment, infrastructure, facilities, and services as set out within the IDP (2018). In this context, in line with Policy SP5 (Garden Community Principles) the GCs will be underpinned by high quality urban design and placemaking principles; delivering well-planned, beautifully and imaginatively designed development which promotes self-containment.
- 10.151 The wider Plan seeks to ensure there is sufficient access to green infrastructure, in accordance with the need identified through the IDP (2018). Development seeks to enhance the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains where possible. This will contribute towards the development of walkable, vibrant sociable neighbourhoods; leading to positive effects in terms of promoting social inclusion and improving health.
- 10.152 It is recognised that there may be potential for some adverse effects in terms of pressure on infrastructure outside of the Garden Communities; as highlighted through the IDP (2018). Site specific and district-wide policies are however proposed that provide a variety of measures to ensure that the negative impacts of growth on the communities outside of the GCs are minimised, and potential opportunities are realised.
- 10.153 Additionally, policies are co-ordinated to deliver a positive effect on the district’s main settlements, providing new homes and infrastructure to meet localised need throughout the settlements. This may contribute positively towards reducing localised deprivation.
- 10.154 On balance, it is appropriate to conclude that the Plan would have significant positive long term effects in terms of improving the population’s health and promoting social inclusion.

Commentary on cumulative effects

- 10.155 The East of England Biodiversity Delivery Plan (2008) aims to push for regional compliance with the Accessible Natural Greenspace Standard (ANGSt).⁸⁴ Natural England's analysis of Accessible Natural Green Space Provision for Essex, including Southend-on-Sea and Thurrock Unitary Authorities (2009) assesses the accessibility of natural greenspace; providing a summary for the whole of Essex. This provides a key piece of evidence for the planning process, and as such LPAs within Essex are encouraged to take a strategic approach to establish large areas of quality countryside throughout Essex which are good for wildlife and people, recognise the importance of history and culture, and which integrate social and economic benefits.
- 10.156 The provision of natural and semi-natural green space through Local Plan proposals and projects within the area will therefore deliver benefits at a regional, sub-regional and local level. For example, the delivery of West of Braintree Garden Community will include a comprehensive masterplan process including significant green infrastructure delivery, which will align with proposals within Braintree Local Plan.
- 10.157 Cumulative effects are also anticipated in relation to improvements to accessibility; resulting from the in-combination effects of enhancements to public transport and cross-boundary walking and cycling networks.
- 10.158 Access to community services and facilities, i.e. health care provision, may improve through the combined delivery of Local Plans in the area. For example, the delivery of Garden Communities should include new health centres. Hospital care provision is likely to change in the coming years, with contributions likely to be required alongside significant delivery of new homes (as identified through Local Plans). However, it is not currently possible to accurately determine the nature of any infrastructure requirements, and therefore delivery, related to hospital-based care (IDP 2018).

SA objective 12: to provide appropriate housing and accommodation to meet existing and future needs

Commentary on the spatial strategy

- 10.159 Since 2010 the District Council has worked closely with its housing market area partners (Harlow, Epping Forest and East Hertfordshire Councils) to prepare a Strategic Housing Market Area (SHMA). A Memorandum of Understanding (MoU) was signed in March 2017 regarding the spatial distribution of housing across the SHMA. Uttlesford is committed to meeting its housing need within its administrative boundaries.
- 10.160 The spatial strategy allocates sites to support housing growth in accordance with the identified requirement of 14,000 homes over the plan period. Provision to meet this requirement will be made from 3,190 dwellings which have already been built, 1,120 dwellings in windfall sites, 3,939 dwellings in outstanding planning permissions, and 6,380 dwellings in the three GCs, and the towns and villages; as set out in Policy SP3 (The Scale and Distribution of Housing Development).
- 10.161 The delivery of the spatial strategy will lead to significant long term positive effect by meeting the housing requirement, delivering housing across the district, with focus placed on the three new GCs. The GCs will provide housing choice and opportunity for current and future residents; delivering (through Policy SP6 Easton Park Garden Community) "*a mix of housing sizes, and types of housing will be delivered in accordance with housing needs including 40% affordable homes and homes for older people*". Research indicates that housing sites with a larger proportion of affordable homes deliver more quickly, where viable. For both large and small-scale sites, developments with 40% or more affordable housing have a build rate that is

⁸⁴ East of England Biodiversity Forum (2008) The East of England Biodiversity Delivery Plan [online] available at: <http://www.eoebiodiversity.org/delivery-plan-overview.html> last accessed 04/12/18

around 40% higher compared to developments with 10-19% affordable housing obligation.⁸⁵ Given the scale of growth, the Garden Communities will continue to be built beyond the Local Plan period, i.e. after 2033, and thus also contribute towards longer-term growth and development objectives for the district.

- 10.162 In terms of Gypsy and Traveller Accommodation in the district, the 2016 Gypsy and Traveller Accommodation Assessment (GTAA) identified that there is no need for any additional pitches for households that meet the required definition.⁸⁶
- 10.163 As discussed above, it is recognised that a significant level of housing will be delivered through committed development. Larger sites, notably those delivered in the Market Towns (Policy GtDUN8 (Land west of Chelmsford Road) are for 270 dwellings, Policy GtBUN9 (Land west of Woodside Way) for 790 dwellings, and Policy SAF8 (Land south of Radwinter Road) for 200 dwellings).
- 10.164 In line with the spatial strategy, new housing site allocations within the Plan will also deliver a growth at the Market Towns (315 dwellings at Saffron Walden and 767 dwellings at Great Dunmow), which will include a mix of housing types, sizes and tenures, including a proportion of affordable housing. This will contribute positively towards meeting the full objectively assessed needs for market and affordable housing as identified through the SHMA (2017); and will be consistent with the policies set out in the NPPF.

Appraisal of the Plan as a whole

- 10.165 The housing section of the Plan (Policies H1 - H11) seek to ensure that an appropriate mix of housing and accommodation types is provided to meet the needs likely to be generated in the district during the Local Plan period. This includes support for proposals for housing specifically designed to meet the identified needs of older people, specialist accommodation and self-build/custom build housing. This is primarily delivered through Policy H10 (Accessible and Adaptable Housing) and Policy H11 (Specialist Housing), and will lead to positive effects in relation to meeting the housing needs of the elderly, disabled, young and vulnerable adults.
- 10.166 Policy H8 (Self Build and Custom Build) sets out the Council's approach to supporting the provision of self and custom build homes. The Government has made self-build and custom housebuilding an important part of its strategy for increasing housing supply, placing a significant responsibility on LPA's to promote and manage delivery (NPPF, para 50). The Self-build and Custom Housebuilding Act 2015 requires each local planning authority to keep a register of individuals and associations of individuals who are seeking to acquire serviced plots of land in the authority area in order to build houses for those individuals to occupy as homes. The self-build register also provides information about the demand for such housing. Policy H8 therefore supports Self and Custom Build proposals where they seek to address the need and demand for self and custom build housing. This will deliver positive effects in terms of meeting the identified need of local residents.
- 10.167 Policy H6 (Affordable Housing) sets out the affordable housing requirement for new developments coming forward during the plan period (identified through the SHMA 2017 as 19.5% of the district's total housing need). In the light of national policy (which does not permit affordable housing contributions from sites of ten units or less) the Council have considered it appropriate to require developments of eleven dwellings or more to provide 40% of the total number of dwellings as affordable dwellings in order to ensure that the affordable housing need is met. The delivery of this will have a long-term positive effect on housing as it will help to meet the affordable housing need within the district throughout the Plan period. This is reinforced by Policy H7 (Affordable Housing on Exception Sites).

⁸⁵ Nathaniel Lichfield & Partners (2016) Start to Finish: How Quickly do Large-Scale Housing Sites Deliver? [online] available at: <<https://lichfields.uk/media/1728/start-to-finish.pdf>> last accessed 03/12/18

⁸⁶ Uttlesford District Council (2017) Uttlesford Borough Gypsy and Traveller Accommodation Assessment [online] available at: <https://www.uttlesford.gov.uk/media/7120/Uttlesford-Gypsy-and-Traveller-Accommodation-Assessment-Need-Summary-Report-June-2017-/pdf/Gypsy_and_Traveller_Accommodation_Assessment.pdf> last accessed 03/12/18

- 10.168 Policy H2 (Housing Mix) requires new housing developments to “*provide for a mix of house types and sizes to meet the different needs of the local area and the District as a whole*”, as evidenced by the most recent SHMA (2017).
- 10.169 Policy H1 (Housing Density) sets out the average densities for housing development in the towns and settlements in Uttlesford which should be achieved, having regard to Policies D1 – D10 in the Design Section of the Local Plan.
- 10.170 Overall, the Plan will deliver a significant number of new homes (including a mix of types, sizes and tenures, including a proportion of affordable housing) to meet existing and future housing needs of the district. This in line with the conclusions of the SHMA (2017), and the signed MoU (2017) with neighbouring authorities, taking into consideration population projections, affordable housing needs and jobs growth.
- 10.171 Taking the existing supply into account means that the Local Plan needs to deliver 5,751 dwellings on new sites. The distribution of development across the district has been determined having regard to: the spatial vision and objectives; the settlement hierarchy; conformity with national policy; and the suitability, availability and deliverability of sites. In this context, delivering a significant proportion of growth through the GCs will contribute positively towards the delivery of affordable housing, with the potential for significant long term positive effects in this respect. This is supported by the policies within the housing section of the plan (Policies H1-H11) which require 40% affordable housing provision on sites delivering over eleven dwellings (Policy H6).
- 10.172 Further policies within the Plan seek to ensure that housing is delivered at the right scale and in the right location to meet community needs. The Plan recognises the role of the district within the LSCC and utilises the opportunity to capitalise on its transport connections (namely the M11 motorway and London Stansted Airport). The spatial strategy therefore distributes the remaining housing requirement to sustainable locations throughout the district, in accordance with the settlement hierarchy, and reflecting the most up to date local housing need evidence.
- 10.173 In conclusion, it is considered that the Plan will lead to significant positive long term effects in terms of providing appropriate housing and accommodation.

Commentary on cumulative effects

- 10.174 The delivery of the combined level of housing need across the HMA will lead to significant positive cumulative effects in terms of meeting the sub-regional housing demands.

SA objective 13: to promote the efficient use of resources, including land and ensure the necessary infrastructure to support sustainable development

- 10.175 In terms of natural resources, when considering development proposals, Policy SP12 (Sustainable Development Principles) supports development that will “*minimise the amount of unallocated greenfield land that is developed*”. This therefore includes promoting the efficient use of land; supporting the development of sites located on previously developed (brownfield) land. However, it is recognised that the supply of previously developed land and buildings in the district is limited, and as such which will make a minor contribution to the delivery of development; with the loss of greenfield land inevitable.
- 10.176 Noteworthy site allocations located on greenfield land, and therefore anticipated to result in the loss of this resource, are the larger scale greenfield site allocations (over 100 dwellings) within the Market Towns:
- Great Dunmow
 - Policy GTDUN3 (Woodfield, Woodside Way) 120 dwellings, 5ha.

- Saffron Walden
 - Policy SAF1 (Land north of Thaxted Road) 150 dwellings, 7.92ha.
- 10.177 It is also recognised that the delivery of the GCs (Policies SP5-8) will result in the loss of a considerable amount of greenfield land within the district, with the potential for negative effects in this respect.
- 10.178 The GCs are all located at least partially within Minerals Safeguarding Sites (MSSs); North Uttlesford is partially located within a chalk MSS, the sites within Uttlesford District at West of Braintree are both located wholly within a sand and gravel MSS, and Easton Park is located partially (over 50%) within a sand and gravel MSS. In line with Policies SP6-8, mineral resource sterilisation matters will be sufficiently addressed at the GCs, working in partnership with Essex County Council.
- 10.179 In terms of the site allocations; all sites allocated within Great Chesterford, Great Dunmow, Saffron Walden, Stansted Mountfitchet, and Elsenham are located within MSSs. This is in addition to one site within Felsted, and one within Quendon and Rickling. Under Policy EN13 (Minerals Safeguarding) the Local Planning Authority (LPA) will consult the Minerals Planning Authority where the site is *“greater than 5ha for Sand and Gravel, 3ha for Chalk and 1 dwelling for brickearth or brick clay”*. While numerous sites exceed these thresholds, it is recognised that in line with Policy EN13, development will only be supported *“where it does not unnecessarily sterilise minerals resources or conflict with the effective working of permitted minerals development or Preferred Mineral Site”*.
- 10.180 In terms of infrastructure delivery, as set out within Policy SP5 (Garden Community Principles) and the IDP (2018) development at the three GCs will be required to deliver significant infrastructure improvements to address existing and future constraints. Notably, the delivery of Easton Park Garden Community (Policy SP6) will provide the first phase of a new Rapid Transit System (RTS) which will deliver long-term significant infrastructure improvements between London Stansted Airport, the southern Garden Communities, and the main settlements of Great Dunmow and Braintree. However, it is recognised that there may be a level of dependence on existing infrastructure outside of the GCs; particularly in relation to transportation given the rural nature of the district. In this context, residents of Land West of Braintree will likely utilise local facilities and transport infrastructure in Braintree district. It is also anticipated that there may be increased pressure on Audley End, Great Chesterford and Whittlesford Parkway railway stations for access to London and Cambridge (among other employment centres) as a result of the 5,000 new homes proposed at North Uttlesford Garden Community. While Policy SP7 (North Uttlesford Garden Community) includes the *“delivery of high quality, frequent and fast public transport services to Audley End, Great Chesterford and Whittlesford Rail Stations”*, it is noted that it does not include improvements to the existing railway stations (or their facilities i.e. parking).
- 10.181 The infrastructure constraints, such as highways and access issues associated with growth at other key settlements (e.g. Saffron Walden) are addressed through Plan policies outside of the spatial strategy, namely the site allocation policies, in line with the IDP (2018). In this context, some infrastructure may need to be delivered by numerous sites and may have benefits for residents beyond the development site such as highway junction improvements, and the delivery of open space and sports facilities. To provide the infrastructure required to deliver the spatial strategy, a combination of funding sources will be sought. This includes developer contributions payable by developers towards on and off-site infrastructure provision and through other funding sources including service providers and Government funding, where available.
- 10.182 In terms of infrastructure delivery, the site allocation policies set out requirements for individual sites. In terms of significant infrastructure delivery, in Great Dunmow, Policy GtDUN3 (Woodfield, Woodside Way) requires the delivery of open space provision, including informal recreation areas, and the provision of children’s play spaces. In Saffron Walden; Policy SAF1 (Land north of Thaxted Road) requires proposals to make provision for the delivery of a link road between Thaxted Road and Radwinter Road. These policies, among others, will contribute positively towards achieving attractive sustainable places where people desire to live.

Appraisal of the Plan as a whole

- 10.183 In line with Policy H1 (Housing Density) housing development will be expected to make the most efficient use of land. This will contribute positively towards the protection of the district's natural resources.
- 10.184 In line with Policy EN13 (Minerals Safeguarding) the Minerals Planning Authority (Essex County Council) will be consulted on relevant applications within the MSSs and Minerals Safeguarding Areas (MSAs). Policy EN13 further seeks to provide protection by requiring that proposals located within MSAs which exceed the established thresholds "*be supported by a minerals resource assessment to establish the existence or otherwise of a mineral resource of economic importance*".
- 10.185 The Infrastructure Policies (Policies INF1-9) seek to ensure that development proposed through the Plan is supported by the necessary community facilities, utilities and transport infrastructure; recognising that this is essential to creating sustainable communities. Notably, Policy INF1 sets out the broad requirements for the delivery of infrastructure to support development and the overall growth of Uttlesford.
- 10.186 Overall, development proposed through the Local Plan has the potential for impacts on the quality and quantity of natural resources. The Plan will result in the loss of greenfield land, directing a large proportion of growth to the three GCs and the Market Towns of Saffron Walden and Great Dunmow. The distribution of development across the district has been determined having regard to: the spatial vision and objectives; the settlement hierarchy; conformity with national policy; and the suitability, availability and deliverability of sites. It is therefore recognised that opportunities to utilise previously developed land have been exhausted, with site allocations located on brownfield land where possible.
- 10.187 Given the extent of the Mineral Safeguarding Sites throughout the district, it is considered that the Plan proactively addresses mineral resource sterilisation matters, recognising that mineral resources need to be protected from incompatible/ sensitive development nearby which might constrain mineral production in the future.
- 10.188 It is anticipated that the GCs will contribute positively towards ensuring the provision of sufficient infrastructure in line with projected increases in population. However, it is recognised that infrastructure surrounding the settlements outside of the GCs may experience increased pressure; particularly in terms of sustainable transport infrastructure.
- 10.189 On balance, it is appropriate to conclude long term minor negative effects; however, this conclusion is uncertain, given that there would be a loss of resources under a 'no plan' (or 'future baseline') scenario and that all the alternatives would result in a similar conclusion.

Commentary on cumulative effects

- 10.190 There is the potential for a significant cumulative loss of greenfield land as a result of the distribution of housing to meet the Objectively Assessed Need (OAN) across the Strategic Housing Market Area (SHMA).
- 10.191 In terms of infrastructure, positive cumulative effects are anticipated as a result of the MoUs signed by the four HMA authorities, Essex County Council, Hertfordshire County Council and Highways England in relation to the provision of strategic highways and transport infrastructure. This is to support the delivery of the strategic housing and economic needs of the wider area; leading to positive effects in terms of the growth and vitality of the sub-region.

SA objective 14: to improve the education and skills of the population

Commentary on the spatial strategy

- 10.192 The Spatial Strategy focuses the majority of development at the towns of Saffron Walden and Great Dunmow and the new GCs at Easton Park, West of Braintree and North Uttlesford. In line with the Garden Community principles (Policy SP5) the new GCs will deliver the necessary infrastructure improvements to facilitate development, including education provision. In this context, land and financial contributions within the GCs (Policies SP6 - 8) will contribute towards the delivery of secondary and primary schools and associated facilities. This will contribute positively towards meeting the needs of residents as set out in Table 9 of the Uttlesford Local Plan Infrastructure Delivery Plan (2018).⁸⁷ It will also promote self-containment and reduce the need to travel, with the potential for significant positive effects.
- 10.193 The spatial strategy seeks to ensure that the educational needs of all communities within the district are met; although it is recognised that the Market Towns are set to be a particular focus of growth. In this context the Spatial Strategy identifies that a new secondary school will be delivered in Great Dunmow; reinforcing its function as an important centre for residents who live in the southern part of the district. Additionally, a primary school is proposed within Saffron Walden, supporting its function as the main district centre.
- 10.194 . Outside of the Market Towns, numerous sites are retained through the Plan for education purposes in accordance with the settlement hierarchy set out in Policy SP2 (The Spatial Strategy 2011 - 2033). Maintaining and expanding sites for educational purposes will contribute positively towards ensuring the functionality of settlements; however, it is likely that residents may still travel to the larger settlements for access to schools.
- 10.195 Uttlesford Council is a member of many partnership groups, working to address strategic matters including strategic social infrastructure; namely secondary and higher education. The Vision of the London Stanstead Cambridge Corridor (LSCC) seeks to build upon the corridor's educational opportunities, recognising that this will meet the needs of local people while also supporting sustainable economic growth. In this context, the spatial strategy supports the growth of London Stansted Airport, which includes the development of Harlow College centre of Further Education (Policy SP11). This will run courses in a range of sectors, offering opportunities for people to improve their career prospects and access high skilled jobs. This will contribute positively towards maintaining the high level of skills in the district.
- 10.196 A number of site allocations promote the educational offer of the district. Notably, Policy STA6 safeguards land adjacent to Forest Hall Schools for secondary education use. Part of the development site (approx. 1ha) at land west of Hall Road will be retained for educational purposes as part of expansion of Elsenham Primary School (Policy ELS2).
- 10.197 Land south of Newport Primary School is safeguarded through Policy NEWP5 for potential future education use. This would increase capacity at the existing school, leading to positive effects in terms of access to education.
- 10.198 Policy GtCHE3 (Land adjacent to the east of Great Chesterford Community Centre) and Policy THA3 (Land east of The Mead, Thaxted) safeguard land for "*potential future education use or other community uses*". If education provision is delivered, positive effects would be anticipated. However, this is uncertain at this stage.

⁸⁷ Troy Planning & Design (2018) Uttlesford Local Plan Infrastructure Delivery Plan [online] available at: <<https://www.uttlesford.gov.uk/article/4942/Infrastructure>> last accessed 30/11/18

Appraisal of the Plan as a whole

- 10.199 Policy EMP1 (Employment Strategy) states that *“the Council will 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 will lead to positive effects in terms of improving the education and skills of the population; providing increased education and training facilities to suit the mixed employment base.
- 10.200 Policy INF1 (Infrastructure Delivery) provides the overarching framework for the delivery of infrastructure to support growth in Uttlesford; including social infrastructure (schools and other educational facilities). This will ensure development is supported by the necessary infrastructure, providing sufficient education opportunities to meet local needs.
- 10.201 Policy C4 (New Communities within the Countryside) supports applications for new or replacement education facilities in the countryside; promoting vibrant, mixed and sustainable communities.
- 10.202 Overall, development proposed through the Local Plan will contribute positively towards improving the education and skills of the population, in line with the Vision of the LSCC. The three GCs will benefit residents through new education provision, delivering new primary schools and secondary schools along with other associated provision. Further to this, education provision within the Market Towns will have a positive effect on the district’s residents, both within these key settlements and in surrounding centres. However, reliance on the car to access secondary schools is likely to continue given the high proportion of the district residing outside of the Market Towns, Stansted Mountfitchet and Newport and the rural nature of the district.
- 10.203 Delivering secondary and higher education, specifically through the development of Harlow College, will contribute positively towards maintaining the high level of skills within the district, and the reflected high level of employment. On balance, it is appropriate to conclude that the Plan would have significant long term positive effects in terms of improving the education and skills of the population.

Commentary on cumulative effects

- 10.204 Cumulative effects relate to the LSCC’s Vision to build upon its educational opportunities. New education and training opportunities delivered throughout the LSCC will likely lead to significant long-term positive effects in terms of improving access to education for residents. This will contribute positively towards maintaining the high skillset of the district and will ensure education and training facilities suit the varied employment base.

SA objective 15: to ensure sustainable employment provision and economic growth

Commentary on the spatial strategy

- 10.205 The preferred strategy is to allocate employment land to support job creation in accordance with the findings of the West Essex and East Hertfordshire Assessment of Employment Needs 2017, prepared in coordination with neighbouring authorities within the sub-regional Functional Economic Area (FEMA), and to reflect the employment needs identified through the Joint Economic Report (2015). This considers the wider context within which the district is located and therefore the need to reflect the aspirations and opportunities identified in the London Stanstead Cambridge Corridor (LSCC) Vision. The LSCC is one of the most important and fastest growing economic growth areas in the country; its vision builds on its key strengths including its skilled workforce in sectors such as health, life sciences and pharmaceuticals, advanced engineering and aerospace.

- 10.206 Over the Plan period a minimum of 16,000 jobs will be delivered (Policy SP4 Provision of Jobs) to “*maintain a broad balance between homes and jobs and maintain a diverse economic base*”. In this context, the spatial strategy supports opportunities for “*B-use, non B-use and complimentary sui generis use class employment provision*” within the three GCs (Policy SP5); supporting a high level of self-containment and reducing the need to travel.
- 10.207 To maximise economic benefits it is essential that existing issues of congestion are relieved. In this context, transport links to, and facilities at, employment areas may need to be improved in order to capitalise upon new development. The delivery of the GCs therefore utilises Uttlesford’s locational advantage along the M11 transport corridor. In this context North Uttlesford Garden Community benefits from its proximity to M11 Junction 9, while Easton Park Garden Community capitalises upon its access to Stanstead Airport. Policy SP6 (Easton Park Garden Community) seeks to expand upon this, committing to the delivery of a direct, high quality, frequent and fast Rapid Transport System (RTS). This will improve access to employment for an enlarged population, securing opportunities for residents in a range of sectors.
- 10.208 Whilst it is recognised that a significant level of employment and infrastructure delivery will be outside of existing settlement areas; there is concern that the focus of growth at the GCs may limit the economic growth of existing towns and villages, particularly given West of Braintree and North Uttlesford are relatively isolated from other local centres within the district. However, given the proximity of the Easton Park Garden Community to Great Dunmow, development at this Garden Community has the potential to support the vitality of Great Dunmow as the district’s centre. Existing settlements are further supported through the spatial strategy by directing a level of growth to the Market Towns and larger villages; identified through the settlement hierarchy as sustainable locations for employment (Policy SP2). This will contribute positively towards strengthening the rural economy.
- 10.209 To maintain the long-term function of Saffron Walden as the main centre of the district and Great Dunmow as an important centre in the south, 11.83ha and 2.1ha of employment space will be delivered through Plan allocations respectively. Other sites will also be delivered in the longer term to ensure that the district has a plentiful and sustainable supply of employment land for the full plan period. Namely, the development of the Chesterford Research Park (Policy LtCHE1) will support the expansion of research and development space and associated activities and facilities.
- 10.210 There are a number of opportunities for expansion within existing employment sites within the district, either through intensification of uses or limited expansion of these sites. The re-development of the Ridgeons site at Ashdon Road, Saffron Walden is a primary example of further intensification on an existing employment site; contributing positively to the employment offer of the district.
- 10.211 London Stansted Airport will make a significant positive contribution to the delivery of the Spatial Strategy by facilitating economic growth and provision of jobs both on and off the airport. Notably, the North Stansted Employment Area within the London Stansted Airport Strategic Allocation (Policy SP11 London Stansted Airport) is a 55ha site allocated for B2 and B8 employment use. Policy SP11 recognises that the allocation “*serves the strategic role of London Stansted Airport and associated growth of business, industry and education, including aviation engineering, distribution and service sectors and the airport college which are important for Uttlesford, the sub-regional and national economy*”. This is expected to attract significant investment, allowing for new companies to locate at London Stansted Airport. This will support the growth of the LSCC.
- 10.212 A significant proportion of employment will be delivered through committed development, in addition to the level of employment proposed through the Plan site allocations discussed below. In this context, the latest available monitoring data (April 2016) identifies 49,000 sqm of employment floorspace available at sites where planning permission is already in place; many of which will deliver new employment premises to meet short and medium-term employment needs. These existing commitments will make a contribution towards meeting the overall level of employment need in the district over the Local Plan period.

- 10.213 In terms of the site allocations, Policy STA4 (Land at Alsa Street) is a 3ha extension of supporting businesses to the adjacent auction house. This site is north of the Stansted North site and will further support investment.
- 10.214 The employment offer of Saffron Walden will be further improved through Policy SAF12, which delivers 1ha of B1 use class. This site extends the existing petroleum storage depot. Land to the south of B1256 Little Canfield is allocated through Policy LtCAN1 for a new Council Depot comprising vehicle workshop, office building and storage and for employment purposes for Business uses (Use class B1). This will contribute positively towards securing local opportunities for residents to work; reducing employment overall in Type B Villages.

Appraisal of the Plan as a whole

- 10.215 All the Employment Policies (EMP1 - 4) seek to deal with relevant matters. Notably, Policy EMP1 (Employment Strategy) sets out the approach to employment delivery throughout the Plan period, supporting the allocation of new sites for employment to meet future needs and ensure sufficient flexibility.
- 10.216 Policy EMP2 (Existing and Proposed Employment Areas) seeks to retain and enhance the district's existing employment sites for B1, B2, B8 or complimentary sui generis uses. These sites make an important contribution to employment provision, drawing in a variety of local and national businesses and diversifying the local economy. 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.
- 10.217 Policy EM3 (Non-Estate Employment Uses) sets out the overall approach to the numerous employment uses in the district not on industrial estates; reflecting the predominantly rural and dispersed nature of the district.
- 10.218 The safeguarding and enhancement of rural businesses and jobs is supported through Policy EMP 4 (Rural Economy), where they are of an appropriate scale to their location, and protect environmental quality and character of the area. This seeks to ensure the longevity of the rural economy within the district.
- 10.219 Policy RET1 (Town and Local Centres) sets out the Town and Local Centre hierarchy and supports proposals for new retail floorspace where it is directly consistent with identified need. This will contribute positively towards maintaining and enhancing the vitality and viability of Town and Local Centres.
- 10.220 A range of other policies are of relevance to the achievement of economic objectives, including the policies dealing with 'Transport' and 'Infrastructure'. Policies INF1 (Infrastructure Delivery), TA1 (Accessible Development) and TA2 (Sustainable Transport) seek to improve levels of congestion, connectivity and accessibility around the district through enhancements to sustainable transport. This includes cycleways, footways and improved safety in development; take account of the needs of all users.
- 10.221 Policy INF4 (High Quality Communications Infrastructure and Superfast Broadband) requires that all new development proposals should demonstrate that they are served by up to date communications infrastructure. Additionally, the Council will support investment in high quality communications infrastructure and superfast broadband. This will contribute positively towards sustainable economic growth and attracting businesses to the area.
- 10.222 Overall, the Local Plan sets out a clear approach to supporting the growth and location of businesses in the district, safeguarding existing employment land and providing for a mix and range of employment sites. The GCs in particular will provide a wide range of local jobs within easy commuting distance from homes, supporting self-containment.
- 10.223 It is considered that the Plan presents a sufficient supply of employment land to meet local needs, including significant delivery at Great Chesterton and north of Stansted (provision of 80ha of employment space between the two sites). The permitted expansion of London Stansted Airport recognises the significant potential to attract additional investment into the

district. This reflects the Economic Development and Prosperity Strategy (2017), capitalising on existing economic sectors in addition to new.

- 10.224 To this end, additional housebuilding and related infrastructure development proposed through the Local Plan is expected to lead to significant long term positive effects on the economy; supporting the local employment base and creating jobs in new and growing sectors.

Commentary on cumulative effects

- 10.225 The cross-boundary importance of the LSCC Core Area is recognised, comprising the Local Planning Authorities (LPAs) of Broxbourne, East Hertfordshire, Epping Forest Harlow and Uttlesford. The interaction between new development proposed through the adopted or emerging Local Plans for the LPAs within the LSCC has the potential to lead to cumulative effects. These effects are likely to be significant and positive in terms of ensuring sustainable employment provision and economic growth within the district. The LSCC partnership is expected to deliver on economic growth and higher employment rates, providing locations for business and industry at a strategic level.
- 10.226 Part of the mechanism for delivering the LSCC Vision has been establishing the Objectively Assessed Economic Need (OAEN) of the FEMA. The delivery of the economic preferred growth scenario across the FEMA balances job growth with growth in homes. Cumulative effects in this respect will likely be significant, positive and long-term.
- 10.227 Cumulative effects are anticipated in relation to the delivery of Policy SP11 (London Stansted Airport). The wider strategic allocation serves the strategic role of London Stansted Airport and associated growth of business, industry and education, including aviation engineering, distribution and service sectors and the airport college which are important for Uttlesford, the sub-regional and national economy. Cumulative effects in this respect will likely be significant, positive and long-term.

Part 3: What are the next steps?

11. Next steps

Introduction (to Part 3)

11.1 The aim of this chapter is to explain next steps in the plan-making/ SA process.

Plan finalisation

11.2 The Council is preparing to submit the Local Plan to the Secretary of State for examination in public, in-line with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This Submission SA Report is being published on the Council's website to allow representations to be submitted. The submission of the Local Plan will occur during this representation period, any comments received on the SA Report will be submitted following the end of the consultation period.

11.3 At Examination a government appointed Planning Inspector will consider representations (in addition to the SA Report and other submitted evidence) before determining whether the plan is sound (or requires further modifications).

11.4 If found to be 'sound' the plan will be formally adopted by the Council. At the time of adoption an 'SA Statement' will be published that sets out (amongst other things) 'the measures decided concerning monitoring'.

Monitoring

11.5 At the current time, there is a need only to present 'measures envisaged concerning monitoring'. The Pre-submission Local Plan includes a range of proposed monitoring measures in Appendix 2. The table below lists a selection of the Council's proposed measures, as well as any wider monitoring measures, that are of particular importance given the findings of the appraisal.

Table 11.1: A selection of the Council's potential monitoring measures

SA objective	Proposed measure (given appraisal findings)
1: To conserve and enhance biodiversity (habitats, species and ecosystems) within the district	<ul style="list-style-type: none"> • Condition of Sites of Special Scientific Interest (SSSI). • Number of Local Wildlife Sites (LWS) under Positive Conservation Management.
2: To conserve and enhance water quality and resources and help achieve the objectives of the Water Framework Directive	<ul style="list-style-type: none"> • Number of planning applications granted contrary to Environment Agency advice.
3: To conserve and enhance the district's landscape character and townscapes	<ul style="list-style-type: none"> • Number of new dwellings permitted within Green Belt. • Number of new free-standing dwelling permitted within the Countryside Protection Zone. • Number of new dwellings permitted beyond development limits that do not meet policy criteria.
4: To conserve and enhance soil and contribute to the sustainable use of land	<ul style="list-style-type: none"> • Number of new dwellings on brownfield sites.
5: To maintain and enhance the district's cultural heritage assets and their settings	<ul style="list-style-type: none"> • Number of Buildings on the Heritage Risk Register.

SA objective	Proposed measure (given appraisal findings)
6: To reduce contributions to climatic change	<ul style="list-style-type: none"> • Number of planning applications granted contrary to Environment Agency advice. • Floorspace and percentage of commercial development built to at least BREEAM very good rating.
7: Reduce and control pollution	<ul style="list-style-type: none"> • Local Air Quality Updating and Screening Assessment report and Air Quality Progress Reports. • Number of dwellings built within poor air quality zones. • Quarterly Moving Annual Total produced by CAA.
8: To reduce the risk of flooding	<ul style="list-style-type: none"> • Number of planning applications granted contrary to Environment Agency advice.
9: To promote and encourage the use of sustainable methods of travel	<ul style="list-style-type: none"> • Amount and % of new residential development within market towns and key villages and garden communities. • Quarterly Moving Annual Total produced by CAA.
10: To ensure accessibility to services	<ul style="list-style-type: none"> • Amount and % of new residential development within market towns and key villages and garden communities. • Delivery of major infrastructure priorities identified to facilitate development against IDP timescale. • Net additional floorspace completed. • Number of A1 uses on Primary Street Frontages.
11: To improve the population's health and promote social inclusion	<ul style="list-style-type: none"> • Area of allotments provided and transferred to managing body. • Number of sports pitches provided and transferred to a managing body. • Amount of green space provided and transferred to a managing body. • Delivery of major infrastructure priorities identified to facilitate development against IDP timescale. • Number of changes of use of village shops and other community assets permitted.
12: To provide appropriate housing and accommodation to meet existing and future needs	<ul style="list-style-type: none"> • Housing Trajectory for 5 and 15-year period. • Net additional affordable dwellings completed per year. • Dwelling sizes (number of bedrooms) of completed developments of 6+ dwellings between 2011 – 2033 measured annually. • Completion of housing for people with specific accommodation needs.
13: To promote the efficient use of resources, including land and ensure the necessary infrastructure to support sustainable development	<ul style="list-style-type: none"> • Delivery of major infrastructure priorities identified to facilitate development against IDP timescale. • Net additional floorspace completed. • Number of A1 uses on Primary Street Frontages.
14: To improve the education and skills of the population	<ul style="list-style-type: none"> • Delivery of major infrastructure priorities identified to facilitate development against IDP timescale.
15: To ensure sustainable employment provision and economic growth	<ul style="list-style-type: none"> • Net additional employment floorspace completed. • Net additional jobs provided as reported in the Airport Employment Survey. • Number of changes of use of village shops and other community assets permitted.

Appendices

Appendix I: Regulatory requirements

As discussed in Chapter 1 above, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report; however, interpretation of Schedule 2 is not straightforward. **Table IA** links the structure of this report to an interpretation of Schedule 2 requirements, whilst **Table IB** explains this interpretation.

Table IA: Questions answered by the SA Report, in accordance with an interpretation of regulatory requirements

Questions answered		As per the regulations...the SA Report must include...	
Introduction	What's the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes 	
	What's the SA scope?	What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the sustainability 'baseline'?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the Plan 	
Part 2	What are the SA findings at this current stage?	<ul style="list-style-type: none"> The likely significant effects associated with the Submission Plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the Submission Plan 	
Part 3	What happens next?	<ul style="list-style-type: none"> A description of the monitoring measures envisaged 	

Table IB: Questions answered by the SA Report, in accordance with regulatory requirements

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
1. an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
2. the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance The relevant environmental protection objectives, established at international or national level	i.e. answer - <i>What's the 'context'?</i>
3. the environmental characteristics of areas likely to be significantly affected;		
4. any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;		
5. the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan' The environmental characteristics of areas likely to be significantly affected	i.e. answer - <i>What's the 'baseline'?</i>
6. the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance Key environmental problems / issues and objectives that should be a focus of appraisal	
7. the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
8. an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
9. a description of the measures envisaged concerning monitoring.	The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

Whilst Tables A and B signpost *broadly* how/where this report presents the information required of the SA Report by the Regulations, as a supplement it is also helpful to present a discussion of *more precisely* how/where regulatory requirements are met - see **Table IC**.

Table IC: ‘Checklist’ of how (throughout the SA process) and where (within this report) regulatory requirements have been, are and will be met.

Regulatory requirement	Discussion of how requirement is met
Schedule 2 of the regulations lists the information to be provided within the SA Report	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 2 (‘What’s the plan seeking to achieve’) presents this information. The relationship with other plans and programmes is also set out in Appendix II (Scoping Information).
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report published in 2015.
3. The environmental characteristics of areas likely to be significantly affected;	The outcome of scoping was an ‘SA Framework’, and this is presented within Chapter 3 (‘What’s the scope of the SA’).
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	More detailed messages from the Scoping Report - i.e. messages established through context and baseline review - are presented within Appendix II.
5. The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	<p>The Scoping Report (2015) presents a detailed context review, and explains how key messages from the context review (and baseline review) were then refined in order to establish an ‘SA framework’. A summary is provided in Appendix II of this SA Report.</p> <p>The context review informed the development of the SA framework and topics, presented in Chapter 3, which have been used to Taken together, which provide a methodological ‘framework’ for appraisal.</p> <p>With regards to explaining “<i>how... considerations have been taken into account</i>” -</p> <ul style="list-style-type: none"> • Chapters 5, 6, 7 and 8 explain how reasonable alternatives were established in 2015, 2017 and 2018 in-light of earlier consultation/SA. • Chapter 8 sets out the summary findings of the appraisal of the Garden Community options, Takeley growth options and spatial strategy options at this stage, with the detailed appraisal provided in Appendix V. • Chapter 8 explains the Council’s ‘reasons for supporting the preferred approach’, i.e. explains how/why the preferred approach is justified in-light of alternatives appraisal (and other factors). <p>Chapter 10 sets out the findings of the appraisal of the Submission Version Local Plan.</p>
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	<ul style="list-style-type: none"> • Chapter 8 sets out the summary findings of the appraisal of the reasonable alternatives for the Submission Version Local Plan (in relation to the Garden Community options, Takeley growth options and spatial strategy options at this stage), with the detailed appraisal provided in Appendix V. • Chapter 10 presents the Submission Local Plan appraisal. <p>As explained within the various methodology sections, as part of appraisal work, consideration has been given to the SA scope, and the need to consider the potential for various effect characteristics/dimensions.</p>
7. The measures envisaged to prevent, reduce and as	Where necessary, mitigation measures are identified

Regulatory requirement

Discussion of how requirement is met

<p>fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;</p>	<p>within the appraisal of alternatives (in Chapter 8 and Appendix V) and appraisal of the Local Plan (Chapter 10).</p>
<p>8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;</p>	<p>Chapters 5, 6, 7 and 8 deal with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues and options. Also, Chapter 8 explains the Council's 'reasons for selecting the preferred option' (in light of alternatives appraisal). Methodology is discussed at various places, ahead of presenting appraisal findings, and limitations/assumptions are also discussed as part of appraisal narratives.</p>
<p>9. Description of measures envisaged concerning monitoring in accordance with Art. 10;</p>	<p>Chapter 11 presents measures envisaged concerning monitoring.</p>
<p>10. A non-technical summary of the information provided under the above headings</p>	<p>The NTS is provided in a separate document.</p>

The SA Report must be published alongside the Draft Plan, in accordance with the following regulations

<p>authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)</p>	<p>An Interim SA Report was published alongside the Issues and Options document for consultation in 2012. An Interim SA Report was also published alongside the Regulation 18 Draft Local Plan for consultation in 2017. In 2018, SA Reports were published alongside the Regulation 19 Pre-submission Local Plan as well as the Addendum of Focused Changes. These reports set out the findings of the SA for the preferred approaches and alternatives at that time. At the current time, this SA Report is published alongside the Submission Local Plan so that representations might be made.</p>
--	--

The SA Report must be taken into account, alongside consultation responses, when finalising the plan.

<p>The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.</p>	<p>The Council has taken into account the SA Reports published in 2012, 2017 and 2018, alongside consultation responses received, when finalising the Submission Local Plan for publication. Appraisal findings presented within this current SA Report will inform a decision on whether or not to submit the plan, and then (on the assumption that the plan is submitted) will be taken into account when finalising the plan at Examination (i.e. taken into account by the Inspector, when considering the plan's soundness, and the need for any modifications).</p>
--	--

Appendix II: Scoping information

As discussed in Chapter 3 ('What's the scope of the SA?') the SA scope is primarily reflected in a list of objectives ('the SA framework'), which was established subsequent to a review of the sustainability 'context'/ 'baseline', analysis of key issues, and consultation. The detailed scoping information was presented in a Scoping Report sent to statutory consultees in July 2015. The comments received were presented in Section 2.4 of the revised Scoping Report published in September 2015.

The aim of this appendix is to present a summary of the scoping information and ensure that the information required under Schedule 2 of the SEA Regulations is provided.

Relationship with other plans and programmes

The following list provides a summary of the key plans and programmes that provide the policy context for the Uttlesford District Council Local Plan.

- National Planning Policy Framework (NPPF) (2018)
- National Planning Practice Guidance (NPPG)
- The Localism Act 2011
- 25 Year Environment Plan (2017)
- Biodiversity 2020 Strategy (2011)
- Natural Environment and Rural Communities Act 2006
- Countryside and Rights of Way Act 2000
- Planning and Compulsory Purchase Act 2004
- Climate Change Act 2008
- Energy Act 2008
- The Education (School Information) (England) (Amendments) Regulations, 2002
- Childcare Act, 2006
- Flood & Water Management Act 2010
- The National Flood and Coastal Erosion Risk Management Strategy for England (2011)
- UK Renewable Energy Roadmap (2011)
- The Heritage Statement (2017)
- Air Quality Plan for Nitrogen Dioxide (NO₂) in the UK (2017)
- Water for Life (2011)
- National Policy Statement for Waste Water (2012)
- Planning Policy for Traveller Sites (2012)
- Laying the Foundations: A Housing Strategy for England (2011)
- The Natural Choice: Securing the Value of Nature (2011)
- The National Adaptation Programme – Making the Country Resilient to a Changing Climate (2013)
- Essex and Southend Replacement Structure Plan – Saved Policy Direction (2001)
- Essex Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (2014)

- Looking Back, Moving Forward – Assessing the Housing Needs of Gypsies and Travellers in Essex (2006)
- Greater Essex Demographic Forecasts Phases 1 & 2 & 3 (2012)
- Essex Local Transport Plan (2011)
- 2011 Essex Biodiversity Action Plan
- Commissioning School Places in Essex 2014 – 2019
- Essex County Council Joint Municipal Waste Management Strategy 2007 – 2032
- River Basin Management Plan Thames River Basin District
- River Basin Management Plan Anglian River Basin District
- Essex Wildlife Trust Living Landscape Plans
- Essex Wildlife Trust Living Landscape Statements
- Essex Rural Strategy: 2020 Vision for Rural Essex (2010)
- ECC Parking Standards: Design and Good Practice (2009)
- The Essex Strategy 2008 – 2018
- Sustainable Drainage Systems Design and Adoption Guide (2012)
- Adopted Essex Minerals Local Plan (2014)
- MAG's Stansted – Sustainable Development Plan (2015)
- Uttlesford Futures Sustainable Community Strategy: A vision for our future 2018
- Uttlesford District Council Statement of Community Involvement (2015)
- Open Space, Sport Facility and Playing Pitch Strategy (2012)
- Uttlesford Cycling Strategy (2014)
- Uttlesford District Council Climate Local Strategy and Action Plan 2015 – 2018
- Uttlesford District Council Energy and Efficiency and Renewable Energy (2007)
- Employment Land Monitoring (2014)
- Infrastructure Development Plan (2014)
- Historic Environment Characterisation Project (2009)
- Strategic Housing Market Assessment for London Commuter Belt (East)/ M11 Sub-Region (2008)
- Affordable Housing Viability Assessment for London Commuter Belt (East)/ M11 Sub-Region (2010)
- Strategic Housing Land Availability Assessment (2013)
- Housing Trajectory and Five-Year Land Supply (2015)
- Employer and Business Survey (2009)
- Employment Land Review (2011)
- District Retail Study (2014)
- Comparative Transport Analysis – A Transport Analysis of potential Strategic development locations in Uttlesford (2010)
- Uttlesford District Historic Environment Characterisation Project (2009)
- Historic Settlement Character Assessment (2007)
- Town and Village Profiles (2012)
- Landscape Character Assessment (2006)

- Local Wildlife Site Review (2007)
- Habitats Regulation Assessment of Pre-Submission Draft Local Plan (2014)
- Renewable Energy Study of the District (2008)
- Uttlesford Strategic Flood Risk Assessment (2008)
- Water Cycle Study (2010 & 2012)
- Green Belt Boundary Scoping Report (2011)
- Affordable Housing Viability Assessment (2010 & 2012)
- Demographic Forecasts Phases 1 – 6 (2015)
- Protected Lanes Assessment (2012)
- Developer Contribution Guidance Viability Testing (2014)
- Objectively Assessed Housing Need (2013)
- Housing Supply Windfall Allowance (2014)
- Strategic Housing Market Assessment (2015)
- Great Chesterford Cycle Route Feasibility Study (2014)
- Local Plan highway Impact Assessment (2014)
- Sites Viability Assessment (2014)
- District Conservation Area Appraisals and Management Plans
- Parish Plans and Town/ Village Design Statements

Baseline information (environmental characteristics, problems and evolution without the plan)

Overview

Biodiversity and Nature Conservation

The Essex Biodiversity Action Plan (EBAP) highlights 25 species and 10 habitat action plans covering Essex (Essex Biodiversity Action Plan [EBAP] 2011).

There are no international or European designated sites within Uttlesford. Nationally designated sites include 2 National Nature Reserves (NNRs) and 12 Sites of Special Scientific Interest (SSSIs). There are also 281 locally important nature conservation areas which are designated as Local Wildlife Sites (LoWSs) (Natural England [July 2015]).

There is a Public Service Agreement (PSA) target of at least 95% of all nationally important wildlife sites being brought into favourable condition. 8 of the 12 sites in Uttlesford are meeting this target. Those not are Ashdon Meadows, Debden Waters, Hall's Quarry and High Wood, Dunmow. The majority of Hall's Quarry and Debden Waters SSSI areas are in favourable conditions, however they are not meeting the PSA target because of unfavourable conditions in other sections. 35.03% Hall's Quarry and 39.87% of Debden Waters SSSI are in an unfavourable condition and declining (Natural England [July 2015]).

In addition to designated sites, consideration should also be given to non-designated value in regards to ecology on a site-by-site basis in order to protect and enhance species and habitats, including those that are protected. This could include Greenfield sites and areas of habitat considered to enrich appreciably the habitat resource within the context of local areas, such as species-rich hedgerows, municipal parklands or individual veteran trees.

Water Environment (including flooding)

None of the rivers in the Roding, Beam and Ingreborne catchment currently achieve good or better ecological or biological status/potential. A total of 67% are classified as having poor biological status, and 11 % of the assessed river water bodies have bad status. By 2015 the status for at least one element was expected to have improved by 31% which is second to the Upper Lee catchment, also in the Thames region, where 44% should improve over the same timescale. 16% of rivers in this catchment currently achieve good or better ecological status/potential and 10% have good or high biological status now, with 62% at poor biological status, but none classed as bad status. The Cam and Ely Ouse and Combined Essex catchments achieve higher percentages of water bodies with at least good biological status at over 27% and 33% respectively but Combined Essex catchment reported only 7% of water bodies achieving good ecological status/potential (River Basin Management Plan Anglian River Basin District, December [2009] & River Basin Management Plan Thames River Basin District, December [2009]).

Of all the river courses in the District, the Cam and Ely Ouse displayed the highest percentage assessed at good chemical status and good overall status including chemical and ecological at 94% and 17% respectively. However, the Upper Lee catchment was predicted to register the highest % improvement for one or more element in the river of 44% by 2015 (River Basin Management Plan Anglian River Basin District, December [2009] & River Basin Management Plan Thames River Basin District, December [2009]).

Surface water flooding risk in the District was highlighted through the modelling of surface water in Saffron Walden, Great Dunmow and Stansted Mountfitchet, which identified drainage paths and potential areas that may be susceptible to surface water ponding. In numerous locations surface water reaches depths of more than 60 cm (Uttlesford Strategic Flood Risk Assessment [2008]).

A 2008 SFRA was undertaken to accompany the District's Local Plan and this is being updated to accompany the new Local Plan. The SFRA is a planning tool that enables the council to select and develop sustainable site allocations away from vulnerable flood risk areas. The SFRA will assist the council to make the spatial planning decisions required to inform the Local Plan and contained recommendations. In regards to land use planning, water quality raises a range of challenges from development, including point source pollution from required sewage treatment, water abstraction to supply people and industry and diffuse pollution from urban sources (Strategic Flood Risk Assessment [2008]).

Landscapes

The Landscape Character Assessment for Uttlesford District identified 20 separate landscape character area types (Uttlesford Landscape Character Assessment [2006]).

There is a significant proportion of ancient woodland in the District. Hatfield Forest is an important survival of a medieval forest, comprising a mixture of wood pasture with pollards, coppice woods, timber trees, a warren, lodge and lake (Uttlesford District Council [2015]).

Protected lanes have significant historic and landscape values and because of their age they often have significant biological value too. There are 168 grade one and two protected lanes within the District (Uttlesford Protected Lanes Assessment [2012]).

More than 100 verges have been designated as being Special Roadside Verges in the District. They are considered important for their ecological value as they contain rare or uncommon fauna and act as corridors interlinking fragmented or isolated habitats (Uttlesford District Council [2015]).

Minerals

There are localised deposits of silica sand, chalk, brickearth and brick clay in Essex. Marine dredging takes place in the extraction regions of the Thames Estuary and the East Coast, whilst aggregate is landed at marine wharves located in east London, north Kent, Thurrock, and Suffolk. Essex has no landing wharves of its own. There are no hard rock deposits in the County so this material must be imported into Essex. This currently occurs via rail to the existing rail depots at Harlow and Chelmsford. (Essex County Council Adopted Minerals Plan [2014]).

The majority of the sand and gravel produced in Essex (about 78%) is used within the County itself. This position looks unlikely to change over the long-term. Consequently the main factor influencing production of sand and gravel in the future will be the need to meet the minerals demand for the whole of Essex created by major development and new infrastructure projects within Essex itself (Essex County Council Adopted Minerals Plan [2014]).

Extensive chalk resources are present under the surface but outcrop only in the North West, particularly in Uttlesford District Currently. They are extracted at only one site in the form of white chalk at Newport Quarry, used mostly in agricultural practices, although small quantities are used by the pharmaceutical industry. In Essex they are not associated with a land bank as it is extracted as an industrial mineral rather than as an aggregate (Essex County Council Adopted Minerals Plan [2014]).

Waste

The majority of local authority collected household waste is sent for recycling, composting or reuse. Despite this, no non-household local authority collected waste is recycled, composted or re-used (Waste Data Flow, Department for Environment, Food and Rural Affairs [Defra] 2013).

Households within Uttlesford District Council produce 136.89kg per household less waste than the county average, and a larger percentage of this waste is recycled re-used or composted (55.53%), than the Essex average (Waste Data Flow, Department for Environment, Food and Rural Affairs [Defra] 2013).

Six transfer facilities have been granted planning permission within Essex and Southend, to support a materials recovery facility, in Basildon. These will, once constructed, accept waste from the Waste Collection Authority vehicles directly from kerbside collection. Here waste will be bulked up, ready for transportation to Basildon. Uttlesford waste is scheduled to be bulked up at Great Dunmow (Essex County Council Replacement Waste Local Plan [Revised Preferred Approach, 2015]).

In Essex, there are currently no active waste fed AD plants. There is one AD facility near Thaxted, commissioned in 2012, dealing solely with grass silage, sugar beet, maize and farm residues with a total capacity of 20,000 tonnes per annum. The output is 1,067kWe as combined heat and power. This facility is fed with 'energy crops' and does not accept non-hazardous food/green waste from homes or industry and was therefore considered by Uttlesford District Council (ref UTT/1709/10/FUL) rather than the Waste Planning Authority. As such, it is likely that the Waste and Local Planning Authorities will receive further applications for waste, 'energy crop' fed AD facilities respectively as the technology advances, and barriers are removed in line with the AD strategy and action plan (Essex County Council Replacement Waste Local Plan [Revised Preferred Approach, 2015]).

The Replacement Waste Local Plan (Revised Preferred Options) Document 2015 allocates the following sites within Uttlesford: 2 inert waste recycling facilities (Little Bullocks and Elsenham); 1 site for Stable non-reactive hazardous waste landfill (Little Bullocks); 1 site for inert landfill (Little Bullocks); 1 site for a waste transfer station (Great Dunmow), (Essex County Council Replacement Waste Local Plan [Revised Preferred Approach, 2015]).

Soil

There is no Grade 1 Agricultural Land in the District. The majority of the District falls within Grade 2 Agricultural Land (classed as very good), with the rest forming Grade 3 Agricultural Land (good to moderate) (Agricultural Land Classification Maps [2010]).

Cultural Heritage

The majority of archaeological sites and deposits in Uttlesford District remain buried, hidden and thus preserved. However, the known archaeological resource in the District is very varied and highly significant. There are approximately 4,064 in records of archaeological sites and finds recorded on the Essex Historic Environment Record (EHER) for Uttlesford District as of December 2010. (Essex Historic Environment Record [2012]).

There are 3,731 designated listed buildings within the District and the majority of them are grade II listed. This means they are nationally important and of special interest. 1.8% of all the listed buildings are considered to be of exceptional interest and internationally important (grade I) and 4.6% are

classed as particularly important buildings of more than special interest (grade II*) (Essex Historic Environment Record [2012]).

There are 73 Scheduled Monuments within the District which represents 24.5% of all Scheduled Monuments within Essex. They range from prehistoric burial mounds to unusual examples of World War II defensive structures and have been designated due to their national importance. Audley End located west of Saffron Walden, is designated as a Scheduled Monument, as well as a landscape park and historic house (Historic England [2015]).

There are seven registered parks and gardens within Uttlesford District which have each been designated by English Heritage as being “a park or garden of special historic interest” and 36 conservation areas within Uttlesford District which are defined as historical settlements and buildings having ‘special architectural or historical interest, the character of which is desirable to preserve or enhance’ (Historic England [2015]).

Climate and Energy

More than half the District’s 2,808.9GWh energy consumption is from petroleum products which are a result of transport, domestic and commercial industries (66.20%). In contrast only 15.9GWh of energy consumed is from bioenergy and waste products. This is the second highest percentage of total energy consumption from renewable sources (0.57%) compared with neighbouring areas, second to Maldon (0.92%) (DECC, updated 2014)

The transport industry is responsible for the majority of CO₂ emissions within Uttlesford with 38.3%, followed by domestic consumption (31.1%) and industry and commercial consumption (30.7%). Uttlesford is ranked as the third place district in Essex for per capita reductions in CO₂ emissions with 21.3%, which is higher than the county percentage of 17.6%. Harlow and Maldon were ranked higher than Uttlesford with 25.0% and 21.4% respectively (DECC, updated 2013)

Mean summer precipitation has a 67% likelihood of decreasing by up to 10% across the whole region by 2020 and by 2050 the south of the East of England will see decreases by up to 20%. By 2050 much of the region is expected to see a mean winter precipitation increase of between 10% and 20% (Met Office UKCP [2014]).

Up to March 2011 Uttlesford District had issued 125 Code for Sustainable Homes certificates, 64 at the design stage and 61 post construction. This total number is below the Essex average of 156 certificates issued (DCLG [2011]).

Air and Noise

The main air quality issues within the District following the first round of air quality assessments in 1998 to 1999 were found to be emissions of NO₂ and PM₁₀ from vehicles on the M11 and A120. However, no air quality management areas (AQMAs) have been declared in Uttlesford for these as national air quality objectives were not predicted to be exceeded. Further assessments found 3 junctions in Saffron Walden showing NO₂ levels exceeding the objectives which have been declared AQMAs and 2 other sites in the District have since reported exceedances in NO₂ levels (Uttlesford District Council [2015]).

Over the past 6 years the data for Uttlesford shows no exceedances of the annual mean Nitrogen Dioxide objective at the automatic monitoring sites, and in the years when the hourly mean was exceeded, the number recorded was within the number acceptable to meet the 1 hour standard. The number of exceedances of the hourly mean were recorded as - 2008 = 2 (Saffron Walden), 2009 = 0, 2010 = 13 (Saffron Walden), 2011 = 1 (Stansted), 2012 = 0, 2013 = 0, and 2014 = 0. It should be noted that Defra have stated that 2010 was an unusually high year across the whole of the UK for NO₂ nationally for climate reasons Uttlesford District Council (2015).

Regarding diffusion tube monitoring data, of the 26 monitoring sites in Uttlesford, no concentrations exceeded the objectives in 2014 (Uttlesford District Council [2015]).

Central Saffron Walden continues to be designated as an Air Quality Management Area (AQMA). Ambient or environmental noise is defined as noise which is either unwanted or harmful. It is created by human activities and includes noise emitted by transport including road traffic and air traffic, as well

as from sites of industrial activity. Britain's third busiest international airport, Stansted Airport is located within the District and a major motorway, the M11 traverses through it down the eastern side. Both these forms of transportation generate ambient noise which can impact people living or working nearby (Uttlesford District Council [2015]).

There are no dwellings situated in close enough proximity of Stansted Airport that experience noise levels exceeding 75dB at any time of day but under 100 dwellings do experience noise that exceeds 70dB during the day, evening and night. Noise level produced on the M11 exceeds 75dB across the day, evening and night at the point of source and dissipates across a large area surrounding the road. The B1256 also creates ambient noise above 75dB but noise levels dissipate across a much smaller distance. The new A120 has been constructed which is likely to have increased noise implications, despite alleviating noise levels on the B1256. (Taken from Stansted Airport Environmental Noise Directive Noise Action Plan 2010-2015 Draft for Consultation [June 2009]).

Transport

90.4% of households in Uttlesford own at least one vehicle, a far higher percentage than for the East of England (82.3%) and for England and Wales (73.9%). The highest percentage of residents own 2 cars or vans whereas in both the East of England and England and Wales the majority of the population own 1 car or van (ONS [2011]).

Uttlesford District has a higher proportion of residents driving to work by either car or van (46.34%) when compared to regional and national levels as well as a larger proportion of residents working from home (6.43%). This could be related to the District being mainly rural. There is also a higher usage of trains as a mode of transport within the District compared to the national trend but fewer residents cycle or travel by underground or on a bus, minibuss or coach. The proportion of residents who walk to work is comparatively similar to the regional and national levels. Whilst it is considered that the rural nature of the district may have a key role to play in encouraging this, it is important that with the evolution of the plan further consideration is given to how future growth may be delivered to facilitate uplift in sustainable travel. Uttlesford SEA Baseline Information Profile Report (November 2010) (Census data 2011 from ONS [updated Jan 2013]).

The work destination attracting the highest proportion of Uttlesford residents was the City of London (10.9%). The next most popular destinations for employment were the neighbouring areas of Cambridge with 991 commuters (5.5%) and Harlow with 410 (2.3%) (NOMIS [2011]).

Accessibility is a general issue within Uttlesford District, with only just over one third of residents being within 15 minutes of an employment site or retail centre and 50% being within 15 minutes of a GP. Over four fifths of the population of Uttlesford District live within 30 minutes of a primary school. The proportion of residents with access to a secondary school within 30 minutes walking or public transport is significantly smaller at 60% (Essex County Council [2011]).

Population and Society

Uttlesford has experienced a faster rate of population growth (14.81%) when compared with county (6.18%), regional (8.11%) and national level (6.99%) (ONS mid-year population [2014]).

At 77.1% a higher proportion of pupils within Uttlesford attained five or more A*-C grades at key stage 4 (KS4) than the county, regional and national equivalent. 64.3% of pupils who gained five or more A*-C grades did so in English and Mathematics which is considerably more than the national proportion of 53.4%. The proportion of pupils attaining five or more A*-G grades was also above the national figure and only 0.4% of all pupils in the District didn't receive any passes at KS4 (Department for Education [2014]).

The population of Uttlesford District has in general more qualifications than the overall sub-national and national populations. 93.4% of the working age population of Uttlesford District which accounts for 46,700 people are qualified to at least level 1 or higher compared to 85.0% across Great Britain. Level 1 represents foundation GNVQ, NVQ 1 or up to 5 GCSEs at grades A*-C. The most significant difference is that Uttlesford has comparatively higher proportions of the population qualified at Level 3 and Level 4 and above. With 59.3% of the population having attained at least 2 or more A levels, advanced GNVQ, NVQ 3 or equivalent (level 3) and 35.6% achieving a higher national diploma, degree and higher degree level or equivalent (level 4). Uttlesford has a significantly higher skilled

workforce in comparison to the county and a slightly higher proportion than the regional level (NOMIS [2014]).

School age population numbers are projected to grow relatively slowly and school capacity within Uttlesford is expected to be sufficient to accommodate children in the District. Primary schools are predicted to have a surplus of 288 places for the 2018/19 academic year. Secondary schools are predicted to have a surplus of 415 for the same time period. However, when adjustments are made to the pupil forecast figures to take account of the numbers of primary and secondary pupils it is anticipated will be produced by new housing that is likely to be built by 2019 the forecasts show a deficit of some 400 places for primary schools and only a very small surplus of secondary school places (Commissioning School Places in Essex 2014-2019).

As a district, Uttlesford at present has very low levels of social deprivation when compared to neighbouring localities and other areas in Essex. Overall, Uttlesford district is ranked among the best 40% of local authority areas for its 'Indices of Multiple Deprivation' (IMD) score. This score is based on a number of indicators including barriers to social housing, education and average income. Although Uttlesford district is considered amongst the most affluent areas in the country, at a sub-locality level, discrepancies exist between areas. Some of the more rural areas experience higher levels of deprivation, particularly when viewed in terms of barriers to housing and poor access to services (Uttlesford Community Safety Strategic Assessment [2014]).

Housing

Since 2001 4,887 new dwellings have been completed, falling short of the requirement for housing set out in the SHLAA (DCLG [May 2013] and Uttlesford AMR [2013]).

There are 34,310 dwellings within Uttlesford District, 86.7% of which are privately owned (DCLG Table 100 Dwelling Stock [April 2014]).

Over the period 2007-2021, there is a need for 4,200 (52%) units of market housing, 2,600 (32%) units of intermediate affordable housing and 1,300 (16%) units of social rented housing in the District (this data is derived from the most recent Strategic Housing Market Assessment undertaken in 2008 and it is acknowledged that a forthcoming SHMA will offer more up to date information on the District's mix of housing requirement) (London Commuter Belt [East]/M11 Sub-Region SHMA [2008]).

2012/13 registered an increase in homeless acceptances to 43, aligning with national trends. There is also a demand for more Gypsy and Traveller sites in Uttlesford, totalling 26 additional sites by 2033 (DCLG [2013] and Essex GTAA [2014]).

Health

Life expectancy of residents within Uttlesford District is higher than the regional and national averages with men living for an average of 81.8 years and women on average living 85.1 years. In general, life expectancy is increasing within the District and nationwide. The implications of this will mean that as people live longer there will be increased pressure on services for the elderly (DCLG [2014]).

The prevalence of child obesity within the District is 5.4% which is lower than the county average of 8.1% and considerably below the national average of 9.4%. Adult obesity is 18.2% within the District which is considerably below both the county average of 24.5% and the national average of 23.0% (Active People Survey, Public Health England [2012]).

The proportion of adults participating in 30 minutes, moderate intensity sport has decreased in the most recent survey at the local, sub-national and national levels. In the District 42.0% of those in the survey were active in sport between October 2013 and October 2014 (Sport England Active People Survey 6, 7 and 8 [2013/14]).

Accessible Natural Greenspace Standard (ANGSt) created by Natural England sets out the minimum amount of accessible natural greenspace that any household should be within reach of. As much as 54% of households within Uttlesford do not have any access to natural greenspace. The District covers around 64,000ha of land but only 894ha of it is considered to be accessible natural greenspace (Analysis of Accessible Natural Greenspace Provision for Essex [2009]).

Economy and Employment

The district has the highest rate of economic activity at 74.4% compared to the county, region and country. Job density in Uttlesford (0.84) is higher than across the county (0.74), region (0.78) and nation (0.80) (NOMIS Labour Supply [April 2014 - March 2015]).

Uttlesford District is predominantly rural in nature and as such a significant proportion of businesses are based within rural locations with only 15% defined as being urban based (ONS [2011]).

81.7% of the working population in Uttlesford District are in employment which is higher than sub-national and national employment levels. The proportion of the District's working population who are economically active but unemployed is 3.0% which is below sub-national and national unemployment figures (NOMIS [April 2014 – March 2015]).

The District's Employment Land Review (ELR) expected to impact on employment land by identifying Stansted Airport as a prospective opportunity for growth despite BAA having withdrawn its planning application for a second runway (UDC Employment Land Review [2011]). Since this, the ownership of the airport has changed from BAA to MAG (2015). There is currently a short fall in tertiary sector employment at Stansted. It is important that consideration be given to the location of future residential growth to ensure that local people can benefit from employment opportunities available at the airport.

Stansted Airport employed 10,860 people in 2009 (UDC Employment Land Review [2011]).

Key sustainability issues and likely evolution without the plan

Key issues	Description / supporting evidence	Likely evolution in absence of Plan	SA objective
Biodiversity	From the Essex Biodiversity Action Plan (EBAP) there are 25 species and 10 habitat action plans covering Essex.	Although biodiversity and ecological designations are protected internationally and nationally, allocating sites and devising policy criteria in a locally relevant plan-led system enables specialist input on a site-by-site basis and the best outcomes in light of all alternatives. Without such a plan-led approach, sites may be developed without relevant policy criteria which could have cumulative negative impacts on habitats and designations.	1) To conserve and enhance biodiversity (habitats, species and ecosystems) within the District
Designated sites	There are no international or European designated sites within Uttlesford. Nationally designated sites include 2 National Nature Reserves (NNRs) and 12 Sites of Special Scientific Interest (SSSIs). There are also 281 locally important nature conservation areas which are designated as Local Wildlife Sites (LoWSs). There is a Public Service Agreement (PSA) target of at least 95% of all nationally important wildlife sites being brought into favourable condition. 8 of the 12 sites in Uttlesford are meeting this target. Those not are Ashdon Meadows, Debden Waters, Hall's Quarry and High Wood, Dunmow. The majority of Hall's Quarry and Debden Waters SSSI areas are in favourable conditions, however they are not meeting the PSA target because of unfavourable conditions in other sections. 35.03% Hall's Quarry and 39.87% of Debden Waters SSSI are in an unfavourable condition and declining.		
Water environment	Of all the river courses in the District, the Cam and Ely Ouse displayed the highest percentage assessed at good chemical status and good overall status including chemical and ecological at 94% and 17% respectively. However,	Without the Plan's policy direction, it is possible that permissions are granted without suitable conditions. Water quality issues such as these are often tackled	2) To conserve and enhance water quality and resources and help to achieve the objectives of the

Key issues	Description / supporting evidence	Likely evolution in absence of Plan	SA objective
	<p>the Upper Lee catchment was predicted to register the highest % improvement for one or more element in the river of 44% by 2015.</p> <p>None of the rivers in the Roding, Beam and Ingreborne catchment currently achieve good or better ecological or biological status/potential now. A total of 67% are classified as having poor biological status, and 11 % of the assessed river water bodies have bad status. By 2015 the status for at least one element was expected to have improved by 31% which is second to the Upper Lee catchment, also in the Thames region, where 44% should improve over the same timescale. 16% of rivers in this catchment currently achieve good or better ecological status/potential and 10% have good or high biological status now, with 62% at poor biological status, but none classed as bad status. The Cam and Ely Ouse and Combined Essex catchments achieve higher percentages of water bodies with at least good biological status at over 27% and 33% respectively but Combined Essex catchment reported only 7% of water bodies achieving good ecological status/potential.</p>	through initiatives on sustainable drainage systems.	Water Framework Directive
Landscape features	<p>The Landscape Character Assessment for Uttlesford District identified 20 separate landscape character area types. With the exception of one they were all identified as being between moderate to highly sensitive of change.</p> <p>There is a significant proportion of ancient woodland in the District. Hatfield Forest is an important survival of a medieval forest, comprising a mixture of wood pasture with pollards, coppice woods, timber trees, a warren, lodge and lake.</p>	<p>Allocating sites and devising policy criteria in a locally relevant plan-led system enables input by landscape specialists on a site-by-site basis and the best outcomes in light of all alternatives. Without such a plan-led approach, sites may be developed without relevant policy criteria which could have cumulative negative impacts on landscapes.</p>	3) To conserve and enhance the District's landscape character and townscapes
Minerals	<p>The majority of the sand and gravel produced in Essex (about 78%) is used within the County itself. This position looks unlikely to change over the long-term. Consequently the main factor influencing production of sand and gravel in the future will be the need to meet the minerals demand for the whole of Essex created by major development and new infrastructure projects within Essex itself.</p> <p>Extensive chalk resources are present under the surface but outcrop only in the North West, particularly in Uttlesford District Currently. They are extracted at only one site in the form of white chalk at Newport Quarry, used mostly in agricultural practices, although small quantities are used by the pharmaceutical industry. In Essex they</p>	<p>Allocating sites and devising policy criteria in a locally relevant plan-led system enables mineral deposits to be specifically safeguarded in line with Essex County Council input as the relevant Minerals Planning Authority. The absence of a plan could see a number of a planning applications come forward that are not aware of designated and safeguarded mineral extraction sites and their protection. Local Planning Authorities are required to map such sites within their Local Plan for this purpose.</p>	

Key issues	Description / supporting evidence	Likely evolution in absence of Plan	SA objective
	are not associated with a land bank as it is extracted as an industrial mineral rather than as an aggregate.		
Soil	The majority of the District contains Grade 2 Agricultural Land (Agricultural Land Classification) which is described as Very Good. The remainder of the District is largely Grade 3 (Good to Moderate) aside from those areas that are primarily in non-agricultural use or urban use. There is no Grade 1 Agricultural Land (Excellent) in the District.	Without a plan-led system, applications could come forward and be granted that do not consider the best and most versatile agricultural land in the District. Although not a significant barrier to development, the plan has the potential to direct development, through allocations, to land that is of a worse quality in the first instance.	4) To conserve and enhance soil and contribute to the sustainable use of land
Cultural heritage	<p>The majority of archaeological sites and deposits in Uttlesford District remain buried, hidden and thus preserved. However, the known archaeological resource in the District is very varied and highly significant. There are approximately 4,064 in records of archaeological sites and finds recorded on the Essex Historic Environment Record (EHER) for Uttlesford District as of December 2010.</p> <p>There are 3,731 designated listed buildings within the District and the majority of them are grade II listed. This means they are nationally important and of special interest. 1.8% of all the listed buildings are considered to be of exceptional interest and internationally important (grade I) and 4.6% are classed as particularly important buildings of more than special interest (grade II*).</p> <p>There are 73 Scheduled Monuments within the District which represents 24.5% of all Scheduled Monuments within Essex. They range from prehistoric burial mounds to unusual examples of World War II defensive structures and have been designated due to their national importance. Audley End located west of Saffron Walden, is designated as a Scheduled Monument, as well as a landscape park and historic house.</p> <p>There are seven registered parks and gardens within Uttlesford District which have each been designated by English Heritage as being “a park or garden of special historic interest” and 36 conservation areas within Uttlesford District which are defined as historical settlements and buildings having ‘special architectural or historical interest, the character of which is desirable to preserve or enhance’.</p>	Although heritage and historic designations are protected nationally, allocating sites and devising policy criteria in a locally relevant plan-led system enables input by historic environment specialists on a site-by-site basis and the best outcomes in light of all alternatives. An absence of relevant policy criteria within a Local Plan may see applications come forward for development that conflict with the significance of such assets and their settings.	5) To maintain and enhance the district’s cultural heritage assets and their settings
Energy consumption	More than half the District’s 2,808.9GWh energy consumption is from petroleum products which are a	The Plan has the scope to allocate sites that are located in close proximity to	6) To reduce contributions to

Key issues	Description / supporting evidence	Likely evolution in absence of Plan	SA objective
	<p>result of transport, domestic and commercial industries (66.20%). In contrast only 15.9GWh of energy consumed is from bioenergy and waste products.</p> <p>This is the second highest percentage of total energy consumption from renewable sources (0.57%) compared with neighbouring areas, second to Maldon (0.92%).</p>	<p>sustainable transportation means and also promote their inclusion as part of site policy. An absence of a plan-led approach may see development arise that does not factor in such requirements, as well as the potential for renewable energy means and energy efficiency measures.</p>	<p>climatic change</p>
Climate change	<p>Mean summer precipitation has a 67% likelihood of decreasing by up to 10% across the whole region by 2020 and by 2050 the south of the East of England will see decreases by up to 20%.</p> <p>By 2050 much of the region is expected to see a mean winter precipitation increase of between 10% and 20%.</p>	<p>An absence of a plan-led approach to development needs could see a larger amount of sites not factoring in the cumulative impacts of water availability and infrastructure, as well as sustainable drainage systems.</p>	
Carbon Dioxide emissions	<p>The transport industry is responsible for the majority of CO2 emissions within Uttlesford with 38.3%, followed by domestic consumption (31.1%) and industry and commercial consumption (30.7%).</p> <p>Uttlesford is ranked as the third place district in Essex for per capita reductions in CO2 emissions with 21.3%, which is higher than the county percentage of 17.6%. Harlow and Maldon were ranked higher than Uttlesford with 25.0% and 21.4% respectively.</p>	<p>The Plan has the scope to allocate sites that are located in close proximity to sustainable transportation means and also promote their inclusion as part of site policy. An absence of a plan-led approach may see development arise that does not factor in such requirements, as well as the potential for renewable energy means and energy efficiency measures. An absence of the Plan could see less strategic commitment to minimise carbon emissions which would have increased effects on pollution output.</p>	<p>7) Reduce and control pollution</p>
Fluvial flooding	<p>A 2008 SFRA was undertaken to accompany the District's Local Plan. The SFRA is a planning tool that enables the council to select and develop sustainable site allocations away from vulnerable flood risk areas. The SFRA will assist the council to make the spatial planning decisions required to inform the Local Plan and contained recommendations</p>	<p>Site selection criteria, as well as a Flood Risk Assessment, are used to identify whether broad potential future locations for development represent the most appropriate choices in terms of flood risk. Without the Plan, the level of detail used to inform decisions of a strategic nature may not be as robust, especially regarding cumulative impacts. In addition, policy content can be used to set conditions on developments, or determine their refusal in areas of flood risk.</p>	<p>8) To reduce the risk of flooding</p>
Surface water flooding	<p>Surface water flooding risk in the District was highlighted through the modelling of surface water in Saffron Walden, Great Dunmow and Stansted Mountfitchet, which identified drainage paths and potential areas that may be susceptible to surface water ponding. In numerous locations surface water reaches depths of more than 60 cm.</p>		
Transport	<p>90.4% of households in Uttlesford own at least one vehicle, a far higher percentage than for the East of England (82.3%) and for England and Wales (73.9%). The highest percentage of</p>	<p>The Plan should seek the correct allocations to reduce emissions resulting from commuting miles whilst also</p>	<p>9) To promote and encourage the use of sustainable methods of travel</p>

Key issues	Description / supporting evidence	Likely evolution in absence of Plan	SA objective
	<p>residents own 2 cars or vans whereas in both the East of England and England and Wales the majority of the population owned 1 car or van.</p> <p>Uttlesford District has a higher proportion of residents driving to work by either car or van (46.34%) when compared to regional and national levels as well as a larger proportion of residents working from home (6.43%). This could be related to the District being mainly rural. There is also a higher usage of trains as a mode of transport within the District compared to the national trend but fewer residents' cycle or travel by underground or on a bus, minibus or coach. The proportion of residents who walk to work is comparatively similar to the regional and national levels. Whilst it is considered that the rural nature of the district may have a key role to play in encouraging this, it is important that with the evolution of the plan further consideration is given to how future growth may be delivered to facilitate uplift in sustainable travel.</p> <p>The work destination attracting the highest proportion of Uttlesford residents was the City of London (10.9%). The next most popular destinations for employment were the neighbouring areas of Cambridge with 991 commuters (5.5%) and Harlow with 410 (2.3%).</p>	<p>exploring the validity of sustainable transportation; neither of which could be managed on a strategic scale without the Plan.</p>	
Accessibility	<p>Accessibility is a general issue within Uttlesford District, with only just over one third of residents being within 15 minutes of an employment site or retail centre.</p> <p>Only 50% of residents are within 15 minutes of a GP.</p> <p>Over four fifths of the population of Uttlesford District live within 30 minutes of a primary school.</p> <p>The proportion of residents with access to a secondary school within 30 minutes walking or public transport is significantly smaller at 60%.</p>	<p>If the plan did not factor in accessibility as a criterion for sustainable development, large proportions of the population would be without access to vital services such as GPs. This could result in serious adverse impacts on residents of Uttlesford. With the plan, it is simple to include considerations for accessibility to services from the onset and attain a more holistic approach.</p>	10) To ensure accessibility to services
Life expectancy	<p>Life expectancy of residents within Uttlesford District is higher than the regional and national averages with men living for an average of 81.8 years and women on average living 85.1 years. In general, life expectancy is increasing within the District and nationwide.</p>	<p>The implications of increased life expectancy will mean increased pressure on services for the elderly, especially regarding care and suitable health services. These are key considerations in a plan-led system; the absence of which could see a less joined up approach between development across the District and sufficient care and health service</p>	11) To improve the population's health and promote social inclusion

Key issues	Description / supporting evidence	Likely evolution in absence of Plan	SA objective
Obesity	The prevalence of child obesity within the District is 5.4% which is lower than the county average of 8.1% and considerably below the national average of 9.4%. Adult obesity is 18.2% within the District which is considerably below both the county average of 24.5% and the national average of 23.0%.	Obesity rates in adults will continue to be higher than rates in children, increasing the risk of certain diseases and reducing life expectancy and social wellbeing. The absence of a plan-led approach may see cumulative developments arise that do factor in the need for strategic open space and recreational requirements.	
Sport participation	The proportion of adults participating in 30 minutes, moderate intensity sport has decreased in the most recent survey at the local, sub-national and national levels. In the District 42.0% of those in the survey were active in sport between October 2013 and October 2014.	Housing will largely be delivered through 'planning by appeal' with a lack of evidence provided by a plan-led approach. This may see housing delivered contrary to local needs.	12) To provide appropriate housing and accommodation to meet existing and future needs
Housing delivery	The NPPF's requirement for housing targets to be determined objectively at the District level (OAN) will ensure a higher dwellings per annum target than previously. The absence of an adopted Local Plan post-NPPF in which to determine housing targets and broad locations for growth.		
Housing ownership and need	There are 33,930 dwellings within Uttlesford District, 86.7% of which are privately owned. Over the period 2007-2021, there is a need for 4,200 (52%) units of market housing, 2,600 (32%) units of intermediate affordable housing and 1,300 (16%) units of social rented housing in the District.	A plan-led system allows specific developments to be come forward in line with tenure and housing mix requirements as specified in relevant policy. Then absence of a Plan and the relevant evidence base is unlikely to see such needs delivered.	
Gypsy and Traveller sites	There is a demand for more Gypsy and Traveller sites in Uttlesford, totalling 26 additional sites by 2033.	The absence of pitch provision in a plan-led system is likely to see an increase in unauthorised sites.	
School capacity	School age population numbers are projected to grow relatively slowly and school capacity within Uttlesford is expected to be sufficient to accommodate children in the District. Primary schools are predicted to have a surplus of 288 places for the 2018/19 academic year. Secondary schools are predicted to have a surplus of 415 for the same time period. However, when adjustments are made to the pupil forecast figures to take account of the numbers of primary and secondary pupils it is anticipated will be produced by new housing that is likely to be built by 2019 the forecasts show a deficit of some 400 places for primary schools and only a very small surplus of secondary school places.	Without factoring in school capacity within a plan-led system, cumulative pressure would be put existing educational facilities.	13) To promote the efficient use of resources and ensure the necessary infrastructure to support sustainable development
Utilities	The projected housing increases facing the wider County will put pressures on	Without a plan-led system the cumulative and holistic	

Key issues	Description / supporting evidence	Likely evolution in absence of Plan	SA objective
	utility suppliers.	approach to house building is unlikely to be evidenced.	
Transport	The projected housing increases facing the wider County will put pressures on road and rail infrastructure.	Without a plan-led system the cumulative and holistic approach to house building is unlikely to be evidenced.	
KS4 equivalent achieved	At 77.1% a higher proportion of pupils within Uttlesford attained five or more A*-C grades at key stage 4 (KS4) than the county, regional and national equivalent. 64.3% of pupils who gained five or more A*-C grades did so in English and Mathematics which is considerably more than the national proportion of 53.4%. The proportion of pupils attaining five or more A*-G grades was also above the national figure and only 0.4% of all pupils in the District didn't receive any passes at KS4.	Without a plan-led system the cumulative and holistic approach to house building is unlikely to be evidenced. This has implications for school capacities and the potential need for new educational facilities to be developed to support the future population.	14) To improve the education and skills of the population
Adult qualifications	<p>The population of Uttlesford District has in general more qualifications than the overall sub-national and national populations. 93.4% of the working age population of Uttlesford District which accounts for 46,700 people are qualified to at least level 1 or higher compared to 85.0% across Great Britain. Level 1 represents foundation GNVQ, NVQ 1 or up to 5 GCSEs at grades A*-C.</p> <p>The most significant difference is that Uttlesford has comparatively higher proportions of the population qualified at Level 3 and Level 4 and above. With 59.3% of the population having attained at least 2 or more A levels, advanced GNVQ, NVQ 3 or equivalent (level 3) and 35.6% achieving a higher national diploma, degree and higher degree level or equivalent (level 4). Uttlesford has a significantly higher skilled workforce in comparison to the county and a slightly higher proportion than the regional level.</p>		
Job density	Job density in Uttlesford (0.84) is higher than across the county (0.74), region (0.78) and nation (0.80).	The plan has the scope for a holistic approach to development to ensure that housing and employment development are allocated in support of one another. The plan can also safeguard sites for future employment use. The absence of a plan would likely see a less joined-up approach to housing and employment needs.	15) To ensure sustainable employment provision and economic growth
Location of businesses	Uttlesford District is predominantly rural in nature and as such a significant proportion of businesses are based within rural locations with only 15% defined as being urban based.		
Employment	The proportion of the District's working population who are economically active but unemployed is 3.0% which is below sub-national and national unemployment figures.		
	The District's Employment Land Review (ELR) expected to impact on employment land by identifying Stansted Airport as a prospective opportunity for growth despite BAA		

Key issues	Description / supporting evidence	Likely evolution in absence of Plan	SA objective
	<p>having withdrawn its planning application for a second runway. (UDC Employment Land Review [2011]). Since this, the ownership of the airport has changed from BAA to MAG (2015). There is currently a short fall in tertiary sector employment at Stansted. It is important that consideration be given to the location of future residential growth to ensure that local people can benefit from employment opportunities available at the airport.</p>		

Appendix III: SA of the Issues and Options 2015

Introduction

This appendix sets out the findings of the SA for the identified Areas of Search (AoS) and strategic scenarios identified in 2015. The findings of this work were presented in the SA Report that accompanied the Issues and Options Document on consultation in October 2015.⁸⁸

Appraisal of Areas of Search 2015

New settlement

AoS for potential new settlements were identified based on their potential to contribute to effective cross-boundary strategic planning priorities; minimise the need to travel by car; leisure opportunities and other facilities; and access to strategic highways and the rail network. Areas were excluded if they contained significant constraints, such as Registered Parks or Gardens and Sites of Special Scientific Interest (SSSIs).

The identified AoS for new settlements were as follows:

- Area of Search 1: M11 Junction 9a – east
- Area of Search 2: M11 Junction 9 – west
- Area of Search 3: Elsenham area
- Area of Search 4: M11 Junction 8 – north-west
- Area of Search 5: M11 Junction 8 – south-east
- Area of Search 6: South of A120, North of Hatfield Forest
- Area of Search 7: North of A120, west of Great Dunmow
- Area of Search 8: South of the A120
- Area of Search 9: West of Braintree

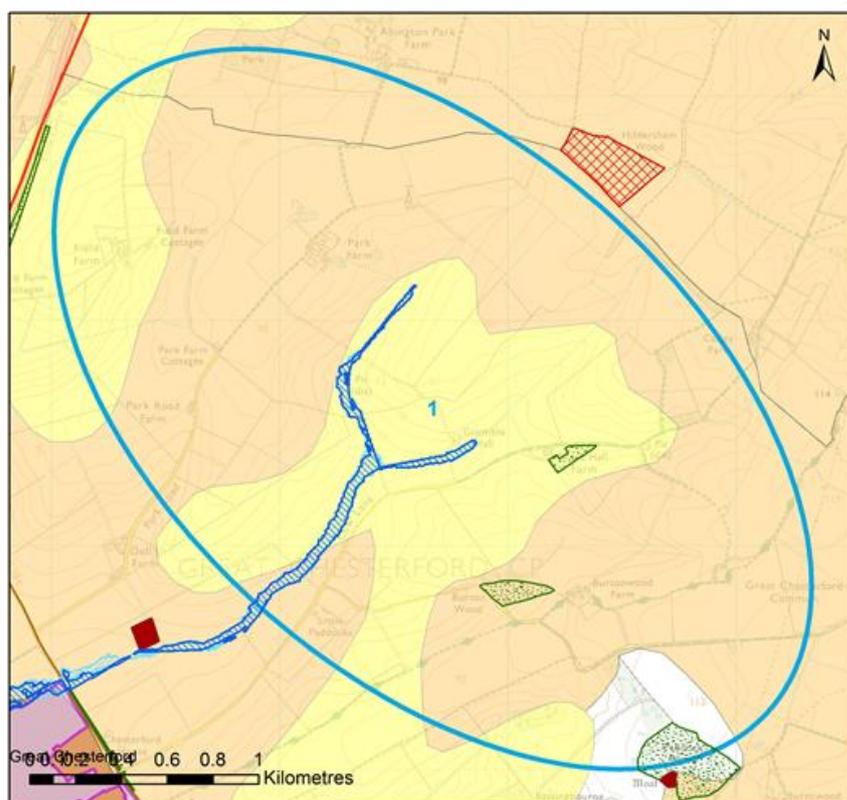
The following sub-sections identify each Area of Search in turn, and outline the 'key issues' and 'likely benefits' of a new settlement in each area at the time of writing in 2015.

Area of Search 1: M11 Junction 9a – East

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

⁸⁸ <https://www.uttlesford.gov.uk/article/4946/Sustainability-appraisal>

Area of Search 1 – Area and Constraints



Legend

● Railway Station	Adopted Development Limits	Greenbelt
● Primary School	Countryside Protection Zone	Grade 1 Agricultural Land
● Secondary School	Development Areas 2015	Grade 2 Agricultural Land
▨ Flood Risk Zone 3	Built Up Areas	Grade 3 Agricultural Land
▨ Flood Risk Zone 2	Key Villages	Grade 4 Agricultural Land
▨ Registered Parks and Gardens	New Settlement AoS	Grade 5 Agricultural Land
■ Scheduled Monuments	Public Safety Zones	B Road
▨ LoWS - Local Wildlife Site	Towns AoS	A Road
▨ SSSIs	Villages	Motorway
▭ Airport Noise Contours		Railway

© Crown copyright. All rights reserved. Essex County Council 100019602, 2015

Potential Issues identified at the 'Areas of Search (AoS) and Strategic Scenarios Consultation SA' stage

- The presence of SSSIs in close proximity and LoWSs on site.
- Landscape has relatively high sensitivity to change / development.
- Possible coalescence with Great Chesterford
- The majority of the AoS is within Grade 2 Agricultural Land.
- Scheduled Monuments in close proximity.
- Some Flood Risk Zone 3.
- The broad location of the area is not well related to existing settlements of a significant population.
- Existing local services would have to be sufficient or expansion possible to support the increase in population in the earlier stages of the new settlement's development

- It would be expected that there would be a large amount of commuting outside the District for jobs due to the possibility of a range of transport options in the area.

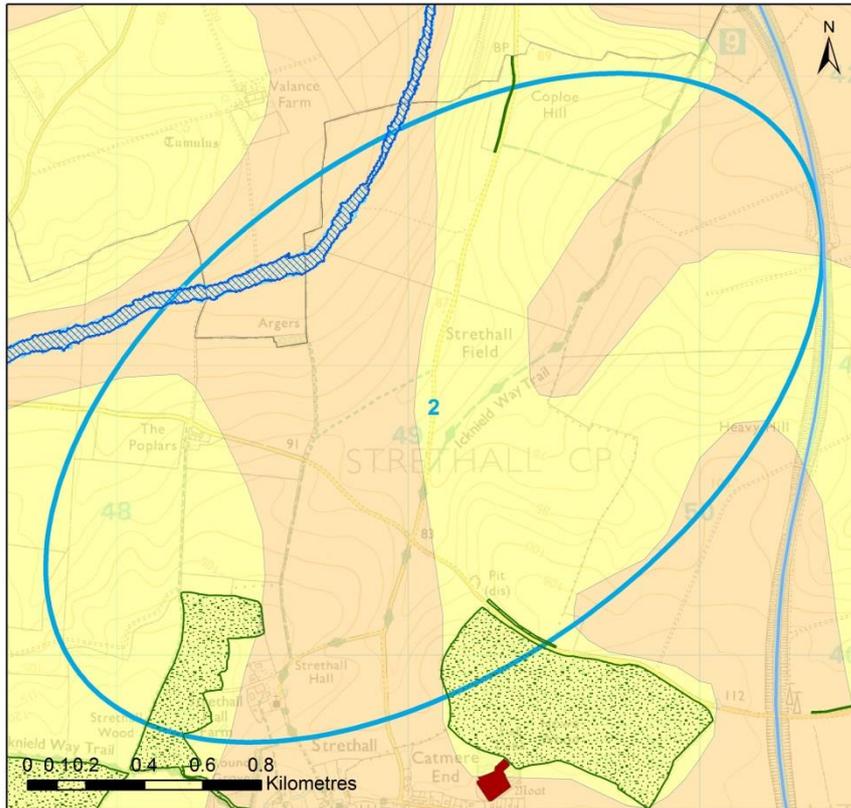
Likely Benefits identified at the 'Areas of Search (AoS) and Strategic Scenarios Consultation SA' stage

- Alleviates cultural heritage impacts associated with development of existing settlements.
- Potential for renewable energy sources to be integrated into development.
- The potential scale of the development maximises the possibility of housing to be well supported by a range of services, infrastructure and employment opportunities.
- Access to rail services would be via Great Chesterford rail station to the south and good access to the M11 (junction 9) and A11 exists to the north.
- Development of this potential scale would require an increase in GP capacity and healthcare facilities.
- It is likely that thresholds would warrant a new primary school and potentially in time a new secondary school or expansion of that in Saffron Walden.

Area of Search 2: M11 Junction 9 – West

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

Area of Search 2 – Area and Constraints



Legend

● Railway Station	Adopted Development Limits	Greenbelt
● Primary School	Countryside Protection Zone	Grade 1 Agricultural Land
● Secondary School	Development Areas 2015	Grade 2 Agricultural Land
▨ Flood Risk Zone 3	Built Up Areas	Grade 3 Agricultural Land
▨ Flood Risk Zone 2	Key Villages	Grade 4 Agricultural Land
▨ Registered Parks and Gardens	New Settlement AoS	Grade 5 Agricultural Land
■ Scheduled Monuments	Public Safety Zones	B Road
▨ LoWS - Local Wildlife Site	Towns AoS	A Road
▨ SSSIs	Villages	Motorway
▨ Airport Noise Contours		Railway

© Crown copyright. All rights reserved. Essex County Council 100019602, 2015

Potential Issues identified at the 'Areas of Search (AoS) and Strategic Scenarios Consultation SA' stage

- The presence of LoWSs on site.
- Landscape has relatively high sensitivity to change / development.
- A large proportion of the area is Grade 2 Agricultural Land.
- There are some relatively small areas of Flood Risk Zone 3 within the area.

- Although Great Chesterford rail station is in close proximity a new settlement in this broad area would not be easily accessible due to the location of the M11.
- Road access to the M11 would be via Junction 9 and a series of A – roads and could reasonably be expected to increase congestion in this area.
- The AoS would see significant development in an area that is not well related to existing settlements.
- It would be expected that there would be a large amount of commuting outside the District for jobs due to the possibility of a range of transport options in the area.

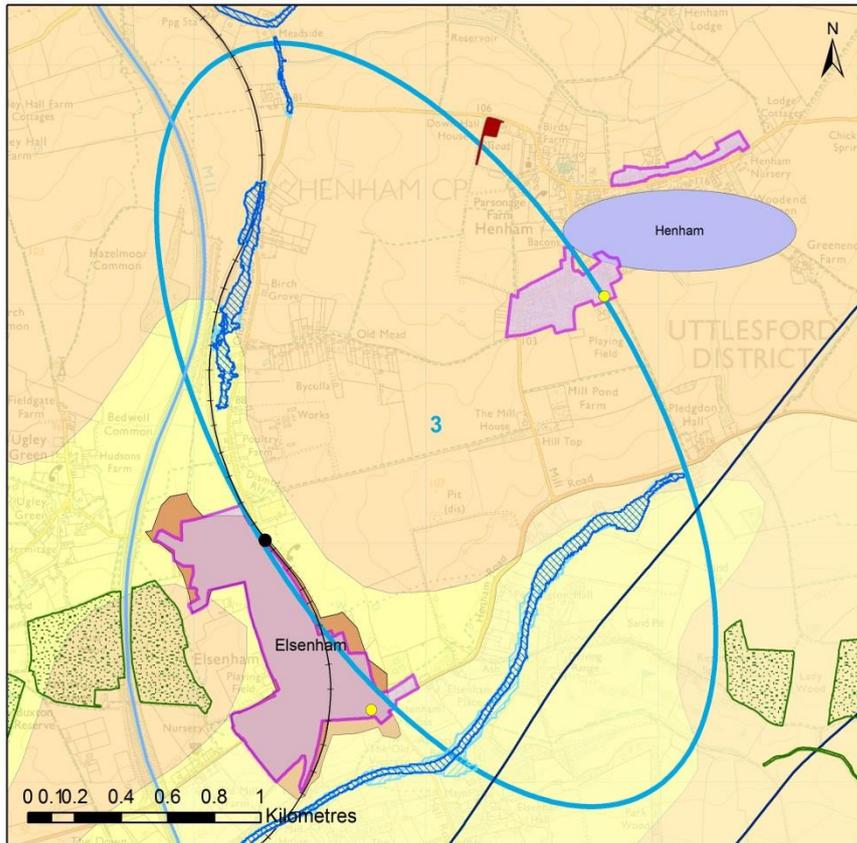
Likely Benefits identified at the 'Areas of Search (AoS) and Strategic Scenarios Consultation SA' stage

- Alleviates cultural heritage impacts associated with development of existing settlements.
- Maximises the potential for renewable energy sources to be integrated into development.
- The scale of the development maximises the possibility of housing to be well supported by a range of services, infrastructure and employment opportunities.
- Development of this potential scale would require an increase in GP capacity and healthcare facilities.
- It is likely that thresholds would warrant a new primary school and potentially in time a new secondary school or expansion of that in Saffron Walden if viable and suitable.

Area of Search 3: Elsenham area

This area of search mainly includes land the north and east of Elsenham, as far as Henham with its Conservation Area.

Area of Search 3 – Area and Constraints



Legend

● Railway Station	Adopted Development Limits	Greenbelt
● Primary School	Countryside Protection Zone	Grade 1 Agricultural Land
● Secondary School	Development Areas 2015	Grade 2 Agricultural Land
Flood Risk Zone 3	Built Up Areas	Grade 3 Agricultural Land
Flood Risk Zone 2	Key Villages	Grade 4 Agricultural Land
Registered Parks and Gardens	New Settlement AoS	Grade 5 Agricultural Land
Scheduled Monuments	Public Safety Zones	B Road
LoWS - Local Wildlife Site	Towns AoS	A Road
SSSIs	Villages	Motorway
Airport Noise Contours		Railway

© Crown copyright. All rights reserved. Essex County Council 100019602, 2015

Potential Issues identified at the ‘Areas of Search (AoS) and Strategic Scenarios Consultation SA’ stage

- Elsenham Woods SSSI is located outside but in close proximity to the broad area.
- The landscape has a moderate to high sensitivity to change / development.
- The majority of the area is classified as Grade 2 Agricultural Land.
- A Scheduled Monument within the area to the north west of the existing settlement of Henham. There are small areas of Flood Risk Zone 3 within the area.
- There are generally poor roads in the area and access to the M11 does not currently exist.

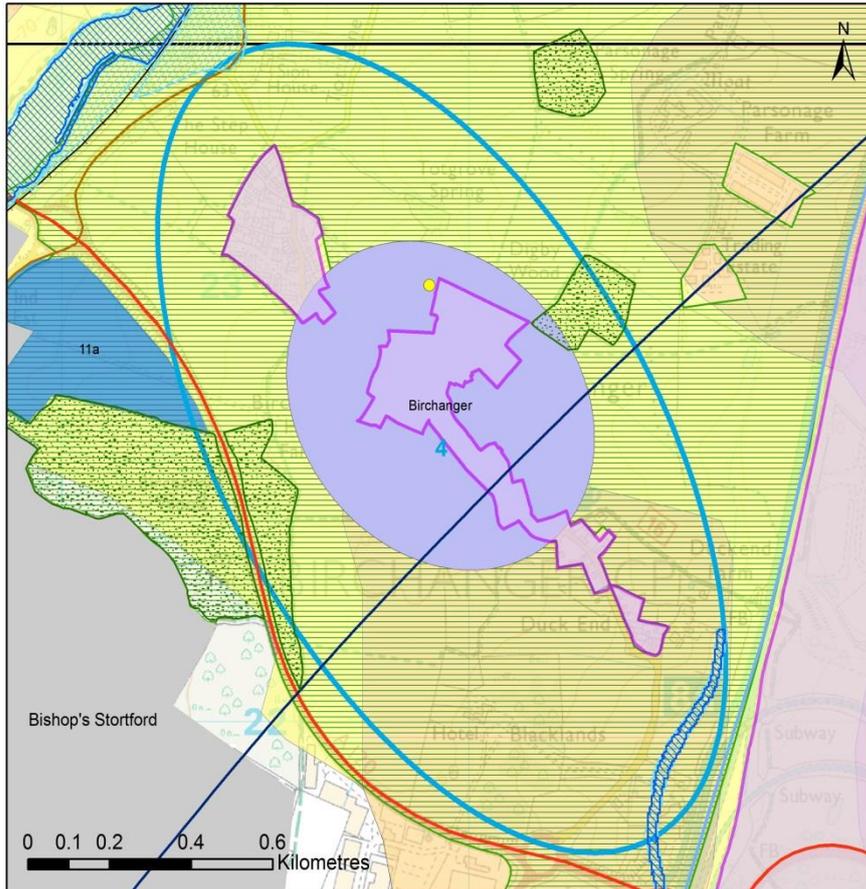
Likely Benefits identified at the 'Areas of Search (AoS) and Strategic Scenarios Consultation SA' stage

- There are no LoWSs or other wildlife designations in the area.
- Alleviates cultural heritage impacts associated with development of existing settlements.
- Maximises the potential for renewable energy sources to be integrated into development.
- The potential scale of development maximises the possibility of housing to be well supported by a range of services, infrastructure and employment opportunities to minimise the need to travel.
- The area would have access to Elsenham Station for rail services.
- There are some existing services and facilities within the existing village of Elsenham.
- Development of this potential scale would require an increase in GP capacity and healthcare facilities.
- The broad location is relatively well related to the existing settlement of Elsenham. The location is also in close proximity to Stansted Mountfitchet. It is possible that the needs of these existing settlements would be met by a new settlement in relatively close proximity.
- It is likely that thresholds would warrant a new primary school and potentially in time a new secondary school to be provided. Current secondary school provision is distanced from the development.
- Relatively well related to employment opportunities at Stansted airport and its surrounds.

Area of Search 4: M11 Junction 8 – North-west

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

Area of Search 4 – Area and Constraints



Legend

- | | | |
|--------------------------------|-----------------------------|---------------------------|
| ● Railway Station | Adopted Development Limits | Greenbelt |
| ● Primary School | Countryside Protection Zone | Grade 1 Agricultural Land |
| ● Secondary School | Development Areas 2015 | Grade 2 Agricultural Land |
| ▨ Flood Risk Zone 3 | Built Up Areas | Grade 3 Agricultural Land |
| ▨ Flood Risk Zone 2 | Key Villages | Grade 4 Agricultural Land |
| ▨ Registered Parks and Gardens | New Settlement AoS | Grade 5 Agricultural Land |
| ■ Scheduled Monuments | Public Safety Zones | B Road |
| ▨ LoWS - Local Wildlife Site | Towns AoS | A Road |
| ▨ SSSIs | Villages | Motorway |
| ▨ Airport Noise Contours | | Railway |

© Crown copyright. All rights reserved. Essex County Council 100019602, 2015

Potential Issues identified at the 'Areas of Search (AoS) and Strategic Scenarios Consultation SA' stage

- There are a number of LoWSs within the area.
- The area is within the Green Belt.
- The landscape has a relatively high sensitivity to change / development.
- Could possibly diminish the strategic separation between Bishop's Stortford and Birchanger, between Birchanger and Stansted Mountfitchet and / or Bishop's Stortford and Stansted Mountfitchet.
- A large proportion of the area is classified as Grade 2 Agricultural Land.
- When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed.
- There is a main river with associated Flood Risk 3 to the south east of the area.
- The area is bounded by the A120 and there is a possibility that this would need to be crossed to access services.

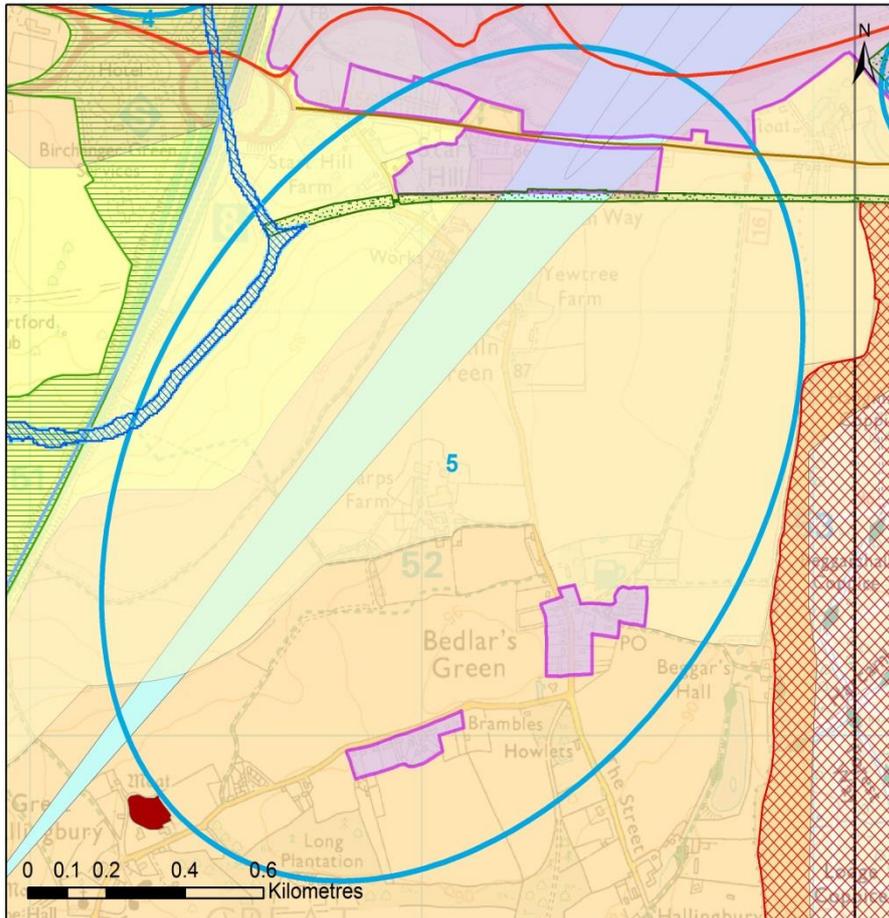
Likely Benefits identified at the 'Areas of Search (AoS) and Strategic Scenarios Consultation SA' stage

- Alleviates cultural heritage impacts associated with development of existing settlements
- The potential scale of the development maximises the possibility of housing to be well supported by a range of services, infrastructure and employment opportunities to minimise the need to travel.
- Rail services are accessible in Bishop's Stortford to the south and Stansted Mountfitchet to the north with potential access via a number of possible routes.
- There are a good range of existing facilities in the town of Bishop's Stortford.
- There is good access to strategic roads with access to the A120 to the south of the area and good links to junction 8 of the M11 to the east.
- Development of this potential scale would require an increase in GP capacity and healthcare facilities.
- It is possible that expansion to existing infrastructure may be suitable in some instances should development be of a sufficient size and yield to make such provision viable.
- It is likely that the potential size of any development would warrant a new primary school to be provided and in time potentially a new secondary school.
- The AoS benefits from good accessibility to the strategic road network and is well related to locations of existing employment development in Bishop's Stortford.

Area of Search 5: M11 Junction 8 – South-east

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

Area of Search 5 – Area and Constraints



Legend

- | | | |
|------------------------------|-----------------------------|---------------------------|
| ● Railway Station | Adopted Development Limits | Greenbelt |
| ● Primary School | Countryside Protection Zone | Grade 1 Agricultural Land |
| ● Secondary School | Development Areas 2015 | Grade 2 Agricultural Land |
| Flood Risk Zone 3 | Built Up Areas | Grade 3 Agricultural Land |
| Flood Risk Zone 2 | Key Villages | Grade 4 Agricultural Land |
| Registered Parks and Gardens | New Settlement AoS | Grade 5 Agricultural Land |
| Scheduled Monuments | Public Safety Zones | B Road |
| LoWS - Local Wildlife Site | Towns AoS | A Road |
| SSSIs | Villages | Motorway |
| Airport Noise Contours | | Railway |

© Crown copyright. All rights reserved. Essex County Council 100019602, 2015

Potential Issues identified at the 'Areas of Search (AoS) and Strategic Scenarios Consultation SA' stage

- The area would be bordered by Hatfield Forest SSSI (and NNR) to the east.
- The start of the Flitch Way LoWS crosses the majority of the area in the north.
- The landscape has a relatively high sensitivity to change / development.
- The majority of the area is classified as Grade 2 Agricultural Land.
- There is a Scheduled Monument to the south west of the broad area.
- The neighbouring SSSI and Green Belt may reduce the potential for some renewable energy schemes to be integrated into any development of the area.
- There is an area of Flood Risk Zone 3 that runs adjacent to the River Stort.
- Access may have some difficulties associated with the area being bounded by the M11 and the A120 and the possibility that these would need to be crossed.
- The area is within close proximity to Stansted Airport, and parts are within the Public Safety Zone extending south from the line of the runway.
- Much of area lies directly under the Stansted take-off and landing corridor and noise contours indicate that there could be potential health implications experienced within the area.
- The broad area is largely isolated from existing housing, and bordered with constraints.

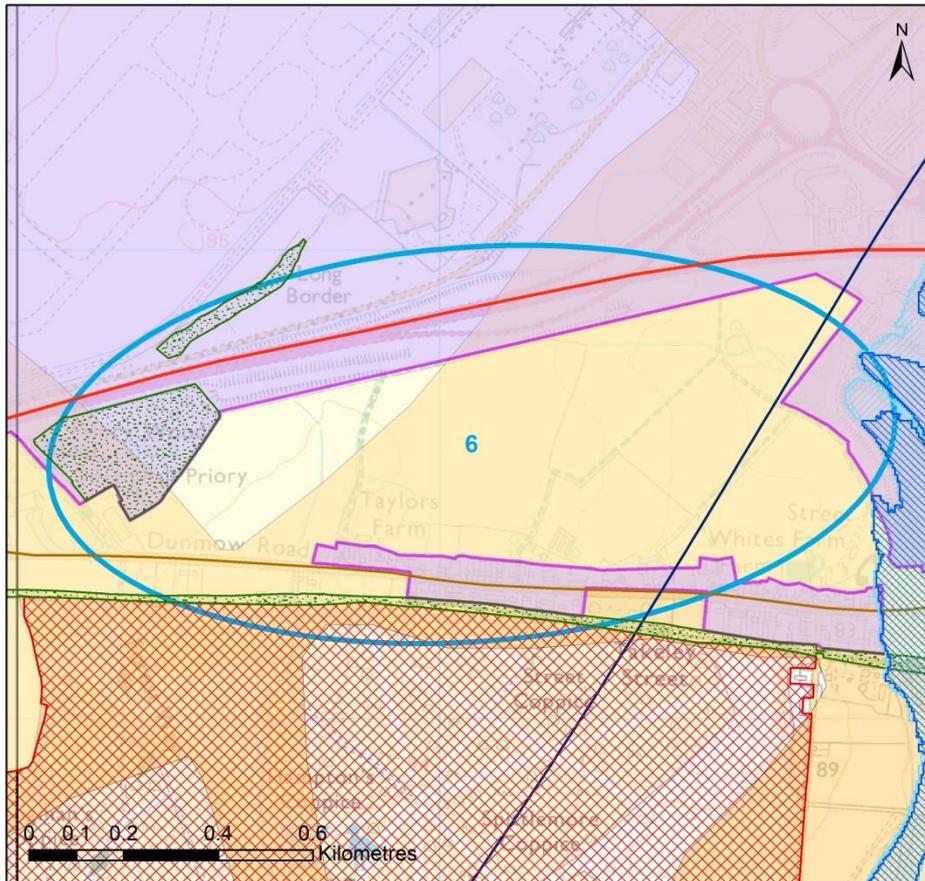
Likely Benefits identified at the 'Areas of Search (AoS) and Strategic Scenarios Consultation SA' stage

- Alleviates cultural heritage impacts associated with development of existing settlements.
- The potential scale of the development maximises the possibility of housing to be well supported by a range of services, infrastructure and employment opportunities to minimise the need to travel.
- Rail links are in relatively close proximity at Bishop's Stortford.
- The area is well related to the A120 and the M11.
- Development of this potential scale would require an increase in GP capacity and healthcare facilities.
- It is likely that the potential size of any development would warrant a new primary school to be provided and in time potentially a new secondary school.
- The area is well related to Bishop's Stortford and existing employment opportunities at Stansted Airport and its surrounds.

Area of Search 6: South of A120, North of Hatfield Forest

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

Area of Search 6 – Area and Constraints



Legend

- | | | |
|--------------------------------|-----------------------------|---------------------------|
| ● Railway Station | Adopted Development Limits | Greenbelt |
| ● Primary School | Countryside Protection Zone | Grade 1 Agricultural Land |
| ● Secondary School | Development Areas 2015 | Grade 2 Agricultural Land |
| ▨ Flood Risk Zone 3 | Built Up Areas | Grade 3 Agricultural Land |
| ▨ Flood Risk Zone 2 | Key Villages | Grade 4 Agricultural Land |
| ▨ Registered Parks and Gardens | New Settlement AoS | Grade 5 Agricultural Land |
| ▨ Scheduled Monuments | Public Safety Zones | B Road |
| ▨ LoWS - Local Wildlife Site | Towns AoS | A Road |
| ▨ SSSIs | Villages | Motorway |
| ▨ Airport Noise Contours | | Railway |

© Crown copyright. All rights reserved. Essex County Council 100019602, 2015

Potential Issues identified at the 'Areas of Search (AoS) and Strategic Scenarios Consultation SA' stage

- The area borders Hatfield Forest SSSI / NNR.
- The area contains numerous LoWSs.
- The landscape has a relatively high sensitivity to change / development.
- The majority of the area is classified as Grade 2 Agricultural Land.
- It is likely that certain renewable energy schemes may be incompatible with the neighbouring airport.
- There may be some air pollution associated with the airport and the strategic road network.
- There are some areas of Flood Risk Zone 3 to the east.
- There may be some access difficulties associated with the area being bounded by the A120 to the north and the possibility that this would need to be crossed.
- The area is within close proximity to Stansted Airport, and would border the Public Safety Zone extending south from the line of the runway.
- The area is not particularly well connected to existing housing or settlements.
- Certain development would likely be incompatible with any potential future expansion of Stansted Airport and any extension of the current Public Safety Zone should this be forthcoming.

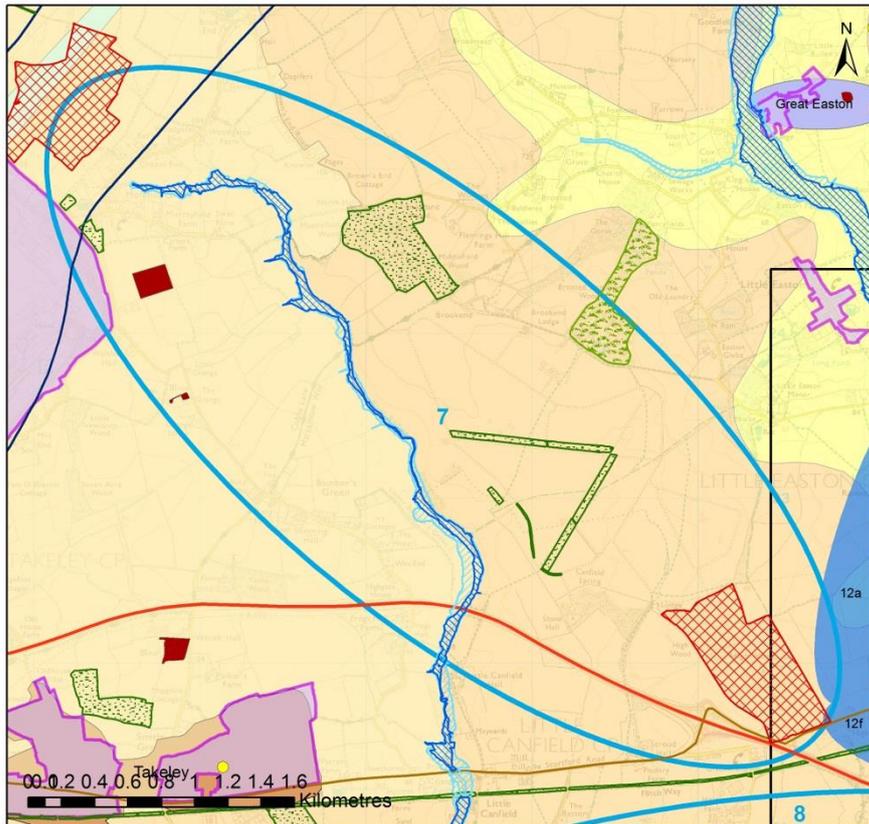
Likely Benefits identified at the 'Areas of Search (AoS) and Strategic Scenarios Consultation SA' stage

- There is no perceived coalescence of the airport with any existing settlements.
- Alleviates cultural heritage impacts associated with development of existing settlements.
- Rail access would be via Stansted Airport, Stansted Mountfitchet or Bishop's Stortford stations.
- Numerous bus links exist with a good range of connectivity to the numerous parts of the region.
- The potential scale of the development maximises the possibility of housing to be well supported by a range of services, infrastructure and employment opportunities to minimise the need to travel.
- Development of this potential scale would require an increase in GP capacity and healthcare facilities.
- There is good access to the strategic road network and sustainable transport links.
- It is possible that the potential size of any development would warrant a new primary school to be provided (however the compatibility of any new school's location with the neighbouring airport would also have to be assessed).
- There is good accessibility via the strategic road network to Bishop's Stortford and existing employment opportunities at Stansted Airport and surrounds.

Area of Search 7: North of A120, West of Great Dunmow

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

Area of Search 7 – Area and Constraints



Legend

- | | | |
|--------------------------------|-----------------------------|---------------------------|
| ● Railway Station | Adopted Development Limits | Greenbelt |
| ● Primary School | Countryside Protection Zone | Grade 1 Agricultural Land |
| ● Secondary School | Development Areas 2015 | Grade 2 Agricultural Land |
| ▨ Flood Risk Zone 3 | Built Up Areas | Grade 3 Agricultural Land |
| ▨ Flood Risk Zone 2 | Key Villages | Grade 4 Agricultural Land |
| ▨ Registered Parks and Gardens | New Settlement AoS | Grade 5 Agricultural Land |
| ■ Scheduled Monuments | Public Safety Zones | B Road |
| ▨ LoWS - Local Wildlife Site | Towns AoS | A Road |
| ▨ SSSIs | Villages | Motorway |
| ▨ Airport Noise Contours | | Railway |

© Crown copyright. All rights reserved. Essex County Council 100019602, 2015

Potential Issues identified at the 'Areas of Search (AoS) and Strategic Scenarios Consultation SA' stage

- There are two SSSIs in the area and a large number of LoWSs.
- The landscape has a moderate to high sensitivity to change / development.
- The area is partly within the Countryside Protection Zone and as such development may be limited in the north west to prevent any coalescence with the airport.
- The majority of the area is classified as Grade 2 Agricultural Land.
- There is a Registered Historic Park in the area; the Grade II listed Easton Lodge. Two Scheduled Monuments are also present in the north west of the area.
- The area contains Flood Risk Zone 3 surrounding the River Roding.
- The broad area is distanced from the rail network.

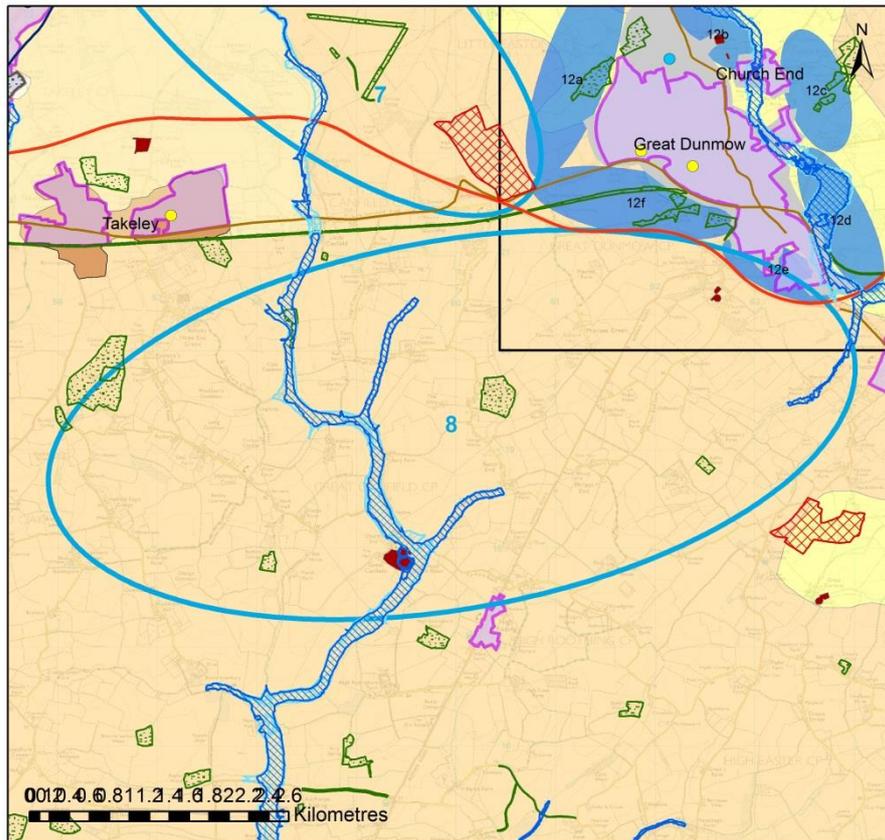
Likely Benefits identified at the 'Areas of Search (AoS) and Strategic Scenarios Consultation SA' stage

- Alleviates cultural heritage impacts associated with development of existing settlements.
- Maximises the potential for renewable energy sources to be integrated into development.
- The potential scale of the development maximises the possibility of housing to be well supported by a range of services, infrastructure and employment opportunities to minimise the need to travel.
- Access to A120 is good and there are a range of services in nearby Great Dunmow.
- Development of this potential scale would require an increase in GP capacity and healthcare facilities.
- The area is well related to the existing settlement of Great Dunmow and also, should it expand to the entire size of the area (subject to other constraints), to Elsenham in the north west.
- The area is in close proximity to employment opportunities and transport links at Great Dunmow and Stansted Airport.
- It is possible that the needs of existing settlements would be met by a new settlement in this area.
- There is the potential for good access to the strategic road network.
- It is likely that the potential size of any development would warrant a new primary school to be provided and in time potentially a new secondary school.

Area of Search 8: South of the A120

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

Area of Search 8 – Area and Constraints



Legend

- | | | |
|------------------------------|-----------------------------|---------------------------|
| ● Railway Station | Adopted Development Limits | Greenbelt |
| ● Primary School | Countryside Protection Zone | Grade 1 Agricultural Land |
| ● Secondary School | Development Areas 2015 | Grade 2 Agricultural Land |
| Flood Risk Zone 3 | Built Up Areas | Grade 3 Agricultural Land |
| Flood Risk Zone 2 | Key Villages | Grade 4 Agricultural Land |
| Registered Parks and Gardens | New Settlement AoS | Grade 5 Agricultural Land |
| Scheduled Monuments | Public Safety Zones | B Road |
| LoWS - Local Wildlife Site | Towns AoS | A Road |
| SSSIs | Villages | Motorway |
| Airport Noise Contours | | Railway |

© Crown copyright. All rights reserved. Essex County Council 100019602, 2015

Potential Issues identified at the 'Areas of Search (AoS) and Strategic Scenarios Consultation SA' stage

- There are a number of SSSIs in close proximity to the broad area.
- There are a number of LoWSs in the area.
- The landscape has a moderate to high sensitivity to change / development.
- The whole of the area is classified as Grade 2 Agricultural Land.
- There are a two Scheduled Monuments within the area.
- The area incorporates Flood Risk Zone 3 surrounding the River Roding and Strood Hall Brook.
- There is no current or possible access to rail links, with the nearest station being located at Stansted Airport.
- Southern parts of the area could be considered remote in terms of accessibility both in terms of any existing services and access to the strategic road network.
- Southern parts of the area could be considered less sustainable than northern parts due in part to their more isolated nature and there would likely be some different requirements as to housing mix and tenure type in these areas to meet more local / rural housing needs.
- The presence of bounding SSSIs to the east and west of the area may act as constraints to some infrastructure provision.

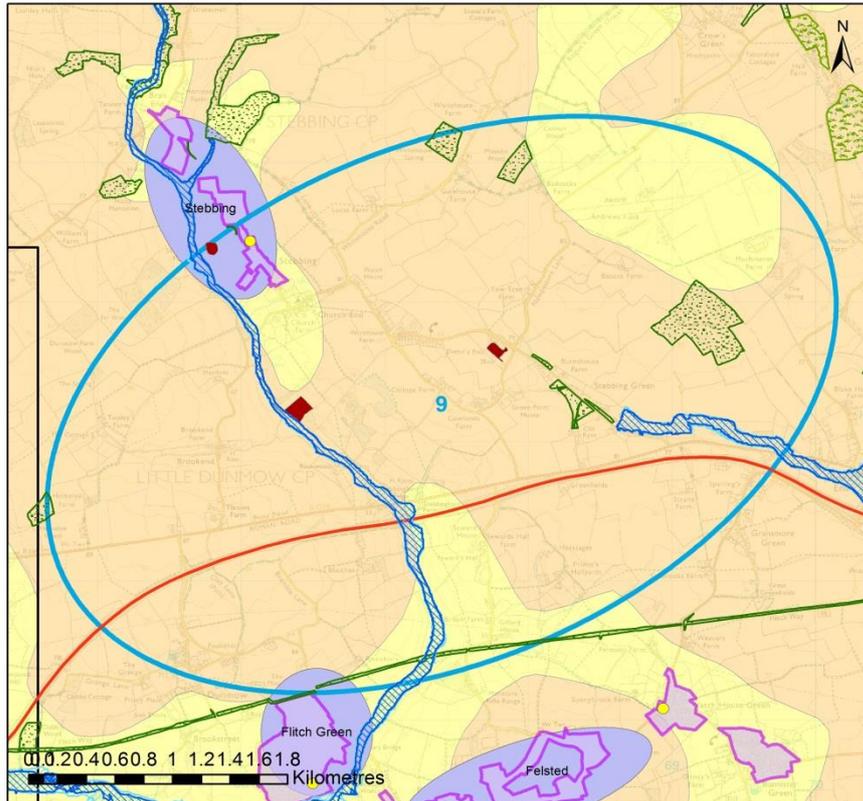
Likely Benefits identified at the 'Areas of Search (AoS) and Strategic Scenarios Consultation SA' stage

- Alleviates cultural heritage impacts associated with development of existing settlements.
- Maximises the potential for renewable energy sources to be integrated into development.
- The potential scale of the development maximises the possibility of housing to be well supported by a range of services, infrastructure and employment opportunities to minimise the need to travel
- Access to the A120 exists in the north and northern parts of the area would be served by the range of services at Great Dunmow.
- Development of this potential scale would require an increase in GP capacity and healthcare facilities.
- Northern parts of the broad location are also in close proximity to employment opportunities and transport links at Stansted Airport.
- It is likely that the potential size of any new settlement would warrant a new primary school to be provided and in time a new secondary school.

Area of Search 9: West of Braintree

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

Area of Search 9 – Area and Constraints



Legend

- | | | |
|--------------------------------|-----------------------------|---------------------------|
| ● Railway Station | Adopted Development Limits | Greenbelt |
| ● Primary School | Countryside Protection Zone | Grade 1 Agricultural Land |
| ● Secondary School | Development Areas 2015 | Grade 2 Agricultural Land |
| ▨ Flood Risk Zone 3 | Built Up Areas | Grade 3 Agricultural Land |
| ▨ Flood Risk Zone 2 | Key Villages | Grade 4 Agricultural Land |
| ▨ Registered Parks and Gardens | New Settlement AoS | Grade 5 Agricultural Land |
| ▨ Scheduled Monuments | Public Safety Zones | B Road |
| ▨ LoWS - Local Wildlife Site | Towns AoS | A Road |
| ▨ SSSIs | Villages | Motorway |
| ▨ Airport Noise Contours | | Railway |

© Crown copyright. All rights reserved. Essex County Council 100019602, 2015

Potential Issues identified at the 'Areas of Search (AoS) and Strategic Scenarios Consultation SA' stage

- The area contains a number of LoWSs.
- Development in the area could see the coalescence of Stebbing in the north and Flich Green in the south, although it should be noted that the presence of the A120 running through the area would act as a means of separation.
- The landscape of the majority of the area has a moderate to high sensitivity to change. The western part of the area has a higher sensitivity to change in association with the River Chelmer.
- The majority of the area is classified as Grade 2 Agricultural Land.
- There are a number of Scheduled Monuments in the area north of the A120.
- A tributary to the River Chelmer runs through the middle of the site from north to south and this is within Flood Risk Zone 3. There is also the presence of Flood Risk Zone 3 within the eastern part of the site.
- The area is removed from rail services within the District and the nearest train station would be the branch line that serves the town of Braintree.
- There will be some cross-boundary housing implications of the AoS which may affect the proportion of the dwelling yield that can contribute to the District's housing target.

Likely Benefits identified at the 'Areas of Search (AoS) and Strategic Scenarios Consultation SA' stage

- Alleviates cultural heritage impacts associated with development of existing settlements.
- Maximises the potential for renewable energy sources to be integrated into development.
- The potential scale of the development maximises the possibility of housing to be well supported by a range of services, infrastructure and employment opportunities to minimise the need to travel.
- The area benefits from access to A120 and is well related to public transport from Braintree and Great Dunmow.
- Development of this potential scale would require an increase in GP capacity and healthcare facilities.
- Southern and central parts of the AoS have good access to the strategic road network.
- It is likely that the potential size of any new settlement would warrant a new primary school to be provided and in time a new secondary school.
- Southern and central parts of the AoS benefit from good accessibility to the strategic road network and are reasonably well related to Great Dunmow and Braintree. As such the principle of employment development appears suitable in proximity to the A120.

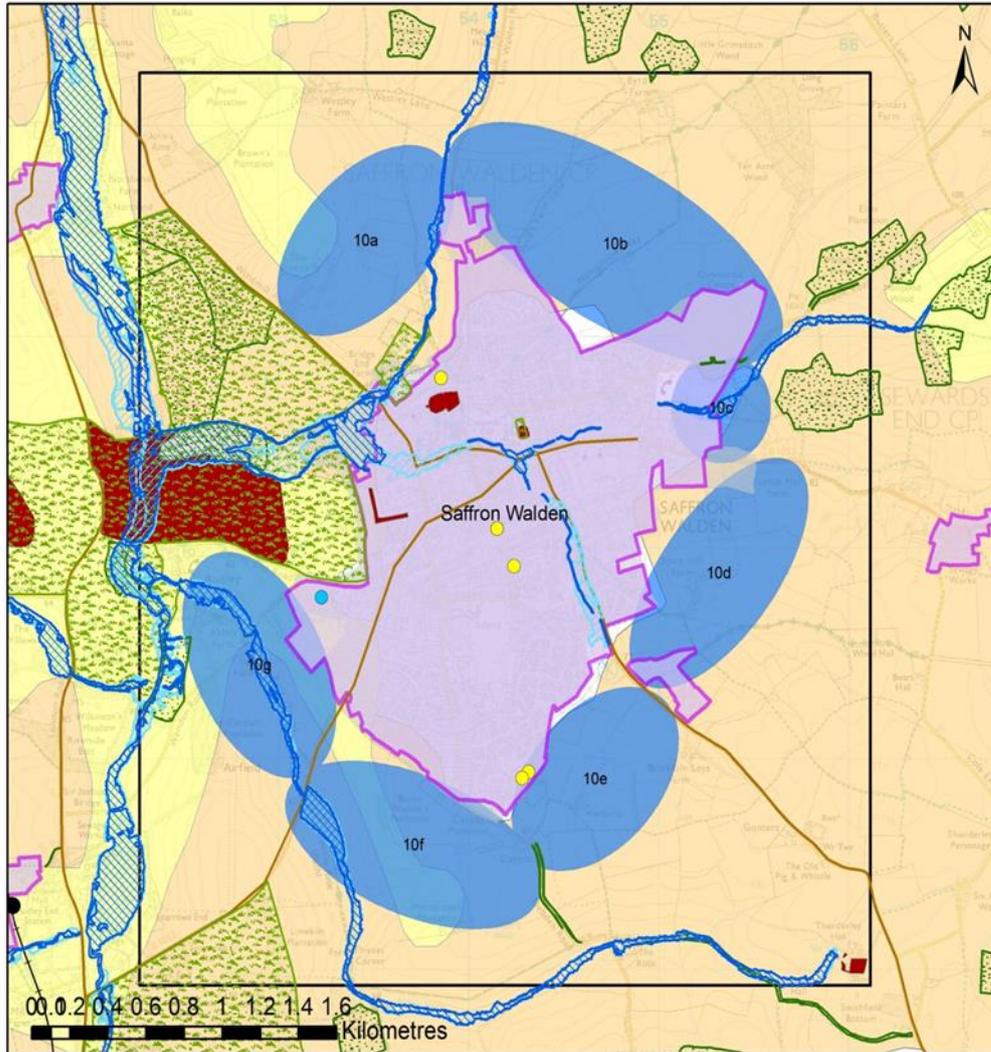
Towns

Saffron Walden

Seven Areas of Search were identified.

- Area of Search 10a between Windmill Hill and Little Walden Road
- Area of Search 10b between Little Walden Road and Ashdon Road
- Area of Search 10c between Ashdon Road and Radwinter Road
- Area of Search 10d between Radwinter Road and Thaxted Road
- Area of Search 10e between Thaxted Road and Debden Road
- Area of Search 10f between Debden Road and Newport Road
- Area of Search 10g between Newport Road and Audley End Road

The following map looks at the broad constraints of these areas and the corresponding sub-sections respond to an appraisal of the sustainability implications of development in these locations.



Legend

- | | | |
|------------------------------|-----------------------------|---------------------------|
| ● Railway Station | Adopted Development Limits | Greenbelt |
| ● Primary School | Countryside Protection Zone | Grade 1 Agricultural Land |
| ● Secondary School | Development Areas 2015 | Grade 2 Agricultural Land |
| Flood Risk Zone 3 | Built Up Areas | Grade 3 Agricultural Land |
| Flood Risk Zone 2 | Key Villages | Grade 4 Agricultural Land |
| Registered Parks and Gardens | New Settlement AoS | Grade 5 Agricultural Land |
| Scheduled Monuments | Public Safety Zones | B Road |
| LoWS - Local Wildlife Site | Towns AoS | A Road |
| SSSIs | Villages | Motorway |
| Airport Noise Contours | | Railway |

© Crown copyright. All rights reserved. Essex County Council 100019602, 2015

Area of Search 10a - between Windmill Hill and Little Walden Road

Summary of Broad Sustainability Impacts

Potential issues to overcome:

- Heritage and Landscape impacts associated with the proximity to Audley Park to the west and also the nearby Bridge End Gardens Registered Historic Garden
- Development in this area would very significantly diminish the sense of place and local distinctiveness of this part of Saffron Walden
- The majority of the area is classified as Grade 2 Agricultural Land
- The AoS is also in close proximity to the Conservation Area to the south east
- It is possible that the landscape implications and historic environment constraints may render some renewable energy schemes unsuitable
- There may be impacts on air quality levels, particularly in close proximity to the town's AQMA
- A small area of the AoS to the west of Little Walden Road is within Flood Risk Zone 3
- There is limited access to strategic roads in this AoS
- Access by car to the train station would direct traffic through the town
- There is limited access to strategic roads however for access to a regional centre although it should be noted that this AoS offers comparably better access to strategic roads than other AoSs exploring urban extensions in Saffron Walden
- Housing development in this area is likely to be relatively isolated from existing housing within the Saffron Walden area
- There would likely be pressures on the capacity of nearby schools resulting from the further development in Saffron Walden, and also the capacity in nearby healthcare and primary healthcare facilities
- The suitability of employment land in this area would largely depend on compatibility with the existing constraints regarding the landscape and the surrounding historic asset designations. This may limit the suitability of particular use classes.

Likely benefits:

- The AoS will be sufficiently distanced from wildlife designations and as such there are no known constraints within the area.
- There are a range of existing facilities in town which are suitably accessible by Windmill Hill and Little Walden Road. This AoS would effectively be serviced by Audley End train station
- bus links exist to the rail station from the High Street in Saffron Walden.

Area of Search 10b - between Little Walden Road and Ashdon Road

Summary of Broad Sustainability Impacts

Potential issues to overcome:

- Development in the rural part of this area beyond the town edge would significantly diminish the sense of place and local distinctiveness

- The whole of the area is classified as Grade 2 Agricultural Land
- There may be impacts on air quality levels, particularly in close proximity to the town's AQMA
- There is limited access to strategic roads in this AoS
- Access by car to the train station would direct traffic through the town
- There would likely be pressures on the capacity of nearby schools resulting from further development in Saffron Walden, and also the capacity in nearby healthcare and primary healthcare facilities

Likely benefits:

- The majority of the AoS will be sufficiently distanced from wildlife designations
- The AoS is sufficiently distanced from the Conservation Area that represents the town's historic core to the south west
- It may be possible to integrate renewable energy projects
- The majority of the AoS is not within Flood Risk Zones 2 or 3
- There are a range of existing facilities in town which are suitably accessible by Little Walden Road and Ashdon Road
- Bus links exist to the rail station from the High Street in Saffron Walden
- The AoS would see development that is well assimilated with existing housing
- Local primary schools would be accessible for the southern parts of the site
- The AoS would be in close proximity to employment land to the east of the existing town area. The AoS is also located in close proximity to extant permissions for employment land

Area of Search 10c - between Ashdon Road and Radwinter Road

Summary of Broad Sustainability Impacts

Potential issues to overcome:

- The AoS is in close proximity to a LoWS to the east and there are two small LoWSs within the northern boundary of the area
- The whole of the area is classified as Grade 2 Agricultural Land
- There may be impacts on air quality levels, particularly in close proximity to the town's AQMA
- It is possible that certain elements of the area may not be compatible with neighbouring uses regarding noise and their hours of operation.
- A relatively large part of the site is within Flood Zone 3 cutting through the AoS from east to west
- There is limited access to strategic roads in this AoS
- Access by car to the train station would direct traffic through the town
- The majority of this area is taken up with a fuel depot and there are likely to be safety implications and therefore suitability concerns of housing development in close proximity

- It is uncertain therefore whether the AoS is of a suitable size to deliver any significant housing delivery
- There would likely be pressures on the capacity of nearby schools resulting from the further development in Saffron Walden, and also the capacity in nearby healthcare and primary healthcare facilities
- The site may not be large enough to meet thresholds for a new primary school or any expansion of those that currently exist.
- The suitability of employment land in this area would largely depend on compatibility with the existing constraints regarding the landscape and the surrounding historic asset designations. This may limit the suitability of particular use classes.

Likely benefits:

- The AoS would be suitably surrounded by existing development to the north, west and south and areas within and in close proximity to the area already have planning permission.
- Development in the rural part of this sector beyond the town edge would significantly diminish the sense of place and local distinctiveness.
- The AoS is sufficiently distanced from the Conservation Area that represents the town's historic core to the west
- It may be possible to integrate renewable energy projects
- Bus links exist to the rail station from the High Street in Saffron Walden.
- There are a range of existing facilities in town which are suitably accessible by Ashdon Road to the north and Radwinter Road to the south
- The AoS is well related to existing town, and to housing developments with planning permission in the area
- Local primary schools would be accessible for parts of the area
- It should be acknowledged that the area offers comparably better access to the strategic road network than other AoSs.

Area of Search 10d - between Radwinter Road and Thaxted Road

Summary of Broad Sustainability Impacts

Potential issues to overcome:

- There may be some issues surrounding coalescence with Swards End dependant on scale.
- Development in the rural part of this sector would result in a loss of open arable farmland spilling out into open countryside beyond very clearly defined edges
- The whole of the area is classified as Grade 2 Agricultural Land
- There may be impacts on air quality levels, particularly in close proximity to the town's AQMA
- The area is distanced from the train station which may make walking a less viable option
- There would likely be pressures on the capacity of nearby schools resulting from the

further development in Saffron Walden, and also the capacity in nearby healthcare and primary healthcare facilities

Likely benefits:

- The AoS will be sufficiently distanced from wildlife designations
- The AoS would be suitably surrounded by existing development to the west and planning permissions exist in the area
- There are no known constraints regarding historic designations and their settings. The AoS is sufficiently distanced from the Conservation Area that represents the town's historic core to the west
- It may be possible to integrate renewable energy projects.
- There are no known constraints regarding fluvial flooding in the area
- There are a range of existing facilities in town which are suitably accessible by Radwinter Road to the north and Thaxted Road to the south
- Bus links exist to the rail station from the High Street in Saffron Walden and access to the train station could direct traffic through existing residential areas to avoid the town centre
- There is a large food store in the northern part of the area and a discount store at the southern end of the area.
- The Local Plan inspector (for the withdrawn Local Plan 2014) concluded that the allocation was 'strategically sound', subject to reassurances about a link road between Radwinter Road and Thaxted Road
- The AoS is well related to existing housing development in the south although largely separated from existing housing development to the north west with the presence of employment land
- The potential yield of the area in terms of dwellings could be expected to meet thresholds for a new primary school due to its broad size although it should be noted that planning permission exists on Land South Of Radwinter Road for development including the provision of land for a one form entry primary school. Existing local primary schools would additionally be accessible for the western parts of the area.
- The AoS would be in close proximity to employment land to the east of the existing town area and adjoin them in western parts.

Area of Search 10e - between Thaxted Road and Debden Road

Summary of Broad Sustainability Impacts

Potential issues to overcome:

- A Special Verge with LoWS status exists along Debden Road in the south west.
- development in the rural part of this sector would result in a loss of open arable farmland spilling out into open countryside beyond very clearly defined edges. In broad summary it is considered development in this sector would significantly diminish the sense of place and local distinctiveness of this part of Saffron Walden.
- The whole of the area is classified as Grade 2 Agricultural Land
- There may be impacts on air quality levels, particularly in close proximity to the town's

AQMA

- The area is distanced from the train station which may make walking a less viable option.
- There would likely be pressures on the capacity of nearby schools resulting from the further development in Saffron Walden, and also the capacity in nearby healthcare and primary healthcare facilities
- The suitability of employment land in this area would largely depend on compatibility with the existing constraints regarding the landscape and neighbouring uses to the west

Likely benefits:

- There are no known constraints regarding historic designations and their settings. The AoS is sufficiently distanced from the Conservation Area that corresponds to the town's historic core to the west
- It may be possible to integrate renewable energy projects
- There are no identified constraints regarding fluvial flooding in the area
- Bus links exist to the rail station from the High Street in Saffron Walden and access to the train station could direct traffic through existing residential areas to avoid the town centre
- There are a range of existing facilities in town which are suitably accessible by Thaxted Road to the north east and Debden Road in the south west
- Herbert's Farm playing Fields are located within the area and the Lord Butler Leisure Centre exists adjacent to the area in the north west. The area's history in regards to the previous withdrawn Local Plan allocation of recreational land would be supported in line with those that already exist adjacent to the site
- The AoS is well related to existing housing development in the north west although there is separation due to the playing fields and leisure centre land
- The potential yield of the area in terms of dwellings would be expected to meet thresholds for a new primary school. Existing local primary schools would be accessible for the western parts of the area.

Area of Search 10f - between Debden Road and Newport Road

Summary of Broad Sustainability Impacts

Potential issues to overcome:

- A Special Verge with LoWS status exists along Debden Road to the east of the area
- There would be a loss of agricultural land, with urban development on a visually prominent slope onto rolling arable farmland of considerable visual quality. This would result in the loss of a rural approach road to the town. Development in this sector would significantly diminish the sense of place and local distinctiveness of this part of Saffron Walden.
- The majority of the area is classified as Grade 2 Agricultural Land
- Shortgrove Park Registered Historic Park lies outside the area of search to the south and development would have to be sensitive to its setting

- It is possible that the landscape implications and historic environment constraints may render some renewable energy schemes unsuitable
- There may be impacts on air quality levels, particularly in close proximity to the town's AQMA
- The west of the area is within Flood Risk Zone 3 and development would have to be suitably distanced from this zone
- The AoS is well related to existing housing development in the north although there is separation which may have access implications
- There may be some degree of perceived coalescence with Wendens Ambo and expansion would reduce the strategic gap between the town and Shortgrove Park
- There would likely be pressures on the capacity of nearby schools resulting from the further development in Saffron Walden, and also the capacity in nearby healthcare and primary healthcare facilities
- The suitability of employment land in this area would largely depend on compatibility with the existing constraints regarding the landscape and the surrounding historic asset designations. This may limit the suitability of particular use classes.

Likely benefits:

- The AoS is sufficiently distanced from the Conservation Area that represents the town's historic core to the west
- This AoS would effectively be serviced by Audley End station and offers a broadly accessible route to the train station along Newport Road which could avoid existing residential areas and the town centre
- Bus links exist to the rail station from the High Street in Saffron Walden
- There are a range of existing facilities in town which are suitably accessible by Debden Road to the east and Newport Road to the west
- The area has comparably good access to County High School in the north west

Area of Search 10g - between Newport Road and Audley End Road

Summary of Broad Sustainability Impacts

Potential issues to overcome:

- There would be a loss of agricultural land, with urban development on a visually prominent slope onto rolling arable farmland of considerable visual quality. This would result in the loss of a rural approach road to the town. In broad summary it is considered development in this sector would significantly diminish the sense of place and local distinctiveness of this part of Saffron Walden
- A large part of the area is classified as Grade 2 Agricultural Land
- There are likely to be negative impacts associated with Audley Park (a Registered Park and Garden) to the west and north and also the Scheduled Monument that is Audley End House through development within this AoS
- It is possible that the landscape implications and historic environment constraints may render some renewable energy schemes unsuitable
- There may be impacts on air quality levels, particularly in close proximity to the town's

AQMA

- The AoS contains a stretch of land within Flood Risk Zone 3 from the north west to the south east
- The site would not be well connected to existing housing development, with the presence of the County High School to the north east and the western part of the area would be adjacent to a Historic Park and Garden with no additional scope for expansion.
- There may be some degree of perceived coalescence with Wendens Ambo
- There would likely be pressures on the capacity of nearby schools resulting from the further development in Saffron Walden, and also the capacity in nearby healthcare and primary healthcare facilities
- The suitability of employment land in this area would largely depend on compatibility with the existing constraints regarding the landscape and the surrounding historic asset designations. This may limit the suitability of particular use classes.

Likely benefits:

- The majority of this AoS will be sufficiently distanced from wildlife designations
- This AoS would effectively be serviced by Audley End station and offers a broadly accessible route to the train station along Newport or Wenden Road which could avoid existing residential areas and the town centre.
- Bus links also exist to the rail station from the High Street in Saffron Walden.
- There are a range of existing facilities in town which are suitably accessible by Audley End Road to the north, Wenden Road through the centre of the area and Newport Road to the south east.
- The area has good access to County High School in the north east.

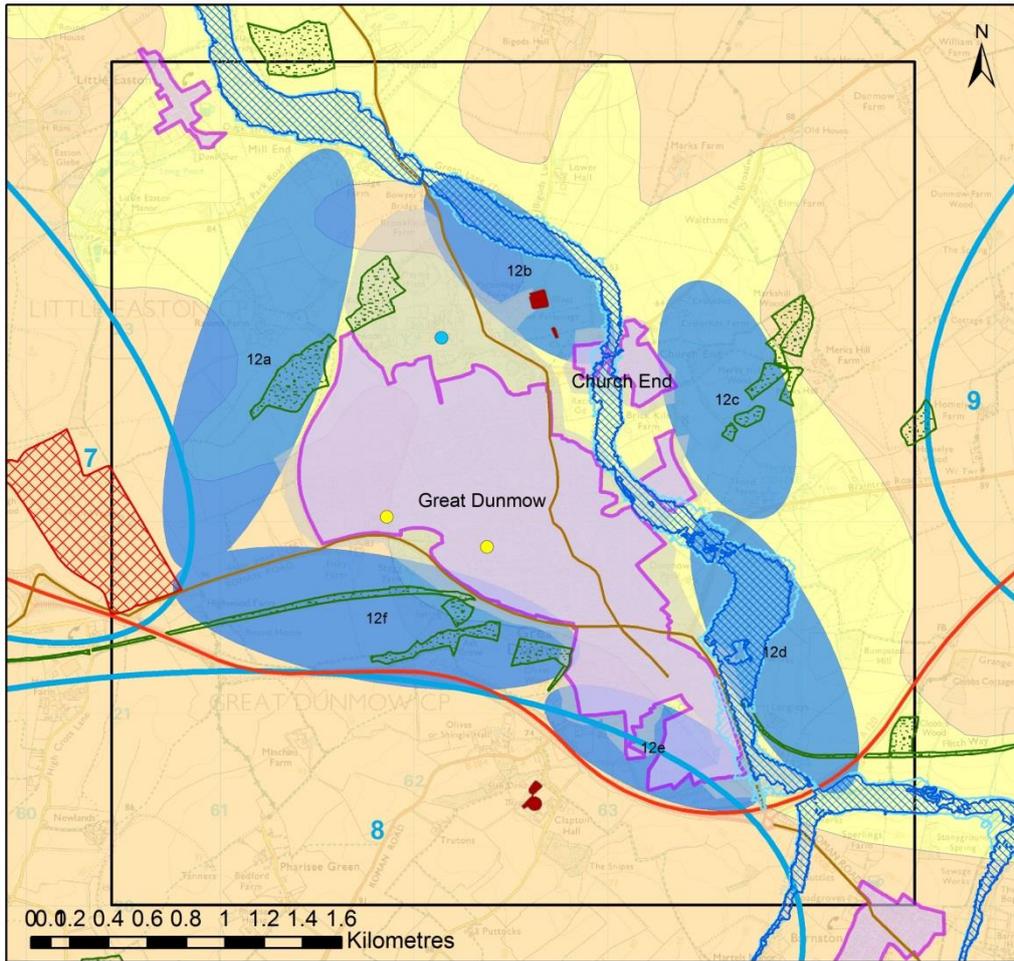
Great Dunmow

A total of six Areas of Search around the town have been explored. Potential sites within the town will additionally be considered through the Strategic Housing Land Availability Assessment (SHLAA). It should be noted that the area between Church End and Great Dunmow comprises a recreation ground and protected area of open space and is not included within any areas of search.

These areas of search are:

- Area of Search 12a between the A120 junction with the Stortford Road and Mill End
- Area of Search 12b to the north of Great Dunmow in the Chelmer Valley as far as Church End
- Area of Search 12c in the area beyond St Edmunds Lane
- Area of Search 12d between Braintree Road and the A120
- Area of Search 12e to the south of Ongar Road and north of the A120
- Area of Search 12f between the A120 and the B1256 Stortford Road

The following map looks at the broad constraints of these areas and the corresponding sub-sections respond to an appraisal of the sustainability implications of development in these locations.



Legend

● Railway Station	▭ Adopted Development Limits	▨ Greenbelt
● Primary School	▭ Countryside Protection Zone	▨ Grade 1 Agricultural Land
● Secondary School	▭ Development Areas 2015	▨ Grade 2 Agricultural Land
▨ Flood Risk Zone 3	▭ Built Up Areas	▨ Grade 3 Agricultural Land
▨ Flood Risk Zone 2	▭ Key Villages	▨ Grade 4 Agricultural Land
▨ Registered Parks and Gardens	▭ New Settlement AoS	▨ Grade 5 Agricultural Land
▨ Scheduled Monuments	▭ Public Safety Zones	▨ B Road
▨ LoWS - Local Wildlife Site	▭ Towns AoS	▨ A Road
▨ SSSIs	▭ Villages	▨ Motorway
▭ Airport Noise Contours		▨ Railway

© Crown copyright. All rights reserved. Essex County Council 100019602, 2015

**Area of Search 12a - between the A120 junction with the Stortford Road and Mill End
Summary of Broad Sustainability Impacts**

Potential issues to overcome:

- There is a SSSI to the south west of the area and Hoglands Wood LoWS is located within the area

- There may be some coalescence with Little Easton
- Development in this area would diminish the sense of place and local distinctiveness of Great Dunmow, however it is possible that this statement [from the Historic Settlement Character Assessment (August 2007)] may now not be as valid in consideration of the permissions since 2007 and the fact that the precedent for development in the broad area has already been established.
- A large part of the area is classified as Grade 2 Agricultural Land
- The area is adjacent to Ancient Woodland to the east which may restrict development or access to the site from the B184.
- There is no rail link in Great Dunmow
- There would likely be pressures on the capacity of nearby schools resulting from further development in Great Dunmow, and also the capacity in nearby healthcare and primary healthcare facilities

Likely benefits:

- There will be no significant landscape implications in this area and less than other areas surrounding Great Dunmow,
- The AoS is sufficiently distanced from the Conservation Area that represents the town's historic core
- It may be possible to integrate renewable energy projects
- There are no identified constraints regarding fluvial flooding within the area. Although the northern part of the site adjacent to Duck Street is in close proximity to Flood Zone 3
- The town centre is suitably distanced to be accessible by walking and cycling provided sufficient crossing opportunities exist or are integrated on the recently constructed Woodside Way.
- The area is well served by the strategic road network (A120) to the south.
- Bus links exist to and from the centre of Great Dunmow.
- The site would be served by Woodside Way, a recently constructed direct road link between the north and west sides of the town.
- The site would be broadly suitable for an increase in employment land; however any allocation would have to be compatible with the proposals of the existing permissions for housing development in the wider area

Area of Search 12b - to the north of Great Dunmow in the Chelmer Valley as far as Church End
Summary of Broad Sustainability Impacts

Potential issues to overcome:

- There may be landscape impacts associated with the possibility of coalescence with Church End
- A large urban extension here would further diminish the separate characteristics of this small discreet community and that development could detrimentally affect the impact of the landmark tower of St Mary's church from some vantage points
- A large part of the area is classified as Grade 2 Agricultural Land

- There are two Scheduled Monuments (associated with Parsonage Farm moated site) within the area
- There is a Conservation Area at Church End that falls within the area of search to the south east.
- It is possible that the landscape implications and historic environment constraints may render some renewable energy schemes unsuitable
- There may be some implications surrounding water quality due to the close proximity of the River Chelmer in the north.
- Development of the area would likely see access to the strategic road network (A120) to the south be directed through the town centre or via St Edmunds Lane
- There is no rail link in Great Dunmow
- The AoS is detracted from existing housing areas in the town and has sufficient constraints in the form of the Scheduled Monument (and its setting), the Conservation Area and the River Chelmer
- There would likely be pressures on the capacity of nearby schools resulting from further development in Great Dunmow, and also the capacity in nearby healthcare and primary healthcare facilities
- The AoS is detracted from existing employment areas in the town

Likely benefits:

- This AoS will be sufficiently distanced from wildlife designations
- The town centre is suitably distanced to be accessible by walking and cycling
- Bus links exist to and from the centre of Great Dunmow

Area of Search 12c - in the area beyond St Edmunds Lane

Summary of Broad Sustainability Impacts

Potential issues to overcome:

- A number of LoWSs fall within the area of search
- The principal effect of development would be to extend urban development onto highly visible and open rising farmland and introduce an extended urban settlement in close proximity to a small community with a separate identity
- There may be some implications surrounding water quality due to a reservoir and a number of water bodies on site associated with the LoWS and historic mineral working
- Development of the area would likely see access to the strategic road network (A120) to the south be directed through parts of the existing town area
- There is no rail link in Great Dunmow.
- The AoS is detracted from existing housing areas in the wider town area and would be constrained by the LoWS forming a large part of the site. Any large scale development of housing in this area could therefore be viewed as new settlement options
- There would likely be pressures on the capacity of nearby schools resulting from further development in Great Dunmow, and also the capacity in nearby healthcare and primary healthcare facilities

- The detracted nature of the area would likely require a number of infrastructure improvements beyond expansion of those that already exist in Great Dunmow.
- The AoS is detracted from existing employment areas in the town. The location of the area and presence of the LoWS could mean that the area would not be suitable for many new employment uses

Likely benefits:

- The area is within Grade 3 Agricultural Land
- There are no significant constraints to development within the area regarding the historic environment. The Church End Conservation Area is within close proximity to the north western part of the area; however it is considered that there is sufficient separation so as not to prevent development in this broad area
- It may be possible to integrate renewable energy projects
- The town centre is capable of being accessible by walking and cycling with necessary improvements and suitable links
- Bus links exist to and from the centre of Great Dunmow
- The developable parts of the area would likely require a housing yield that would meet thresholds for a new primary school due to the area being distanced from existing schools

Area of Search 12d - between Braintree Road and the A120

Summary of Broad Sustainability Impacts

Potential issues to overcome:

- The Flitch Way LoWS lies to the southern end of the area, however no other constraints exist
- the principal effect of development in this location would be to extend the urban area onto open elevated arable farmland resulting in the loss of open land. It summarises that development in this area would diminish the sense of place and local distinctiveness of the settlement.
- It is possible that the landscape implications may render some renewable energy schemes unsuitable.
- The River Chelmer runs through the area from north to south and as such a significant proportion of the area is within Flood Risk Zone 3.
- The town centre is suitably distanced to be accessible by walking and cycling although a barrier exists in the form of Dunmow Park which is in private ownership
- There is no rail link in Great Dunmow.
- The AoS is detracted from existing housing areas in the town area and would be constrained by the private Dunmow Park to the north west and employment land to the south west
- There would likely be pressures on the capacity of nearby schools resulting from further development in Great Dunmow, and also the capacity in nearby healthcare and primary healthcare facilities. The detracted nature of the area would likely require a number of infrastructure improvements beyond expansion of those that already exist in Great Dunmow.

Likely benefits:

- The area is within Grade 3 Agricultural Land
- There are no significant constraints to development within the area regarding the historic environment
- Development of the area would see access to the strategic road network (A120) to the south without any associated impacts on the existing town
- Bus links exist to and from the centre of Great Dunmow
- There are a range of existing facilities in the town centre which would theoretically be accessible if suitable links were provided as part of any development
- The developable parts of the area would likely require a housing yield that would meet thresholds for a new primary school due to the area being distanced from existing schools
- The southern parts of the AoS would be in close proximity to employment land to the west. This southern area would be broadly suitable for employment land provision in this regard and in addition to links to the A120

Area of Search 12e - to the south of Ongar Road and north of the A120

Summary of Broad Sustainability Impacts

Potential issues to overcome:

- The area incorporates Hoblongs Brook to the south, but is otherwise free from any constraints. A LoWS exists to, but not within, the north west of the area
- A large part of the area is classified as Grade 2 Agricultural Land
- There is a waste transfer station within the area which is allocated within the County Council's emerging Waste Local Plan which may have some perceived incompatibilities with housing development in close proximity however would be suitably compatible with neighbouring employment uses
- The area is relatively far away from the town centre which would affect accessibility by walking and cycling although would presumably be accessible by public transport if suitably linked to existing housing development to the north
- There is no rail link in Great Dunmow.
- The scale of development possible, factoring in existing permissions, would be unlikely however to deliver a significant amount of housing and affordable units.
- There would likely be pressures on the capacity of nearby schools resulting from further development in Great Dunmow, and also the capacity in nearby healthcare and primary healthcare facilities
- The site is distanced from existing schools and it is uncertain whether any housing yield on new allocations would meet thresholds for a new primary school

Likely benefits:

- It is considered that development could be introduced into this area to improve the sense of place and local distinctiveness of the settlement
- There are no significant constraints regarding the historic environment within this area of search

- It may be possible to integrate renewable energy projects
- The area is relatively free from flood risk constraints
- Development of the area would see access to the strategic road network (A120) to the south without any associated impacts on the existing town
- Bus links exist to and from the centre of Great Dunmow
- The area would be well connected to existing housing development and permissions for future housing growth and would also form a suitable infill of land between the existing town and the A120
- The nature of the area would be unlikely to require significant infrastructure improvements to those that already exist in Great Dunmow
- The eastern parts of the AoS would adjoin employment land to the east. This eastern area would be broadly suitable for employment land provision in this regard and in addition to links to the A120

Area of Search 12f - between the A120 and the B1256 Stortford Road

Summary of Broad Sustainability Impacts

Potential issues to overcome:

- The area would be in close proximity to a SSSI (High Wood, Dunmow) to the west and it may be that parts of the area are not compatible with this designation should there be any associated risk to its condition. The Flitch Way also runs through the site from west to east. A significant proportion of the eastern half of the site contains a number of large LoWSs.
- There will be negative landscape implications associated with the Flitch Way, the presence of LoWSs and the area's generally high sensitivity to change
- The principal effect of large scale development in this location would be the urbanisation and consequent loss of a diverse natural landscape with a rich and varied ecology. Additionally and unless extensive landscaping were undertaken some development would inevitably be visible from the A120 extending built form into what is presently open countryside. Development in this sector would significantly diminish the sense of place and local distinctiveness of the settlement
- The majority of the area is classified as Grade 2 Agricultural Land
- It is possible that the landscape implications may render some renewable energy schemes unsuitable.
- There is no rail link in Great Dunmow.
- The site is in close proximity to the existing town and housing developments however would be isolated from these due to the presence of the B1256
- There would likely be pressures on the capacity of nearby schools resulting from further development in Great Dunmow, and also the capacity in nearby healthcare and primary healthcare facilities. The environmental constraints of developing the land would also apply to necessary infrastructure delivery.
- It would be uncertain whether any housing yield on new allocations would meet thresholds for a new primary school.
- Although benefitting from good links to the A120, the AoS is detracted from existing

employment areas in the town. The location of the area and presence of numerous environmental constraints could mean that the area would not be suitable for employment in many use classes.

Likely benefits:

- There are no significant historic environment constraints on the site that would be a barrier to development
- There are no areas at risk from fluvial flooding within this AoS
- The town centre is capable of being accessible by walking and cycling with necessary improvements and suitable links
- Development of the area would see access to the strategic road network (A120) to the south without any associated impacts on the existing town
- Bus links exist to and from the centre of Great Dunmow
- A number of existing schools are located to the north of the area and the B1256

Edge of Bishop's Stortford

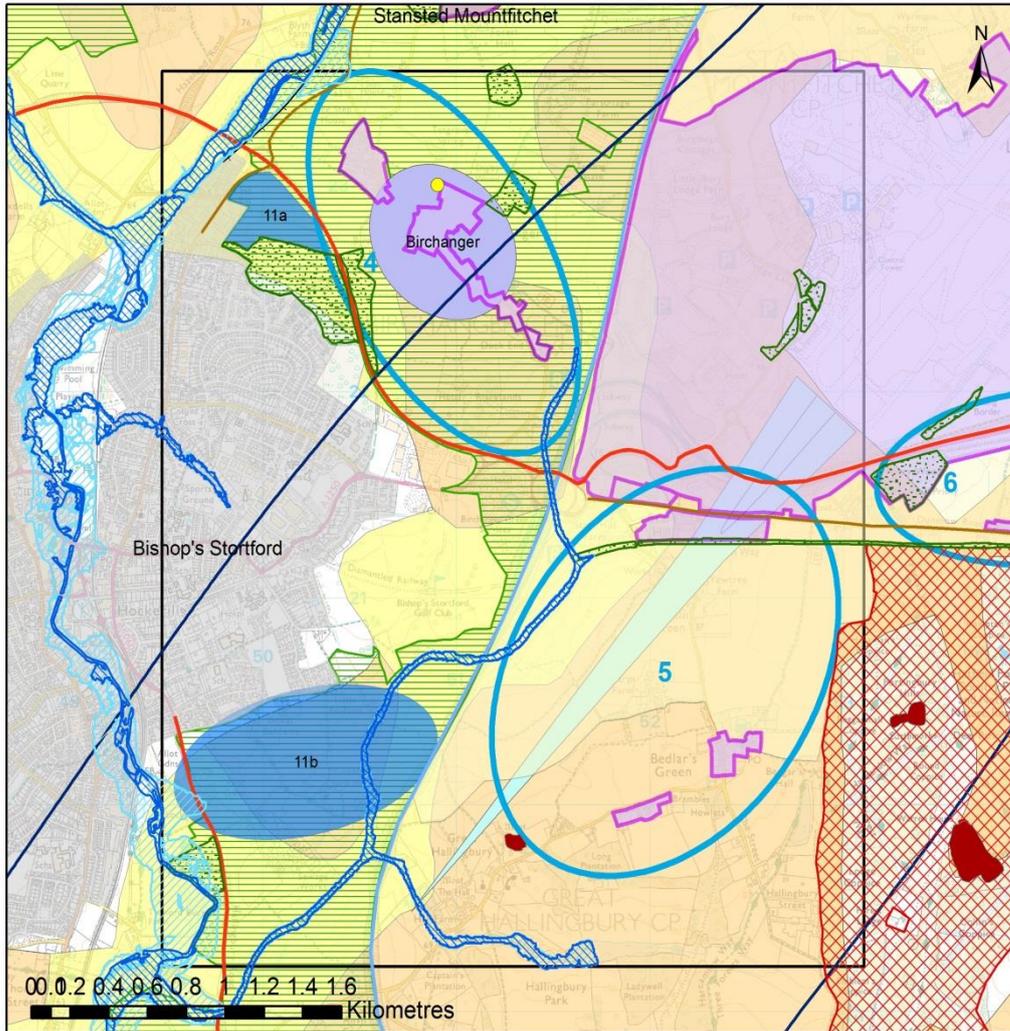
A total of two areas of search were identified on the edge of Bishop's Stortford within Uttlesford District. Both are within the designated Green Belt. Uttlesford District Council state that *'an assessment should be carried out to assess the performance of the Uttlesford Green Belt against the five purposes of the Green Belt as set out in the NPPF (Paragraph 80). Following this, as part of work on the overall development strategy, the Council will need to make a decision about whether the exceptional circumstances exist (taking account of strategic considerations in the round) to merit release of any Green Belt. Close working with East Hertfordshire District Council will be required to assess these areas of search and to ensure that the requirements of the Duty to Co-Operate are met.'*

These areas of search are:

- Area of Search 11a between the Stansted Road industrial estate in Bishop's Stortford and the A120 town bypass
- Area of Search 11b to the south of Beldams Lane in Bishop's Stortford

The following map looks at the broad constraints of these areas and the corresponding sub-sections respond to an appraisal of the sustainability implications of development in these locations.

Figure 3: Constraints Map – Area of Search 11: Urban Extensions on the edge of Bishop's Stortford



Legend

- | | | |
|--------------------------------|-------------------------------|-----------------------------|
| ● Railway Station | ▭ Adopted Development Limits | ▨ Greenbelt |
| ● Primary School | ▭ Countryside Protection Zone | ▨ Grade 1 Agricultural Land |
| ● Secondary School | ▭ Development Areas 2015 | ▨ Grade 2 Agricultural Land |
| ▨ Flood Risk Zone 3 | ▨ Built Up Areas | ▨ Grade 3 Agricultural Land |
| ▨ Flood Risk Zone 2 | ▨ Key Villages | ▨ Grade 4 Agricultural Land |
| ▨ Registered Parks and Gardens | ▭ New Settlement AoS | ▨ Grade 5 Agricultural Land |
| ▨ Scheduled Monuments | ▨ Public Safety Zones | — B Road |
| ▨ LoWS - Local Wildlife Site | ▨ Towns AoS | — A Road |
| ▨ SSSIs | ▨ Villages | — Motorway |
| ▭ Airport Noise Contours | | —+— Railway |

© Crown copyright. All rights reserved. Essex County Council 100019602, 2015

Area of Search 11a - between the Stansted Road industrial estate in Bishop's Stortford and the A120 town bypass

Summary of Broad Sustainability Impacts

Potential issues to overcome:

- The area is adjacent to Birchanger Wood LoWS to the south which forms the entirety of the area's southern boundary
- The area is within the Green Belt and would also diminish the strategic separation between Bishop's Stortford and Birchanger.
- The area would be adjacent to a LoWS and has relatively high sensitivity to change.
- When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed
- The area is isolated from existing communities due to the presence of the Birchanger Wood LoWS and would be located adjacent to Stansted Road industrial estate.
- There would likely be pressures on the capacity of nearby healthcare and primary healthcare facilities
- There would likely be pressures on the capacity of Birchanger School resulting from housing development in this area and there may be accessibility issues associated with crossing the A120

Likely benefits:

- The area is within Grade 3 Agricultural Land
- There are no significant historic environment designations within the area
- There are no flood risk constraints within this area
- The site is within close proximity to Bishop's Stortford and a range of public transport options which are accessible via Stansted Road to the west, including rail links at Bishop's Stortford Station
- The area is well connected and adjacent to Stansted Road industrial estate as well as the strategic road network for the benefit of any employment development

Area of Search 11b - to the south of Beldams Lane in Bishop's Stortford, and north of the Sewage Treatment works

Summary of Broad Sustainability Impacts

Potential issues to overcome:

- The area would border Rushy Mead Nature Reserve to the south west which is a designated LoWS as an important wetland
- The area is within the Green Belt, forms a strategic gap between Bishop's Stortford and the M11 to the east.
- The area has a relatively high sensitivity to change / development
- The majority of the area is classified as Grade 2 Agricultural Land
- When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to

demonstrate very special circumstances if projects are to proceed

- The area would be adjacent to a sewage works in the south, which may give rise to some nuisance or perceived pollution regarding such a facility in function.
- The majority of the area is free from any flood risk, however a small area at the western edge would be within Flood Risk Zone 2 and a similar area sized area to the east would be in Flood Risk Zone 3
- The site is in close proximity to strategic roads with the A120 to the north of the site and the M11 to the east; however the site would be distanced from necessary junctions and traffic would either be directed through the town of Bishop's Stortford. There is also no current access to the east of the M11 without going through the town.
- There would likely be pressures on the capacity of nearby healthcare and primary healthcare facilities
- There would likely be pressures on the capacity of Thorn Grove Primary School in Bishop's Stortford resulting from housing development in this area
- There may be some level of constraint regarding the suitability of employment development for some use classes due to the Rushy Mead Nature Reserve that borders the area to the south west

Likely benefits:

- There are no significant historic environment designations within the area
- The site is within close proximity to Bishop's Stortford and a range of public transport options which are accessible via Hallingbury Road to the west, including rail links at Bishop's Stortford Station
- The area would be relatively well connected to existing communities to the north.

Villages

Area of Search 13: Key Villages - village extensions/small sites of/within Elsenham, Great Chesterford, Hatfield Heath, Newport, Stansted Mountfitchet, Takeley, and Thaxted

Summary of Broad Sustainability Impacts

Potential issues to overcome:

- A number of SSSIs exist in the District that may be impacted on by new development at certain scales. SSSIs that may act as constraints to development in specific locations would be Elsenham Woods to the east of Elsenham, Debden Water to the east of Newport and Hatfield Forest to the west of Takeley.
- Hatfield Heath is in the Green Belt, as would be southern extensions of Stansted Mountfitchet
- The vast majority of the District is within Grade 2 Agricultural Land and this is expected to affect many potential expansions of the Key Villages within this Area of Search
- Scheduled Monuments are relatively prevalent around Great Chesterford which could affect any expansion in specific locations. Single instances of Scheduled Monuments being located in the broad areas of villages include within Hatfield Heath, Takeley and Stansted Mountfitchet.
- A number of the Key Villages are historic in origin and have centres that are protected under Conservation Area designation. Conservation Areas exist within the villages of Great Chesterford, Newport, Stansted Mountfitchet and Thaxted.
- It should be noted that for Hatfield Heath, elements of many renewable energy projects will comprise inappropriate development in the Green Belt. In such cases developers will need to demonstrate very special circumstances if projects are to proceed
- In Elsenham there are areas of flood risk to the south of the settlement; Great Chesterford is constrained to the north and south of the settlement by River Cam tributaries; Newport is similarly so to the north and east as is Stansted Mountfitchet to the northeast and south east. Thaxted has areas of flood risk to the west of the village.
- The Key Villages of Thaxted and Hatfield Heath are not well related to existing rail stations
- Any expansion of the key villages is likely to put pressure on local healthcare facilities and other services. Development is likely to require a relatively large amount of infrastructure improvements given the generally rural nature of land outside existing development boundaries
- It is likely that any additional housing development within all of the Key Villages would put pressure on local school capacities, particularly primary schools. It would be uncertain whether any housing yield on new allocations, should they be proportionate to the scale of the existing settlement, would meet thresholds for new schools

Likely benefits:

- There are various biodiversity designations in and around the District's various Key Villages although none exist that would be detrimental to the overall principle of directing growth to any specific village.
- The principle of proportionate development in the key villages is broadly suitable due to their dispersal across the District and there should not be any cumulatively significant

impacts on the wider landscape as a result of development in any number of these villages.

- No Registered Parks and Gardens should act as constraints to expansion of any of the Key Villages, with the exception of Shortgrove Park which would be a constraint to the expansion of Newport.
- Takeley and Hatfield Heath are comparatively free from fluvial flood risk
- Rail access to London and Cambridge exists in the Key Villages of Great Chesterford, Newport, Stansted Mountfitchet and Elsenham and it should be noted that only those villages situated on the A120 and in proximity to the M11 junctions in the north and south of the District have ease of access
- Bus links exist in all the Key Villages
- There are generally a good level of local services and facilities in these villages commensurate to their designation as Key Villages in the settlement hierarchy
- With the exception of Thaxted, there is a general ease of access to the strategic road network
- As a Key Village located more centrally in the District; Thaxted serves an important purpose to support the wider rural area in more central and eastern parts of Uttlesford. Similarly does Hatfield Heath serve the south western part of the District.
- There is potential, in those Key Villages with accessibility to the A120 and M11, that small areas of expansion could be suitable for employment development dependant on specific location, type and compatibility with the character of the villages and highlighted constraints.

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

Summary of Broad Sustainability Impacts

Potential issues to overcome:

- A number of SSSIs exist in the District that may be impacted on by new development at certain scales. An SSSI that may act as a constraint to development in specific locations would be Quendon Wood to the east of Quendon and Rickling.
- Extensions to Little Hallingbury and Leaden Roding are likely to be in the Green Belt which would have restrictions to development in all but special circumstances
- The vast majority of the District is within Grade 2 Agricultural Land
- Scheduled Monuments are relatively prevalent around Chrishall which could affect any expansion in specific locations. Single instances of Scheduled Monuments being located in the broad areas of villages include within Ashdon, Great Sampford, Clavering, Henham, Great Easton, Stebbing, Little Hallingbury and Hatfield Broad Oak.
- A number of the Key Villages are historic in origin and have centres that are protected under Conservation Area designation. Conservation Areas exist within the majority of villages; Ashdon, Radwinter, Great Sampford, Quendon and Rickling, Henham, Manuden, Hazel End (within Farnham Parish), Great Easton, Stebbing, Felsted and Hatfield broad Oak. Two Conservation Areas exist in Clavering.
- It should be noted that for those extensions within the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed

- Development in a large number of villages is constrained by fluvial flood risk in certain locations and directions. These villages are Ashdon, Chrishall, Radwinter, Great Sampford, Clavering, Manuden, Great Easton, Stebbing, Flitch Green, Little Hallingbury and Hatfield Broad Oak.
- Bus links are poor in all the villages. Development on the edges of the villages should be proportionate to the scale of the settlement in order to maximise the possibility of walking and cycling into the centres for any local services.
- There are a varying but broadly medium-level of local services and facilities within the villages
- The majority of the Type A villages are remote from the strategic transport network, with the exceptions of Birchanger, Little Hallingbury and Leaden Roding.
- Any expansion of the villages is likely to put pressure on local healthcare facilities and other services
- It is likely that any additional housing development within all of the Key Villages would put pressure on local school capacities, particularly primary schools. It would be uncertain whether any housing yield on new allocations, should they be proportionate to the scale of the existing settlement, would meet thresholds for new schools.
- There is limited potential, given the villages' general accessibility for anything other than small scale rural employment opportunities

Likely benefits:

- There are various biodiversity designations in and around the District's Type A Villages although none exist that would be detrimental to the principle of directing growth to any specific village
- The principle of proportionate development in the key villages is broadly suitable due to their wide dispersal across the District and there should not be any cumulatively significant impacts on the wider landscape as a result of development in any number of these villages
- No Registered Parks and Gardens should act as constraints to expansion of any of the Type A Villages
- Villages largely free from fluvial flood risk are Wimbish, Debden, Quendon and Ricking, Henham, Farnham, Birchanger, Felsted and Leaden Roding.
- Rail access to London and Cambridge exists in the Key Villages of Great Chesterford, Newport, Stansted Mountfitchet and Elsenham and a few of the Type A Villages are in relatively close proximity to these; these being Quendon and Ricking (Newport station), Birchanger (Bishop's Stortford and Stansted Mountfitchet stations) and arguably Little Hallingbury (Bishop's Stortford station) and Clavering (Newport station).
- Given the fact that constraints exist throughout the District as a whole, including the towns of Saffron Walden and Great Dunmow, housing growth proportionate to the size of the settlements would have an important function in providing appropriate housing in the District and for this reason a level of growth to distribute housing throughout the District may be proven to be required

Summary of the Areas of Search appraisal

The SA at that time concluded that, focusing development to one or more new settlements is likely to have comparatively less constraints than extensions of existing settlements and villages, or perhaps more specifically, new settlements have better scope to mitigate negative impacts on site. There is also less of a threat of secondary and cumulative impacts on existing settlements where multiple extensions to existing settlements may be required to meet housing targets.

It is however likely that capacity for expansion exists in the surrounding areas of each of the towns and such a focus, if proportionate to the existing settlement and in mind of identified broad constraints, would contribute to meeting the existing and identified housing needs of the District. This will be particularly important in the earlier stages of the plan period.

Development of the Key Villages and Type A Villages will also meet this need, again if proportionate to each settlement and in mind of each's specific constraints. A number of villages contain rail links and this benefit, in a District that is not particularly well served by strategic roads or public transport due to its rural nature enhances the sustainability of development in these settlements pending other considerations.

The development of one or more new settlements would contribute to meeting future needs, again in consideration of known constraints in specific areas; broadly summarised as predominantly transport implications and suitable access to the strategic road network. Should suitable additional junctions or access to these strategic roads be forthcoming, development of the surrounding villages may become more sustainable in turn. This would similarly be the case for any new rail infrastructure in the District.

Strategic Scenarios

Three different levels of development were proposed in 2015. The first level, of 580 dwellings per year, was based on the comments of the Uttlesford Local Plan Inspector in his report on the (withdrawn) Submission Local Plan in December 2014.

The SA also explored a higher level of development for testing purposes. This was considered necessary in order to ensure that the plan has tested these implications and to ensure that the plan is properly justified. It was also important to test a higher level of growth in case of changes in population projections during the preparation of the plan. For these purposes the figure was assessed at 750dpa. The following scenarios were explored:

Scenarios A to D (580 dwellings per year)

The following scenarios are based on an assumed level of growth at 580 dwellings per year. Extant permissions granted for around 5,000 dwellings are common to all options. A windfall allowance of 50 dwellings per year or 750 over 15 years has been made. This approach was endorsed by the Local Plan inspector in his report of December 2014.

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

	Scenario A	Scenario B	Scenario C	Scenario D
Location	New Settlement	Villages and BS	Towns	Hybrid
Extant Permissions	5,000	5,000	5,000	5,000
Windfall allowance	750	750	750	750
Edge of Bishop's Stortford	0	500	0	500
Great Dunmow	0	0	1,500	500
Saffron Walden	0	0	1,500	500
Key Villages	0	1,500	0	500
Type A Villages	0	1,000	0	500
New Settlement	3,000	0	0	500
TOTAL	8,750	8,750	8,750	8,750

A summary of the appraisal of each Scenario can be found in the corresponding sub-sections.

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

Summary of potential issues to overcome:

- It may be likely that any mitigation or potential remedial work could hinder the assumed delivery rate of 300 dwellings per year and affect the maintenance of a 5 year housing supply throughout the plan period.
- It is likely that there would be negative impacts on the landscape associated with the growth of Greenfield land although it should be acknowledged that such issues will be inevitable under all scenarios.
- Scenario A would likely have some negative impacts associated with sustainable and inclusive housing growth in the District, through a focus on a single settlement. The scenario would not meet the needs that exist within individual established settlements,

including a delivery of a mix of housing to support demographic evidence and affordability, as well as catering for socio-economic factors and migration to such settlements for which we can assume the SHMA figures will be partly based.

- This assumed delivery rate is substantially below the 580 per year endorsed by the Local Plan inspector in the examination of the withdrawn Local Plan in 2014. The target of 580 dwellings per annum would not be achievable in the latter stages of the plan period assuming extant permissions and windfall sites have been developed to meet this target prior to the new settlement being developed (from the above assumption this would be in 2023).
- There would be interim uncertainties as to the capacity of existing infrastructure in the settlement's wider location that may have to support initial phases of housing delivery.

Summary of likely benefits:

- There are likely to be minimal cumulative impacts on ecology under this scenario with the potential for them to be mitigated maximised in a single scheme.
- It is likely to be the case that a focus on a new settlement would have less cumulative environmental impacts than a more dispersed distribution.
- A new settlement of 10,000 homes has the ability to be built in accordance with high quality design features and 'garden settlement' principles.
- The required scale would maximise the potential of wider gains in terms of serving existing communities, with unavoidable negative environmental impacts associated with greenfield development isolated to a single location.
- The focus on a new settlement would alleviate the development pressures on the District's largely historic towns and villages.
- It is likely to be the case that a focus on a new settlement would have less cumulative environmental impacts than a more dispersed distribution, and the scale would maximise the possibility for, and viability of, the inclusion of renewable energy sources within the proposal.
- The scale of a new settlement would reduce the likelihood of flood risk being a significant constraint, due to the possibility of developing in areas of Flood Zone 1 and / or factoring waterbodies into the design of development.
- Dependant on location to the strategic road and rail network and also the distance to existing settlements, a focus on a single new settlement would maximise the possibility of supporting sustainable transport methods to be fully integrated, based on an assumption that a range of services and facilities, including new schools and employment opportunities would form part of the development.
- The focus on a single new settlement and its possible scale would likely ensure that supporting open space and recreational facilities would be viable as part of the wider development. It is also possible that new healthcare facilities would be provided. This would likely offer benefits to the wider communities of surrounding existing villages.
- A focus on a new settlement will offer the largest possibility of sustainable self-contained development to be delivered and the broad assessment of those areas explored earlier in this report suggest that a number could be viable. A new settlement of 10,000 homes by the end of the next plan-period would require supporting infrastructure of a commensurate scale and has the ability to be built in accordance with high quality design features and 'garden settlement' principles.

- This scenario would maximise the possibility of primary and secondary schools to be delivered on site.
- The focus on a new settlement will offer the largest possibility of sustainable self-contained development to be delivered, including the development of employment opportunities on site.

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

Summary of potential issues to overcome:

- The cumulative impacts of allocations in the District's Villages, in addition to any extant permissions and windfall sites within them, would likely have locally significant impacts on a number of environmental sustainability objectives, including biodiversity. There is a possibility that this could also extend to the water environment in the District, with dispersal potentially affecting a larger number of water bodies than a reliance on fewer larger development allocations that have enhanced potential to mitigate any impacts on site.
- Cumulatively, dispersal to the District's Villages at the scale required could be seen to have negative impacts on green infrastructure and networks generally throughout the District.
- There are also likely to be Green Belt implications that may limit growth in some villages. This in turn may exacerbate issues in other villages, which would presumably have to accommodate more than proportionate growth.
- There would be a large amount of isolated and potentially cumulatively significant impacts on landscape in a number of the District's villages. It is likely that landscape constraints and coalescence issues will exist within large areas of land contiguous with village development boundaries and it will be difficult to consistently determine which pressures are more acceptable than others in the allocation of land in all villages and in consideration of their unique characteristics.
- It is possible that a significantly lower proportion of previously developed land will be developed than if a proportion of growth was directed to the District's existing towns.
- Development under this scenario is unlikely to respond well to the sustainable use of land, where density requirements are likely to be lower than development under other scenarios with one or more larger allocations. This in turn may have viability issues surrounding the delivery of a mix of housing without increasing the scales of development with resulting associated impacts on the environment.
- Dispersal to the District's Villages at the scale required would have a strong possibility of negative impacts on numerous cultural heritage assets located in historic settlements. Conservation Areas exist in the majority of the District's Villages and numerous have Scheduled Monuments located in close proximity.
- A potential secondary impact of this scenario could be a disproportionate amount of growth dispersed to some Villages with fewer constraints.
- The scale of developments in each Village and the focus on a larger number of small allocations would reduce the possibility for, and viability of, the inclusion of renewable energy sources within proposals.
- The ability to mitigate, or for proposals to be designed to factor in areas that have a risk of flooding, would be less viable than in larger scale allocations.
- These settlements, aside from those that have links to the strategic rail network, currently have poor public transport services and a small amount of services and facilities in walking and cycling distance.
- It can be expected that the expected scale of development distributed to each Village would not be sufficient to meet thresholds for accompanying services, facilities and infrastructure to be provided. It is also unlikely that public transport providers would

extend services to more remote parts of the District.

- Rail links only exist in the settlements of Stansted Mountfitchet, Elsenham, Newport, Wendens Ambo and Great Chesterford.
- This dispersal would not be without a number of significant social implications, particular regarding the cohesion of existing villages and any forthcoming developments that could potentially correspond to their significant expansion.
- The scenario is unlikely, as a spatial strategy, to meet future needs and requirements in the District beyond the plan period. With this in mind it would be likely that a new settlement would be required in the next 15-year plan period.
- There will likely be pressure on local infrastructure and schools, with a potential scenario of no single development being of the scale to meet infrastructure thresholds or ensure their viability.
- It is unlikely that any single development, or cumulative amount of growth in any one settlement under this scenario, would stimulate the need for additional schools to be provided. It would also be uncertain at this stage whether expansion of any existing schools would be viable.
- Under this scenario it would be difficult to ensure the allocation and delivery of employment development in the District strategically in terms of suitability, and also in reflection of existing jobs and a desire to minimise travelling distances.
- It is likely that there would exist a situation where those Villages in closer proximity to existing employment opportunities would be vastly more sustainable than those that are more isolated.

Summary of likely benefits:

- This dispersal scenario may limit the significance of any loss of the best and most versatile agricultural land in the District, should development proposals be appropriate at a smaller scale commensurate with acceptable expansion of existing settlements.
- A focus on the District's villages with development also being located on the edge of Bishop's Stortford would offer a dispersed distribution of development. This would respond well to meeting the District's identified existing housing needs.
- The allocation of growth on the edge of Bishop's Stortford, but within the District of Uttlesford, can be seen as a generally sustainable approach should allocations be proportionate and suitable in accumulation with any permissions and growth identified in Bishop's Stortford in the East Hertfordshire Local Plan and meet Green Belt requirements.

Scenario C: Focus on Towns (580 per year)

Summary of potential issues to overcome:

- There are a number of Local Wildlife Sites and one SSSI surrounding Great Dunmow, which may limit the suitability of extensions in certain locations. In contrast, Saffron Walden has comparatively minimal constraints in this regard.
- Regarding water quality there is the potential for negative cumulative effects arising from a number of urban extensions in the same town. This may arise, for example, to the east of Great Dunmow, where extensions could be located in the Upper Chelmer River Valley, and to the south of Saffron Walden regarding the Fulfen Slade.
- This scenario would largely have negative landscape implications, where it can be assumed that a significant proportion of development directed to the towns would have to be accommodated through one or a number of relatively large urban extensions. The cumulative impacts of these with extant permissions, particularly to the west of Great Dunmow would be more significantly negative.
- Saffron Walden is surrounded by the best and most versatile soil in the District (Grade 2 Agricultural Land).
- Both Saffron Walden and Great Dunmow have historic cores protected as conservation areas and although development would be unlikely to be located within or adjacent to these designations, it is likely that there would be wider implications on character and potential loss of amenity through increased traffic to these centres for services.
- Specific to Saffron Walden, a significant constraint exists to the east with Audley End House and its registered historic park and garden.
- It should be noted that an AQMA exists in Saffron Walden and any impacts on air quality will be magnified in this regard.
- Great Dunmow does not have any significant constraints regarding air quality, however there is likely to be some degree of negative impact associated with growth at the specified scale in conjunction with the extant permissions to the west of the town.
- Flood Risk Zones 2 and 3 are both prevalent on the edge of both towns.
- Neither town has rail links within existing development boundaries; the nearest train station Saffron Walden can benefit from is Audley End station in Wendens Ambo, approximately a mile and a half from Saffron Walden to the south west.
- Significant growth would however likely exacerbate transport pressures in Saffron Walden.
- The distribution of growth would not extend to meeting those needs of more rural areas, which in the District also represents a significant proportion of the population.
- The distribution would be unlikely, as a spatial strategy, to meet future needs and requirements in the District beyond the plan period where further expansion of the towns should not be solely relied upon as a future strategy in line with existing constraints. With this in mind it would be likely that a new settlement would be required in the next 15-year plan period under this scenario.
- There are likely to be concerns however regarding infrastructure capacities, particularly in response to a significant amount of extant permissions and windfall sites being within and/or extensions of these settlements.
- Growth under this scenario would not stimulate the requirement for a new secondary

school in the District and should this be a desirable outcome as a result of growth in the Local Plan, it should be noted that this would only be viable under a new settlement scenario to meet the required threshold.

- There could be considered a discrepancy between provision in the towns and wider employment needs in the District. New employment opportunities should be well related to existing employment opportunities within the District in order for opportunities to be inclusive across a range of sectors.

Summary of likely benefits:

- It is possible that a significantly higher proportion of previously developed land could be developed under this scenario than other options.
- Development under this scenario is likely to respond well to the sustainable use of land, where density requirements are likely to be higher commensurate to urban locations.
- Great Dunmow is largely surrounded by Grade 3 Agricultural Land.
- It is possible that, supported by relevant infrastructure improvements, there would be less transport emissions resulting from expansion to the District's towns through accessibility to services.
- Both towns have a good range of services and facilities, including frequent bus services to and from their centres.
- Directing growth to the towns would correspond to the most socially inclusive scenario in that extensions to the existing settlements would benefit from the largest concentration of existing community facilities in the District commensurate to their status in the settlement hierarchy.
- Expansion of the towns at the scale specified would require additional provision of open space, recreation and healthcare facilities. It is possible that the provision of such facilities would benefit the existing communities, dependant on scale and accessibility.
- A focus on the District's towns would direct growth to the centres of the largest population, responding well to identified housing needs in the District.
- A focus on the District's main towns of Saffron Walden and Great Dunmow would see housing growth developed in what can be considered the District's most sustainable settlements in terms of existing infrastructure, jobs and services.
- It is probable that the amount of growth in both settlements under this scenario would stimulate the need for additional primary schools to be provided.
- The distribution of growth under this scenario would direct new housing to those settlements with existing secondary schools and their expansion would likely be required.
- This scenario would see employment provision directed to those settlements with the highest population in the District.

Scenario D: Hybrid Option 1 (580 per year)

Summary of potential issues to overcome:

- The impacts of dispersal as specified in this scenario would likely have negative impacts on a number of environmental sustainability objectives at the local and site specific level, including biodiversity. Cumulatively, dispersal at this level could be seen to have negative impacts on green infrastructure and networks generally throughout the District.
- There is a possibility that this could also extend to the water environment in the District, with dispersal potentially affecting a larger number of water bodies than a reliance on fewer larger development allocations that have enhanced potential to mitigate any impacts on site.
- There would be a relatively large amount of isolated and potentially cumulatively significant impacts on landscape in a number of the District's villages. There is a possibility that the distribution could lead to more significant impacts in those smaller settlements where development would represent a larger proportionate expansion, with less scope for allocating land for development in less sensitive locations in regard to landscape character.
- It would be difficult to consistently determine which landscape pressures are more acceptable than others in the allocation of land in all villages and in consideration of their unique characteristics.
- There are likely to be Green Belt implications that may limit growth in some villages. This in turn may exacerbate issues in other villages, which would presumably have to accommodate more than proportionate growth.
- Development under this scenario is unlikely to respond well to the sustainable use of land, with little supplementary benefits arising from any one development in the District.
- Conservation Areas exist in the majority of the District's villages and numerous have Scheduled Monuments located in close proximity.
- The scale of distribution and the focus on a larger number of small allocations would reduce the possibility for, and viability of, the inclusion of renewable energy sources within proposals.
- Should development at the existing towns be promoted in the form of a single urban extension in each instance, impacts relevant to pollution should also be considered in any selection criteria, particularly regarding the impact on the AQMA in Saffron Walden.
- The ability to mitigate, or for proposals to be designed to factor in areas that have a risk of flooding, would be more viable in larger scale allocations forming the new settlement element of the scenario, or any single large urban extension to meet the growth distribution on the District's towns.
- The villages, aside from those that have links to the strategic rail network, currently have poor public transport services and a small amount of services and facilities in walking and cycling distance. It can be expected that the expected scale of development distributed to each village would not be sufficient to meet thresholds for accompanying services, facilities and infrastructure to be provided. It is also unlikely that public transport providers would extend services to more remote parts of the District.
- It is uncertain at this stage what level of services and facilities could be expected from a new settlement at the specified scale, and the sustainability implications of this

scenario, would depend on any upper limit that this new settlement could eventually reach beyond the plan period.

- This dispersal would not be without a number of significant social implications, particular regarding the cohesion of existing villages and any forthcoming developments that could potentially correspond to their significant expansion under this scenario.
- It is possible that there will be significant localised pressure on existing healthcare facilities under this scenario, with potentially no single development being of a larger enough size to stimulate additional provision.
- There would be some concern however, whether such a distribution would be adequate to stimulate infrastructure improvements, particularly regarding schools and transport, with a potential scenario of no single allocated development being of the scale to meet infrastructure thresholds or ensure their viability in the plan period. The distribution of development is under the threshold for a new primary school to be provided to serve any new development.
- The distribution would not respond well to the location of existing employment opportunities in the District. This distribution scenario would also lead to difficulties in ensuring the allocation and delivery of employment development in the District strategically in terms of suitability, and also in reflection of existing jobs and a desire to minimise travelling distances.

Summary of likely benefits:

- This dispersal scenario may limit the significance of any loss of the best and most versatile agricultural land in the District, should development proposals be appropriate at a smaller scale commensurate with acceptable expansion of existing settlements.
- Although no rail links exist specifically at the towns, there are available a good existing level of services and facilities and public transport links exist in centres.
- The distribution of growth across the District would most likely be proportionate to the size of existing settlements should the scale and location of extant permissions and potential windfall sites additionally be considered. This ensures that new development has a reasonable level of accessibility to services.
- Distribution of development to the District's towns and to a new settlement would require open space and recreational provision that would be comparatively more easily delivered; particularly should development in the towns come forward as a single urban extension in each instance.
- The hybrid option of delivery would be seen as offering the most dispersed distribution of development of all the scenarios. This would respond well to meeting the District's identified existing housing needs.
- The start of a new settlement would seek to meet the future needs and requirements of the District.
- This hybrid scenario would respond well to the delivery rate of 580 dwellings per annum and adhere better to the maintenance of a 5 year housing supply over the plan period in the District than Scenario A; the only other Scenario that explores a new settlement at this delivery rate.

Scenarios E to G (750 dwellings per year)

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

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

Location	Scenario E	Scenario F	Scenario G
	Two new settlements	Towns and Villages	Hybrid 2
Extant Permissions	5,000	5,000	5,000
Windfall allowance	750	750	750
Edge of Bishop's Stortford	0	500	500
Great Dunmow	0	1,500	1,000
Saffron Walden	0	1,500	1,000
Key Villages	0	1,500	1,000
Type A Villages	0	1,000	1,000
New Settlement	6,000	0	1,500
TOTAL	11,750	11,750	11,750

The appraisal of each Scenario can be found in the corresponding sub-sections.

Scenario E: Two New Settlements

Summary of potential issues to overcome:

- It may be likely that any mitigation or potential remedial work could hinder the assumed delivery rate of 300 dwellings per year and affect the maintenance of a 5 year housing supply throughout the plan period.
- There would be negative impacts on the landscape associated with growth on Greenfield land. The difference in impact of two new settlements in landscape, rather than the development of one under Scenario A, would largely be dependent on location in regard to each other (these would be significantly increased should they both be located in the same landscape character area), and also in relation to the existing settlement pattern.
- It can be assumed that the likelihood of two new settlements being located within close proximity to the road and rail network would be minimal, unless one or more additional junctions to the M11 are provided.
- Scenario E would likely have some negative impacts associated with sustainable and inclusive housing growth in the District through a focus on two new settlements and no distribution towards existing settlements to meet their housing needs. This includes a delivery of a mix of housing to support demographic evidence and affordability, as well as catering for socio-economic factors and migration to such settlements for which we can assume the SHMA figures will be partly based.
- The target of 750 dwellings per annum would not be achievable in the latter stages of the plan period assuming extant permissions and windfall sites have been developed to

meet this target prior to the new settlement being developed. With windfalls continuing to be developed throughout the plan period, there would be a shortfall of 100 dwellings per annum under this scenario.

- There will be interim uncertainties as to the capacity of existing infrastructure in the settlement's wider location that may have to support initial phases of housing delivery.
- There would likely be a requirement for good accessibility to existing employment opportunities within the District in order for opportunities to be inclusive across a range of sectors, which could have implications on their location in regard to each other limiting the suitability of some broad locations.

Summary of likely benefits:

- It is possible however that a focus on two new settlements (if located suitable distanced from one another) would have less cumulative environmental impacts than a more dispersed distribution. Dependant on location, there are likely to be minimal cumulative impacts on ecology under this scenario with the potential for them to be mitigated maximised in a two large schemes.
- The scale would maximise the possibility for, and viability of, enhancement through mitigation. This is possible to the case regarding water quality. Site selection criteria should include the impacts on water bodies within the area, in response to those objectives set out in relevant River Basin Management Plans in response to the requirements of the Water Framework Directive.
- New settlements will have the ability to be built in accordance with high quality design features and 'garden settlement' principles.
- A focus on two new settlements would respond well to the notion of a sustainable use of land, provided the locations were sustainable in accordance with other sustainability objectives and site selection criteria. The required scale would maximise the potential of wider gains in terms of serving existing communities.
- The focus on two new settlements would greatly alleviate the development pressures on the District's largely historic towns and villages and, dependant on specific location, can be assumed to have comparatively positive impacts on the historic environment.
- It is likely to be the case that a focus on new settlements would have less cumulative environmental impacts including emissions and distances travelled to services than a more dispersed distribution, and the scale would maximise the possibility for, and viability of, the inclusion of renewable energy sources within the proposal.
- The scale of new settlements would reduce the likelihood of flood risk being a significant constraint, due to the possibility of developing in areas of Flood Zone 1 and / or factoring waterbodies into the design of development.
- The scale required of new settlements would maximise the possibility of supporting sustainable transport methods to be fully integrated, based on an assumption that a range of services and facilities, including new schools and employment opportunities would form part of the development.
- It is also possible that new healthcare facilities would be provided. This would likely offer benefits to the wider communities of surrounding existing villages and these would be significant should the location of the two new settlements sufficiently distanced to each other to serve an overall wider area.
- Scenario E will likely offer a better distribution of growth across the District than the single settlement scenario (A) dependant on their location in relation to each other.

- Dependant on the location of the two new settlements, there is potential for them to provide some needed infrastructure and services to the wider area, including any villages or towns that may reasonably be expected to fall within this. If the scale of the new settlements were to reach the potential 10,000 dwellings as specified in Scenario A then the settlements would meet the threshold for infrastructure requirements such as a new secondary school.
- The focus on two new settlements will offer a large possibility of sustainable self-contained developments to be delivered, including the development of employment opportunities on site.

Scenario F: Towns and Villages

Summary of potential issues to overcome:

- The cumulative impacts of allocations under this scenario, in addition to any extant permissions and windfall sites within the District, would likely have locally significant impacts on a number of environmental sustainability objectives, including biodiversity. Cumulatively, this level of dispersal at the scale required could be seen to have negative impacts on green infrastructure and networks generally throughout the District.
- There is a possibility that this could also extend to the water environment in the District, with dispersal potentially affecting a larger number of water bodies than a reliance on fewer larger development allocations that have enhanced potential to mitigate any impacts on site.
- There are a number of Local Wildlife Sites and one SSSI surrounding Great Dunmow, which may limit the suitability of extensions in certain locations.
- There are likely to be Green Belt implications that may limit growth in some villages. This in turn may exacerbate issues in other villages, which would presumably have to accommodate more than proportionate growth.
- There is the potential for negative impacts to be realised on water quality through the cumulative effects of a number of urban extensions in the same town. This may arise, for example, to the east of Great Dunmow, where extensions could be located in the Upper Chelmer River Valley, and to the south of Saffron Walden regarding the Fulfen Slade.
- There would be a large amount of isolated and potentially cumulatively significant impacts on landscape in a number of the District's villages and any extensions of the District's towns. Extensions to Bishop's Stortford would have significant implications regarding the restrictions of such development within the Green Belt, as well as a number of villages in the District.
- It is likely that landscape constraints and coalescence issues will exist and could be significant within large areas of land contiguous with development boundaries and it will be difficult to consistently determine which pressures are more acceptable than others in the allocation of land in all locations and in consideration of their unique characteristics.
- Assuming that a significant proportion of development directed to the towns would have to be accommodated through one or a number of relatively large urban extensions; the cumulative impacts with extant permissions, particularly to the west of Great Dunmow would be significantly negative.
- Development in the District's villages is unlikely to respond well to the sustainable use

of land, where density requirements are likely to be lower than development under other scenarios with one or more larger allocations. This in turn may have viability issues surrounding the delivery of a mix of housing without increasing the scales of development with resulting associated impacts on the environment.

- There would likely be significant negative impacts on the historic environment through development of the scale proposed in this Scenario. Both Saffron Walden and Great Dunmow have historic cores protected as conservation areas, numerous also exist in the District's villages, and although development would be unlikely to be located within or adjacent to these designations, it is likely that there would be wider implications on character and potential loss of amenity through increased traffic to these centres for services.
- Specific to Saffron Walden, a significant constraint exists to the east with Audley End House and its Registered Historic Park and Garden.
- Dispersal to the District's Villages at the scale required would have a strong possibility of negative impacts on numerous cultural heritage assets located in historic settlements. Conservation Areas exist in the majority of the District's Villages and numerous have Scheduled Monuments located in close proximity.
- It should be noted that an AQMA exists in Saffron Walden and air quality impacts will be magnified.
- The ability to mitigate, or for proposals to be designed to factor in areas that have a risk of flooding, would be less viable in smaller scale allocations.
- Mitigation of flood risk may affect housing densities should extensive mitigation be required.
- Neither town in the District has rail links within existing development boundaries; the nearest train station Saffron Walden can benefit from is Audley End station in Wendens Ambo, approximately a mile and a half from Saffron Walden to the south west.
- Outside the main towns it should also be noted that adequate sustainable transport infrastructure is unlikely to exist to support development in many instances in terms of both suitability and capacity. It is also unlikely that public transport providers would extend services to more remote parts of the District. Rail links only exist in the villages of Stansted Mountfitchet, Elsenham, Newport, and Great Chesterford.
- Significant growth would likely exacerbate transport pressures in Saffron Walden.
- It is also unlikely that any significant improvements to the road network would be feasible through any one development, or those in accumulation in any settlement.
- Dispersal across the District's villages would not be without a number of significant social implications, particular regarding the cohesion of existing villages and developments that could possibly correspond to their significant expansion.
- Directing growth to the towns would correspond to the most socially inclusive scenario in that extensions to the existing settlements would benefit from the largest concentration of existing community facilities in the District commensurate to their status in the settlement hierarchy.
- This Scenario is unlikely, as a spatial strategy, to meet needs and requirements in the District beyond the plan period.
- There are likely to be concerns regarding infrastructure capacities, particularly in response to a significant amount of extant permissions and windfall sites being within /

extensions of these settlements.

- The cumulative impacts of allocations in the villages would be a likely pressure on local infrastructure and schools, with a potential scenario of no single development being of the scale to meet infrastructure thresholds or ensure their viability.
- There are likely to be some issues surrounding locations on the edge of Bishop's Stortford, where local schools would fall within a different commissioning authority.
- Under this scenario it would be difficult to ensure the allocation and delivery of employment development strategically in terms of suitability, and also in reflection of existing jobs and employment land with a desire to minimise travelling distances.
- There would exist a situation where those villages in closer proximity to existing employment opportunities would be vastly more sustainable than those that are more isolated.

Summary of likely benefits:

- This dispersal scenario may however limit the significance of any loss of the best and most versatile agricultural land in the District, should development proposals be appropriate at a smaller scale commensurate with acceptable expansion of existing settlements.
- It is possible that, supported by relevant infrastructure improvements, there would be less transport emissions resulting from expansion to the District's towns with better access to services.
- The size of proposals, with the potential for one or a number of relatively large extensions forming the growth specified in this scenario, may have the potential for, and viability of, the inclusion of renewable energy sources within proposals.
- The ability to mitigate, or for proposals to be designed to factor in areas that have a risk of flooding, is likely to be more relevant on larger sites.
- Both towns however have a good range of services and facilities, including frequent bus services to and from their centres.
- Expansion of the towns at the scale specified would require additional provision of open space, recreation and healthcare facilities. It is possible that the provision of such facilities would benefit existing and surrounding communities, dependant on scale and accessibility.
- This Scenario would have positive impacts associated with a dispersed distribution of development. This would respond well to meeting the District's identified existing housing needs.
- The allocation of growth on the edge of Bishop's Stortford, but within the District of Uttlesford, can be seen as a generally sustainable approach should allocations be proportionate and suitable in accumulation with any permissions and growth identified in Bishop's Stortford in the East Hertfordshire Local Plan and compatibility with Green Belt requirements.
- A focus on the District's main towns of Saffron Walden and Great Dunmow would see housing growth developed in what can be considered the District's most sustainable settlements in terms of existing infrastructure.
- In the towns there is increased scope for a single development to meet the threshold for a new primary school(s) under this scenario, should this be forthcoming and allocated in preference to a larger amount of smaller urban extensions.

Scenario G: Hybrid Option 2

Summary of potential issues to overcome:

- The cumulative impacts of allocations under this scenario, in addition to any extant permissions and windfall sites within the District, would likely have locally significant impacts on a number of environmental sustainability objectives, including biodiversity.
- Cumulatively, this level of dispersal at the scale required could be seen to have negative impacts on green infrastructure and networks generally throughout the District although it should be acknowledged that this will be less than under Scenario F though the emergence of a new settlement in the plan period that adheres to relevant site selection criteria in this regard.
- Development within the District's main towns and their surrounds can be expected to have some level of negative impact on biodiversity in terms of ecological designations. There are a number of Local Wildlife Sites and one SSSI surrounding Great Dunmow, which may limit the suitability of extensions in certain locations.
- There is a possibility that there could be cumulative negative effects on the water environment in the District, with dispersal potentially affecting a larger number of water bodies than a reliance on fewer larger development allocations that have enhanced potential to mitigate any impacts on site.
- There is the potential for negative impacts to be realised on water quality through the cumulative effects of a number of urban extensions in the same town. This may arise, for example, to the east of Great Dunmow, where extensions could be located in the Upper Chelmer River Valley, and to the south of Saffron Walden regarding the Fulfen Slade; however the emergence of a new settlement will ease the impact on the towns marginally should site selection criteria encompass the objectives of River Basin management Plans as required by the Water Framework Directive.
- There are likely to be Green Belt implications that may limit growth in some villages. This in turn may exacerbate issues in other villages, which would presumably have to accommodate more than proportionate growth.
- There would be a large amount of isolated and potentially cumulatively significant impacts on landscape in a number of the District's villages and any extensions of the District's towns. It is likely that landscape constraints and coalescence issues will exist and could be significant within large areas of land contiguous with development boundaries and it will be difficult to consistently determine which pressures are more acceptable than others in the allocation of land in all locations and in consideration of their unique characteristics.
- Extensions to Bishop's Stortford would have significant implications regarding the restrictions of such development within the Green Belt. This is also the case for a number of villages within the District.
- Assuming that a significant proportion of development directed to the towns would have to be accommodated through one or a number of relatively large urban extensions; the cumulative landscape impacts with extant permissions, particularly to the west of Great Dunmow would be significantly negative.
- Development in the District's villages is unlikely to respond well to the sustainable use of land, where density requirements are likely to be lower than development under other scenarios with one or more larger allocations.
- This scenario is likely to have differing impacts on soil, with Saffron Walden being

surrounded by the best and most versatile soil in the District (Grade 2) and Great Dunmow being largely surrounded by Grade 3, representing the lowest. There are expected to be a range of varying impacts associated with soil through dispersal to the District's villages. A new settlement may also lead to a significant loss of Grade 2 agricultural land.

- There would likely be negative impacts on the historic environment through development of the scale proposed in this Scenario; however the emergence of a new settlement, if sensitively located, would reduce the significance specified in Scenario F.
- Both Saffron Walden and Great Dunmow have historic cores protected as conservation areas, numerous also exist in the District's villages (including Scheduled Monuments), and although development would be unlikely to be located within or adjacent to these designations, it is likely that there would be wider implications on character and potential loss of amenity through increased traffic to these centres for services. Should sites be limited in certain settlements at the scale specified due to impacts on heritage assets, it would be preferable to incorporate this growth within a larger new settlement allocation.
- Specific to Saffron Walden, a significant constraint exists to the east with Audley End House and its Registered Historic Park and Garden.
- It should be noted that an AQMA exists in Saffron Walden and air quality impacts will be magnified in this regard.
- The ability to mitigate, or for proposals to be designed to factor in areas that have a risk of flooding, would be less viable in smaller scale allocations.
- Neither town in the District has rail links within existing development boundaries; the nearest train station Saffron Walden can benefit from is Audley End station in Wendens Ambo, approximately a mile and a half from Saffron Walden to the south west.
- Outside the main towns it should be noted that adequate sustainable transport infrastructure is unlikely to exist to support development in many instances in terms of both suitability and capacity. It should additionally be noted that additional rail links only exist in the settlements of Stansted Mountfitchet, Elsenham, Newport, Wendens Ambo and Great Chesterford. It is also unlikely that public transport providers would extend services to more remote parts of the District.
- Dispersal across the District's villages would not be without a number of significant social implications, particular regarding the cohesion of existing villages and developments that could possibly correspond to their significant expansion.
- There would be some concern whether such a distribution would be adequate to stimulate infrastructure improvements, particularly regarding schools and transport, with a potential scenario of no single allocated development being of the scale to meet infrastructure thresholds or ensure their viability. It can be expected that the largest single development would arise from the new settlement element of the scenario and any upper limit that factors in potential expansion of this beyond 1,500 dwellings should be factored in to any forthcoming masterplan.
- There are likely to be concerns regarding infrastructure capacities, particularly in response to a significant amount of extant permissions and windfall sites being within / extensions of the towns.
- The cumulative impacts of allocations in the villages would likely be significant on a number of social sustainability objectives. Related to this would be a likely pressure on

local infrastructure and schools, with a potential scenario of no single development being of the scale to meet infrastructure thresholds or ensure their viability.

- There are likely to be some cross-boundary issues surrounding locations on the edge of Bishop's Stortford, where local schools would fall within a different commissioning authority.
- The scale specified for the new settlement in the scenario would not solely stimulate the need for a new secondary school which would benefit the wider District.
- Under this scenario it would be difficult to ensure the allocation and delivery of employment development strategically in terms of suitability, and also in reflection of existing jobs and employment land with a desire to minimise travelling distances. There would also exist a situation where those settlements in closer proximity to existing employment opportunities would be vastly more sustainable than those that are more isolated.

Summary of likely benefits:

- The emergence of a new settlement at this scale has the potential to have negative landscape implications, although it can equally be viewed that it would alleviate the pressures in the towns and key villages should it be located sensitively and adhere to Garden City / Settlement principles regarding a belt of countryside to restrict sprawl.
- The broad dispersal element of the scenario may limit the significance of any loss of the best and most versatile agricultural land in the District, should development proposals be appropriate at a smaller scale commensurate with acceptable expansion of existing settlements.
- The size of proposals, with the potential for one or a number of relatively large extensions in addition to the new settlement, may have the potential for, and viability of, the inclusion of renewable energy sources within proposals.
- The ability to mitigate, or for proposals to be designed to factor in areas that have a risk of flooding, is likely to be more relevant on larger sites however this may affect housing densities should extensive mitigation be required. This is also true for the new settlement element of the scenario, and it should be noted that site selection criteria is additionally likely to include flood risk as a constraint to determine suitability.
- Both towns have a good range of services and facilities, including frequent bus services to and from their centres.
- Dependant on location to the strategic road and rail network and also the distance to existing settlements, a new settlement has the potential of supporting sustainable transport methods to be fully integrated, based on an assumption that a range of services and facilities, including new schools and employment opportunities would form part of the development.
- Directing growth to the towns would correspond to the most socially inclusive scenario in that extensions to the existing settlements would benefit from the largest concentration of existing community facilities in the District commensurate to their status in the settlement hierarchy.
- Expansion of the towns at the scale specified would require additional provision of open space, recreation and healthcare facilities.
- The new settlement element of the scenario would similarly require open space and healthcare facilities and these should be recognised in the masterplan of any scheme. The delivery of such facilities is likely to be viable through a new settlement, with

additional benefits felt in surrounding villages and broad areas.

- The hybrid option of delivery would be seen as offering the most dispersed distribution of development of all the scenarios at this growth rate. This would respond well to meeting the District's identified existing housing needs and the start of a new settlement would similarly seek to meet the future needs and requirements of the District.
- This hybrid scenario would respond well to the delivery rate of 750 dwellings per annum and adhere better to the maintenance of a 5 year housing supply over the plan period in the District than any scenario that relied on a new settlement to meet all growth requirements.
- Development in the District's main towns of Saffron Walden and Great Dunmow would see growth developed in what can be considered the District's most sustainable settlements in terms of existing infrastructure.
- In the towns there is increased scope for a single development to meet the threshold for a new primary school(s) under this scenario, should this be forthcoming and allocated in preference to a larger amount of smaller urban extensions.
- A new settlement offers the greatest likelihood of new primary schools being delivered.

Summary of the Strategic Scenarios appraisal

The appraisals of the scenarios in the report highlighted that no single scenario could be guaranteed to meet the current identified and future needs of the District in a wholly sustainable manner. It should be acknowledged that a large amount of potentially adverse environmental impacts are more accurately a result of the growth targets over the plan period, and that any forthcoming options should be developed that seek to minimise these where possible and also seek to maximise benefits.

It was recommended that a suitable balance is sought between meeting existing needs in the District as well as future needs. This relates not only to an element of dispersal across the District, but also in exploring new settlement options in a way that could meet annual housing delivery rates in the latter stages of the plan period. The principle of a new settlement can be seen to be a positive one regarding a number of sustainability objectives and it may be possible to turn constraints into positive impacts through effective masterplans and a spatial strategy that is advanced with awareness of these opportunities.

It was felt that the scenarios explored at this stage cover all reasonable options regarding the broad distribution of growth in the District. The sustainability implications of focusing development in any one tier of the settlement hierarchy, including one or more new settlements, have been explored fully within this sustainability appraisal. More refined distribution in any forthcoming spatial strategy will have been influenced by this sustainability appraisal and in response to the highlighted impacts of directing growth to all reasonable broad locations in the District.

Appendix IV: Site options

Introduction

This appendix sets out all the key information in relation to the site options. It is structured as follows:

- SLAA summary findings (**Table IVA**);
- SA of site options (**Table IVC and IVD**); and
- Outline reasons for selection/ rejection of site options (**Table IVE**).

SLAA summary findings

Table IVA provides a summary of the current SLAA findings.

Table IVA: Summary SLAA findings

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	01Ark15			Arkesden	E	C3	12	This site is available and development is achievable. This site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
Reg 18	02Ark17			Arkesden	E	C3	26	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development
2015	01Ash15			Ashdon	E	C3	5	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development
2015	02Ash15			Ashdon	E	C3	20	The site is available. Achievability of the site is uncertain due to the potential highway improvements needed. This site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	01Bar15			Barnston	E	C3	23	This site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	02Bar15			Barnston	E	C3	5	This site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	01Bir15			Birchanger	E	C3	5	The site is available. The site does not have a road frontage and evidence that a suitable access can be provided would be needed to show that the site is achievable. The site is well related to the village but the site contributes to the functions of the Green Belt and therefore development is considered unsuitable.
2015	02Bir15			Birchanger	C (employment)	B1	5560	The site is available and development is achievable. This development would result in an extension to the existing office development which is well located to the road and bus network but the suitability of the site will depend the scale and location within the site of any development and the impact on the functions of the Green Belt
2015	03Bir15			Birchanger	E	C3	50	The site is available and the development is achievable. This site is considered unsuitable as development on this site would not contribute to sustainable patterns of development and is in the Green Belt
2015	04Bir15			Birchanger	E	C3	10	This site is available and development is achievable subject to providing a satisfactory access. The site contributes to the functions of the Green Belt and therefore development is considered unsuitable.
2016	05Bir15			Birchanger	WITHDRAWN			
2015	06Bir15			Birchanger	E (employment)	B1/B2/B8	50000	The site is available and development is achievable. The site contributes to the functions of the Green Belt and therefore development is considered unsuitable.
2016	07Bir16			Birchanger	E (employment)	Employment	5600	The site is available and development is considered achievable. The site contributes to the functions of the Green Belt and therefore development is considered unsuitable.

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2016	08Bir16			Birchanger	E	C3 or Employment	81 dwellings or 14,400sqm of employment	The site is available and development is achievable. The site is not considered suitable for development due to its location within the Green Belt and its distance from services and facilities
2016	09Bir16			Birchanger	E	C3	792	The site is available and development is achievable. The site is not considered suitable due to its location within the Green Belt within a parcel which performs well against the purposes of the Green Belt and development of this large site would lead to the coalescence of Stansted Mountfitchet and Birchanger.
Reg 18	10Bir17			Birchanger	E	C3	9	The site is available and development is achievable. The site contributes to the functions of the Green Belt and therefore development is considered unsuitable
2015	01Chr15			Chrishall	E	C3	5	The site is available and development is achievable. The site is considered unsuitable as development would not contribute to sustainable patterns of development. Site has consent for a single residential unit on site but as this is permission for less than 5 units, application is not considered as part of SLAA process.
2015	01Cla15			Clavering	E	C3	5	The site is available and the development of the site is achievable. Development of the site would consolidate development which is currently characterised by loose knit ribbon development. Hill Green is some distance from the village school and shop and therefore the site is considered unsuitable as development would not contribute towards sustainable patterns of development.
2015	02Cla15			Clavering	E	C3	5	The site is available and development is achievable. Although the site is well related to Wicken Bonhunt, the village is a Type B village with limited local services and therefore the site is considered

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
								unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	03Cla15			Clavering	E	C3	20	The site is available. The achievability of the site depends on the outcome of the costing of flood protection measures. The site is considered unsuitable as development would not contribute to sustainable patterns of development
2015	04Cla15	CLA1		Clavering	E	C3	13	The site is available and development is achievable. Development of this site would further extend the village southwards into the large agricultural field. Although not an unsuitable site in relation to its proximity to village facilities, the site extends the village into the countryside to the detriment of the wider countryside character
2015	05Cla15			Clavering	E	C3	14	The site is suitable and available and development is achievable. Although not an unsuitable site in relation to its proximity to village facilities, the site extends the village into the countryside to the detriment of the wider countryside character.
2015	06Cla15			Clavering	E	C3	30	The site is available. The achievability of the site is considered unlikely because the site is predominately located within flood zones 2 and 3. The site is suitable in that it is well related to the village but this is outweighed by its location predominately within a flood risk zone.
2015	07Cla15			Clavering	C	C3	45	The site is available. The site's achievability and suitability is subject to the provision of a satisfactory means of access.

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	08Cla15			Clavering	E	C3	5	The site is available for development. The achievability of the site is uncertain because the access to the site is located within flood zones 2 and 3. The site is not considered suitable because of the impact on historic assets.
2015	09Cla15			Clavering	E	C3	30	The site is considered available and development is achievable. This site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	10Cla15			Clavering	E	C3	50	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	11Cla15			Clavering	E	C3	51	This site is available and development is achievable. The recent appeal was dismissed by the inspector on a number of grounds, including unsustainable development, unacceptable impact on local heritage assets and impact on the local countryside. The site is therefore considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	12Cla15			Clavering	E	C3	5	The site is available and development is achievable. This site is considered unsuitable as development of the site would not contribute to sustainable patterns of development.
2015	13Cla15			Clavering	E	C3	15	The site is available and development is achievable. This site is considered unsuitable as development on this site would not contribute to sustainable pattern of development.
2015	14Cla15			Clavering	E	C3	27	This site is considered available and achievable subject to the costs of site preparation. The site is considered unsuitable as development of this site would not contribute to sustainable patterns of

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
								development.
2015	15Cla15			Clavering	E (employment)	B1	unknown	The site is available and development is achievable subject to site preparation costs. The site is considered unsuitable as it will not contribute to a sustainable pattern of development. Conversion of the existing building may be suitable.
2015	16Cla15			Clavering	E	C3	15	The site is available and the achievability of developing this site is uncertain due to the ransom strip between the site and the road. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	17Cla15			Clavering	E	C3	46	The site is available and development is achievable. This site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	18Cla15			Clavering	E	C3	10	The site is available, and achieving a development of affordable housing is uncertain until a needs survey has been undertaken. The site is considered unsuitable as development on this site would not contribute to sustainable pattern of development.
2015	19Cla15			Clavering	E	C3	8	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	20Cla15			Clavering	E	C3	8	The site is available and development is achievable. This site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	21Cla15			Clavering	E	C3	24	The site is available and development is achievable. This site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	22Cla15			Clavering	E	C3	50	The site is available. The achievability of the site is uncertain because parts of the site are located within flood zones 2 and 3. The achievability of the site depends on the outcome of a full flood risk assessment and consideration of mitigation measures. This site is considered unsuitable as development on the site would extend development into the countryside and therefore not contribute to sustainable patterns of development.
2015	23Cla15			Clavering	E	C3	76	The site is available. The achievability of the site is uncertain because parts of the site are located within flood zones 2 and 3. The achievability of the site depends on the outcome of a full flood risk assessment and consideration of mitigation measures. This site is considered unsuitable as development on the site would extend development into the countryside and therefore not contribute to sustainable patterns of development.
2015	01Deb15			Debden	E	C3	19	The site is available for development although the type of development is unclear. Development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	02Deb15/03Deb15	DEB1		Debden	B	C3	25	The site is considered suitable, available and development is achievable

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	04Deb15			Debden	E	C3	6	The site is available and development is achievable subject to cost of re-positioning electricity cable if required. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	05Deb15			Debden	E (employment)	Employment	unknown	The site is available and development is achievable subject to cost of repositioning electricity cable if required. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development
2015	01Elm15			Elmdon and Wendon Lofts	E	C3	30	The site is available and development is considered achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
		ELS2	Commitment	Elsenham				
		ELSE4	Commitment	Elsenham			40	
		ELSE4	Commitment	Elsenham			10	
		ELSE4	Commitment	Elsenham			121	
		ELSE4	Commitment	Elsenham			116	
2015	01Els15			Elsenham	D (employment)	Employment	202,000	The site is available and development is achievable subject to detailed highway assessment. The site contributes to the function of the Countryside Protection Zone therefore the suitability of the site depends on whether the evidence of the need for employment outweighs the harm to the Countryside Protection Zone. Due to the slow delivery of the permitted development it is uncertain whether this developemnt would be delivered within the plan period.
2015	02Els15	ELSE3		Elsenham	A	C3	20	The site is deliverable. Outline planning permisison has been granted on site for 20no units.

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	03EIs15			Elsenham	E	C3	100	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	04EIs15			Elsenham	E	C3	30	The site is available. Achievability of the site is uncertain but the site is not considered suitable because the majority of the site lies within the M11 poor air quality zone
2015	05EIs15			Elsenham	E	C3	800	This site is being promoted as a village extension incorporating services and facilities. The site is available and development is achievable subject to assessment of the technical evidence. An appeal against refusal of premission for 800 dwellings on the site was dismissed on a number of grounds, including the development causing harm both to the landscape and views across it (Para 33), the loss of best and most veratile agricultural land (Para 34) and traffic impacts (Paras 35-38). For these reasons the site is considered unsuitable.
2015	06EIs15			Elsenham	E	C3	1500	This site is being promoted as a village extension incorporating services and facilities. The site is available and development is achievable subject to assessment of the technical evidence. An appeal against refusal of permission for 800 dwellings on part of the site was dismissed on a number of grounds, including the development causing harm both to the landscape and views across it (Para 33), the loss of best and most veratile agricultural land (Para 34) and traffic impacts (Paras 35-38). It is not considered that these reasons for refusal are overcome by this larger site. For these reasons the site is considered unsuitable.

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	07Els15			Elsenham	new settlement	C3	4000	This site is being promoted as a village extension incorporating services and facilities. The site is available and development is achievable subject to assessment of the technical evidence. The promoters have submitted a range of technical reports which indicate that this site is achievable and deliverable. The Council's strategy is towards self-sustaining Garden Communities. The suitability of the site will be considered as part of the consideration of alternative new settlement sites taking into account the findings of the Sustainability Appraisal and the Council's evidence base.
2015	08Els15	ELSE1		Elsenham	B	C3	40	The site is available and development is considered suitable and achievable.
2015	09Els15			Elsenham	E	C3	480	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2016	10Els16			Elsenham	E (employment)	C3 or Employment	19 dwellings or 2,800sqm of employment	The site is available and development is achievable. The site is considered suitable for employment development subject to its relationship with any further development at Elsenham Meadows. The site is considered unsuitable for residential development as this would lead to development in a non-sustainable location.
2017	11Els17			Elsenham	D	C3	36	The site is available and is considered suitable because it would lead to development in a sustainable location. However the achievability of developing this site is uncertain due to the ransom strip between the site and the road, and the uncertainty of development being promoted to the north and east of the site. It is therefore uncertain

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
								whether the site is deliverable within the plan period.
2015	01Far15			Farnham	E	C3	5	The site is available and development is achievable. This is a small site not considered suitable to allocate in the Local Plan
2015	02Far15			Farnham	E	C3	25	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	03Far15			Farnham	E	C3	16	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	04Far15			Farnham	E	C3	41	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
		FEL3	Commitment	Felsted			21	
2015	01Fel15	FEL1		Felsted	B	C3	40	The site is available and development is achievable. The suitability of the site will depend on the extent of the development and developing only the southern part of the site may be the most suitable. The deliverable capacity has been amended to reflect this
2015	02Fel15			Felsted	E	C3	41	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	03Fel15			Felsted	D (employment)	Employment	9550	The site is available. The achievability of the site depends on the outcome of a full flood risk

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
								assessment and highways assessment. The site is only suitable if an east bound access point is made onto the A120.
2015	04Fel15			Felsted	E	C3	5	The site is suitable, available and achievable for small scale development.
2015	05Fel15			Felsted	E	C3	34	The site is available. The site's achievability is subject to the provision of a satisfactory means of access. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	06Fel15			Felsted	E	C3	5	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	07Fel15			Felsted	E	C3	45	The site is available and development is achievable subject to the impact of development on the listed building. Development of the site is considered unsuitable because it would not contribute towards a sustainable pattern of development.
2015	08Fel15			Felsted	E	C3	15	The site is available. The achievability of developing the site will depend on contamination and site preparation costs. The site is not considered suitable because it would not contribute to a sustainable pattern of development.
2015	09Fel15			Felsted	E	C3	6	The site is available and development is achievable subject to any highway improvements and impact on listed building. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	10Fel15			Felsted	E	C3	5	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	11Fel15			Felsted	E (employment)	Employment	unknown	The site is available but development is not considered suitable or achievable as it is not compatible with the masterplan for Land West of the A131, Great Notley adopted by Braintree District Council.
2015	12Fel15			Felsted	A	C3	9	The site is deliverable and has planning permission for 9 dwellings. The capacity has been amended accordingly.
2015	13Fel15			Felsted	E	C3	95	The site is considered available and development is achievable. In the light of the appeal decision the site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	14Fel15			Felsted	E	C3	135	The site is considered available and development is considered achievable. The site is however considered unsuitable as it would lead to a coalescence of Felsted and Causeway End and would not contribute to a sustainable pattern of development.
2015	15Fel15			Felsted	E	C3	13	The site is considered available and development is considered achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	16Fel15			Felsted	E	C3	15	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	17Fel15	FEL2		Felsted	B	C3	50	The site is considered suitable and available and achievable. The deliverable capacity reflects the whole site being development for housing, as opposed to a dementia care unit and housing as originally proposed.
2015	18Fel15			Felsted	E	C3	30	The site is available and development is considered achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	19Fel15			Felsted	E	C3	30	The site is considered available and development is considered achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	20Fel15			Felsted	E	C3	10	The site is considered available and development is considered achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	21Fel15			Felsted	D (employment)	Employment	unknown	The site is available and development is achievable. The site is only suitable if an east bound access point is made onto the A120.
2015	22Fel15			Felsted	D (employment)	Employment	unknown	The site is available. The achievability of the site depends on the outcome of a full flood risk assessment and highways assessment. The site is only suitable if an east bound access point is made onto the A120.
2015	23Fel15			Felsted	E	C3	480	The site is available. The development is achievable subject to it still being viable after the provision of the necessary infrastructure. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	24Fel15			Felsted	E	C3	5	The site is available. The development is achievable subject to consideration of the impact on and of the permitted solar farm. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	25Fel15			Felsted	E	C3	231	The site is available. The development is achievable subject to it still being viable after the provision of the necessary infrastructure. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	26Fel15			Felsted	E	C3	116	The site is available. The development is achievable subject to it still being viable after the provision of the necessary infrastructure. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	27Fel15			Felsted	E	C3	246	The site is available. The development is achievable subject to it still being viable after the provision of the necessary infrastructure. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	28Fel15			Felsted	E	C3	44	The site is available. The development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development
2016	29Fel16			Felsted	E	C3	49	The site is available. Development is achievable subject to an acceptable access. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2016	30Fel16			Felsted	E	C3	52	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
		FLI1	Commitment	Flitch Green			47	
		FLI1	Commitment	Flitch Green			25	
2015	01GtCan15			Great Canfield	G&T	G&T	2	The site is considered suitable and available and development is considered achievable. The site has planning permission for 3 additional pitches.
2015	02GtCan15			Great Canfield	E	C3	9	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	03GtCan15			Great Canfield	E	C3	7	The site is available and development is achievable. The site is not considered suitable as development of the site would not lead to a sustainable pattern of development.
2015	04GtCan15			Great Canfield	E	C3	211	The site is available. Achievability of development is dependent upon highway improvements. The site is not considered suitable as development of the site would not lead to a sustainable pattern of development.
2015	05GtCan15			Great Canfield	B	C3	5	The site is available and development is achievable. Site is too small and beyond the development limits of Great Canfield and Takeley to be allocated in the Local Plan. The site is however part brownfield with a workshop on site and the potential for development could be assessed through the pre-application process
2017	06GtCan17			Great Canfield	E	C3	99	The site is available. Achievability of development is dependent upon highway improvements. The site is not considered suitable as development of the site would not lead to a sustainable pattern of development.
Reg 18	07GtCan17			Great Canfield	E	C3	315	The site is available and development is achievable subject to highway capacity. The site is considered

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
								unsuitable as development on the site would not contribute to sustainable patterns of development.
		GTCHE1	Commitment	Great Chesterford				
2015		GTCHE2	Commitment	Great Chesterford			42	
2015	05GtChe15	GTCHE2	Commitment	Great Chesterford	A	C3	31	The site is deliverable. The site has outline permission for 31no dwellings.
		GTCHE3	Commitment	Great Chesterford				
2015	01GtChe15			Great Chesterford	E	C3	8	The site is available. Development is considered achievable subject to the cost of mitigation measures against noise from the railway line and M11. The site is considered unsuitable due to its location between the railway line and M11
2015	02GtChe15			Great Chesterford	E	C3	22	The availability of the site is uncertain due to a covenant restrict building development, the achievability of development is dependent upon the costs of backfilling the former minerals working at Zone 2. Both sites are considered unsuitable due to their location within Ancient Monument sites and the loss of woodland at Zone 2
2015	03GtChe15			Great Chesterford	E	C3	8	The site is considered available and achievable. The site is not considered suitable for development due to its impact on the conservation area, setting of the listed building and protected trees.
2015	04GtChe15			Great Chesterford	E	C3	5	The site is available and development is achievable. Planning permission was granted in February 2017 for 2no units on the eastern part of the site. However, development of the remaining site area is unsuitable because of the impact on the conservation area and tree preservation orders.

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	06GtChe15			Great Chesterford	E	C3	203	The site is available. Achievability is uncertain due to issues of flooding and the Scheduled Ancient Monument. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development
2015	07GtChe15			Great Chesterford	E	C3	581	The site is available. Achievability is uncertain due to issues of flooding and the Scheduled Ancient Monument. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	08GtChe15			Great Chesterford	E	C3	2500	The site is available and the achievability of the site needs to be demonstrated by appropriate technical evidence. The site as proposed is unsuitable because it would not contribute to sustainable patterns of development. However this site is being considered as part of GtCh10.
2015	09GtChe15			Great Chesterford	E	C3	300	The site is available and the achievability of the site needs to be demonstrated by appropriate technical evidence. The site as proposed is unsuitable because it would not contribute to sustainable patterns of development. However this site is being considered as part of GtChe10.
2015	10GtChe15	SP7		Great Chesterford	new settlement	C3	5000	This site is being promoted as a village extension incorporating services and facilities. The site is available and development is achievable subject to assessment of the technical evidence. The promoters have submitted a range of technical reports which indicate that this site is achievable and deliverable. The Council's strategy is towards self-sustaining Garden Communities. The suitability of the site will be considered as part of the consideration of alternative new settlement sites taking into account the findings of the Sustainability

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
								Appraisal and the Council's evidence base.
2015		GtDUN10	Commitment	Great Dunmow			40	
2015	10GtDun15	GtDUN10	Commitment	Great Dunmow			60	
2015		GtDUN10	Commitment	Great Dunmow			638	
2015		GtDUN10	Commitment	Great Dunmow			124	
2015	01GtDun15	GtDUN4		Great Dunmow	B	C3	30	The site is available and development is considered achievable and suitable
2015	02GtDun15			Great Dunmow	E	C3	5	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to a sustainable pattern of development.
2015	03GtDun15			Great Dunmow	D (employment)	C3	35	The site is available and development is achievable subject to mitigation measures to reduce the impact of the A120. The site is suitable for development if adjoining land to the east is allocated. Considering the sites location next to the A120, its junction with the B1256 and existing employment uses on site, the site may be more suitable for uses other than residential. The suitability of this site is dependent upon and should be reassessed following the delivery of the nearby site (12GtDun15). The site is therefore considered broadly developable but not deliverable for housing within the plan period.

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	04GtDun15			Great Dunmow	B	C3	9	The site is considered suitable and available and development is considered achievable. Site is included within the Town Development Limits in the Great Dunmow Neighbourhood Plan.
2015	05GtDun15	GtDUN10	Commitment	Great Dunmow	A	C3	99	The site is available, achievable and suitable and has planning permission which is being delivered.
2015	06GtDun15	GtDUN5		Great Dunmow	B	C3	13	The site is considered suitable and available and development is considered achievable. The site is included for development in the Great Dunmow Neighbourhood Plan.
2015	07GtDun15	GtDUN3		Great Dunmow	B	C3	120	The site is considered suitable and available and development is considered achievable.
2015	08GtDun15	GtDUN2		Great Dunmow	B	C3	100	The site is available and development is considered achievable subject to the financing of the new secondary school and sixth form center. Development of the site is considered suitable.
2015	09GtDun15			Great Dunmow	E	C3	80	The site is considered available and development is considered achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development
2015	10GtDun15			Great Dunmow	E	C3	19	The site is available and development is considered achievable subject to the cost of removal of existing buildings and any remediation works needed for contamination. The site has planning permission for 5 dwellings but the site is considered unsuitable for more intensive development as it would not contribute to sustainable patterns of development.
2015	11GtDun15	GTDUN7		Great Dunmow	E	C3	35	The site is available and development is achievable. It is considered that the site is unsuitable as it extends development into the countryside contributing to an unsustainable pattern of development

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
		GTDUN8	Commitment	Great Dunmow		C3		
		GTDUN9	Commitment	Great Dunmow		C3		
		GTDUN6	Commitment	Great Dunmow		C3		
2015	12GtDun15	GtDUN1		Great Dunmow	B	C3	400	The site is considered available and suitable and development is considered achievable subject to provision of land to be provided for secondary school.
2015	13GtDun15			Great Dunmow	E	C3	53	The site is available and development is considered achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	14GtDun15			Great Dunmow	E	C3	28	The site is available and development is considered achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development
2015	15GtDun15			Great Dunmow	E	C3	750	The site is available and development is considered achievable subject to development avoiding the areas subject to flood risk and the delivery of appropriate education provision for this scale of development. The site is considered unsuitable as development on this site would not contribute to a sustainable pattern of development
2015	16GtDun15			Great Dunmow	E	C3	30	The site is available and development is considered achievable subject to a full flood risk assessment and consideration of mitigation measures. The site is considered unsuitable as development on the site would not contribute to a sustainable pattern of development.
2015	17GtDun15			Great Dunmow	E	C3	40	The site is available. The site is not considered suitable or development achievable because of its location within Flood Zones 2 and 3

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	18GtDun15			Great Dunmow	B	C3	10	The site is considered available and suitable and development is considered achievable.
2016	19GtDun15	GTDUN11	Development Opportunity	Great Dunmow	C	development opportunity	9	The site is suitable for town centre uses including residential. This site would be in a prime location for new residential development, being located within the Development Limits of Great Dunmow and is a Brownfield site. The availability of the site is dependant upon the successful relocation of the depot.
		GTDUN11	Development Opportunity	Great Dunmow		development opportunity		
2016	20GtDun16			Great Dunmow	E	C3	11	The site is available and development is achievable. The site is considered unsuitable as development of the site would not contribute to sustainable patterns of development
Reg 18	21GtDun17			Great Dunmow	B	C3	5	The site is available and suitable and development is achievable.
2015	01GtEas15			Great Easton and Tilty	E	C3	8	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable pattern of development.
2015	02GtEas15			Great Easton and Tilty	E	C3	30	The site is available and development is achievable. Development of the site is considered unsuitable as development on this site would not contribute to sustainable patterns of development
2015	03GtEas15			Great Easton and Tilty	WITHDRAWN	WITHDRAWN	WITHDRAWN	WITHDRAWN
2015	04GtEas15	GtEAS1		Great Easton and Tilty	B	C3	20	The site is available and development is achievable subject to a achieving an access to the site. The northern part of the site is considered suitable for development

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	01GtHal15			Great Hallingbury	E	C3	28	The site is available and development is achievable subject to the cost of noise mitigation measures. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	02GtHal15			Great Hallingbury	E	C3	35	The site is available and development is achievable subject to the cost of noise mitigation measures. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	03GtHal15			Great Hallingbury	E	C3	180	The site is available and development is achievable. The site contributes to the functions of the Green Belt and therefore development is considered unsuitable.
2015	04GtHal15	safeguarded for employment		Great Hallingbury	A (employment)	B1	1673	The site is available and development is achievable. Development of the site is suitable subject to impact on historic assets and countryside protection zone.
2015	05GtHal15			Great Hallingbury	E (employment)	Employment	unknown	The site is available and development is considered achievable subject to mitigation against air noise. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development
2016	06GtHal16			Great Hallingbury	E	C3	41	The site is available and development is achievable. Site as submitted is considered to be of an unsustainable scale and would have an unacceptable impact on the surrounding landscape
2016	07GtHal16			Great Hallingbury	E (employment)	Employment	1400	The site is available and development is considered achievable subject to mitigation against air noise. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2016	08GtHal16			Great Hallingbury	C (employment)	Employment	1890	The site is available and development is achievable. Development of the site is suitable subject to impact on historic assets and countryside protection zone.
2016	09GtHal16			Great Hallingbury	E (employment)	B1	unknown	The site is available. The development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	01GtSam15			Great Sampford	E	C3	5	The site is available. Development of the site is achievable subject to achieving highway access. Previous applications have been refused on the grounds that the development proposal would have an unacceptable impact on the countryside and the new vehicular access to neighbouring dwellings would cause significant disturbance to existing occupiers. The site is therefore considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	02GtSam15			Great Sampford	E	C3	7	
2015	01Had15			Hadstock	E	C3	35	The site is available and development is achievable subject to the cost of removal of existing buildings and any remediation works needed for contamination. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	01HBO15			Hatfield Broad Oak	E	C3	45	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	02HBO15			Hatfield Broad Oak	D	C3	16	The site is available and development is achievable subject to the cost of removal of existing buildings and any remediation works needed for contamination. Development of part of the site is considered suitable and Planning permission has been granted for 2 dwellings. Further intensification of the site is not suitable unless part of a wider development with 03HBO15.
2015	03HBO15			Hatfield Broad Oak	C	C3	250	The site is available and development is achievable. The site is considered suitable subject to mitigation of impact on highways and Hatfield Forest.
2015	04HBO15			Hatfield Broad Oak	D	C3	153	The site is available and development is achievable. Development of this site is dependant upon site to the east (03HBO15) coming forward in order to access the site. It is therefore unlikely that this site will come forward for development within the plan period.
2015	05HBO15			Hatfield Broad Oak	B	C3	8	The site is available and suitable and development is achievable subject to the retention of the protected trees and character of the conservation area being protected and enhanced.
2015	06HBO15			Hatfield Broad Oak	E	C3	30	The site is available but is not considered suitable or achievable due to the poor access to the site
2016	07HBO16			Hatfield Broad Oak	E	C3	6	The site is available. The site is not considered achievable and suitable due to part of the site being within flood zone 2.
Reg 18	08HBO17			Hatfield Broad Oak	E	C3	24	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	01HHea15			Hatfield Heath	E	C3	31	The availability and achievability of the site is uncertain because it is not known whether the site owner has the legal right to create a vehicular access across the common land between the site and the road. The site contributes to the functions of the Green Belt and therefore development is considered unsuitable.
2015	02HHea15			Hatfield Heath	E	C3	7	This site is available and development is achievable. The site contributes to the functions of the Green Belt and therefore development is considered unsuitable.
2015	03HHea15			Hatfield Heath	E	C3	70	This site is available and development is achievable. The site contributes to the functions of the Green Belt and therefore development is considered unsuitable.
2015	04HHea15			Hatfield Heath	E	C3	10	The site is available and development is achievable subject to the cost of clearing the existing buildings. The site contributes to the functions of the Green Belt and therefore development is considered unsuitable.
2015	05HHea15			Hatfield Heath	E	C3	75	The site is available and development is considered achievable. The site contributes to the functions of the Green Belt and therefore development is considered unsuitable.
2015	06HHea15			Hatfield Heath	E	C3	40	The availability and achievability of the site is uncertain because it is not known whether the site owner owns sufficient land to create an access. The site contributes to the functions of the Green Belt and therefore development is considered unsuitable.
2015	07HHea15			Hatfield Heath	E	C3	35	The site is available and development is considered achievable. The site contributes to the functions of the Green Belt and therefore development is considered unsuitable.

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
Reg 18	08HHea17			Hatfield Heath	E	C3	54	The site is available and development is achievable. The site contributes to the functions of the Green Belt and therefore development is considered unsuitable..
Reg 18	09HHea17			Hatfield Heath	E	C3	39	The site is available and development is achievable. The site contributes to the functions of the Green Belt and therefore development is considered unsuitable.
2015	01Hen15			Henham	E	C3	22	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	02Hen15			Henham	E	C3	90	The site is available. There is uncertainty as to whether an access can be achieved. The site is not considered suitable because of its impact on the historic core of the village and therefore would not contribute to a sustainable pattern of development.
2015	03Hen15			Henham	E	C3	5	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	04Hen15			Henham	B	C3	36	The site is available and development is achievable subject to being able to gain access over land owned by Essex County Council. The site is considered a suitable location for development.
2015	05Hen15			Henham	E	C3	120	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	06Hen15			Henham	E	C3	5	The site is available and development is achievable subject to satisfactory noise insulation of the dwellings. The site is considered unsuitable because development of the site would not contribute to

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
								sustainable patterns of development
2016	07Hen16			Henham	A	C3	9	The site is available and development is achievable. Part of the site has planning permission and is therefore considered deliverable for 9 dwellings. The remainder of the site is not considered suitable as development of the site would extend development into the countryside to the detriment of the character of the area. The delivery capacity of the site has therefore been amended to 9 dwellings.
Reg 18	08Hen17			Henham	E	C3	70	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	01HEas15			High Easter	E	C3	5	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development
2015	02HEas15			High Easter	E	C3	10	The site is available and development is achievable. The site is considered unsuitable as development of this site would not contribute to sustainable patterns of development.
2015	01HRod15 (part of site)	HROD1	Commitment	High Roding			40	
2015	01HRod15			High Roding	A	C3	9	The site is deliverable. The site has outline permission for 9 dwellings
2015	02HRod15			High Roding	E	C3	160	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	03HRod15			High Roding	E	C3	60	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2016	04HRod16			High Roding	E	C3	8	The site is available and development is achievable but development is not suitable because development of the site would not contribute to sustainable patterns of development.
2015	01Lan15			Langley	E	C3	20	The site is available and development is achievable subject to achieving an access across public land. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	02Lan15			Langley	E	C3	10	The site is available and development is achievable subject to achieving an access across public land. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	03Lan15			Langley	E	C3	30	The site is available and development is achievable subject to achieving an access across public land. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	01LRod15			Leaden Roding	E	C3	13	The site is available and development is achievable. The site contributes to the functions of the Green Belt and therefore development is considered unsuitable.
2015	02LRod15			Leaden Roding	E	C3	100	The site is available and development is achievable. The site contributes to the functions of the Green Belt and therefore development is considered unsuitable.

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	03LRod15			Leaden Roding	E	C3	58	The site is available and development is achievable. The site contributes to the functions of the Green Belt and therefore development is considered unsuitable.
2015	04LRod15			Leaden Roding	E	C3	9	The site is available and development is achievable. The site contributes to the functions of the Green Belt and therefore development is considered unsuitable.
2015	05LRod15			Leaden Roding	E	C3	9	The site is available and development is achievable. The site contributes to the functions of the Green Belt and therefore development is considered unsuitable.
2015	01Lin15			Lindsell	E	C3	5	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development
2015	02Lin15			Lindsell	E	C3	5	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development. Site is located outside the development limits of Lindsell and is a Greenfield site. It is therefore unlikely that this site will come forward in the plan period
2015	03Lin15			Lindsell	E	C3	10	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	04Lin15			Lindsell	E	C3	54	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	01Lit15			Littlebury	E	C3	13	The site is available and development is achievable subject to the cost of removal of existing buildings. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
Reg 18	02Lit17			Littlebury	E	C3	30	The site is available and development is achievable but the site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	01LtCan15			Little Canfield	E	C3	10	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	02LtCan15			Little Canfield	B	C3	15	The site is available and considered suitable and development is achievable. The deliverable capacity reflects the capacity of the whole site
2015	03LtCan15			Little Canfield	E	C3	60	The site is available and development is achievable subject to mitigation measures to overcome the impact of the A120. The site is considered unsuitable for residential development as development on this site would not contribute to sustainable patterns of development. However, its proximity to the A120 means that the site is considered potentially suitable for employment.
2015	04LtCan15			Little Canfield	A	C3	5	The site is deliverable and has planning permission for 5 dwellings
2015	05LtCan15			Little Canfield	E	C3	5	The site is available and development is achievable subject to design and layout not adversely affecting listed building and its setting. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	06LtCan15			Little Canfield	G&T	G&T	6	The site is available and development is achievable subject to design and layout not adversely affecting listed building and its setting. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development
2015	07LtCan15			Little Canfield	E	C3	5	The site is available and development is achievable subject to design and layout not adversely affecting listed building and its setting. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	08LtCan15			Little Canfield	C (employment)	B1/B2/B8	unknown	The site is available and notwithstanding the sites location within the countryside, its proximity to the A120 means that the site is considered potentially suitable for employment, and development is considered deliverable
2015	09LtCan15	LtCAN1		Little Canfield	B (employment)	Employment	unknown	The site is available and notwithstanding the sites location within the countryside, its proximity to the A120 means that the site is considered potentially suitable for employment, and development is considered deliverable
2015	10LtCan15			Little Canfield	E	C3	315	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	11LtCan15			Little Canfield	E	C3	145	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	01LtChe15	LtCHE1		Little Chesterford	B (employment)	Employment	38000	The site is available and suitable and development is achievable
2015	02LtChe15			Little Chesterford	E	C3	5	The site is available and development is achievable subject to a flood risk assessment. The site is

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
								considered unsuitable as development on this site would not contribute to sustainable patterns of development
2015	03LtChe15			Little Chesterford	E	C3	200	The site is available and development is considered achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	04LtChe15			Little Chesterford	E	C3	100	The site is available and development is considered achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	05LtChe15			Little Chesterford	E	C3	10	The site is available and development is achievable subject to upgrading the access road. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2016	06LtChe15			Little Chesterford	E	C3	20	Availability of the site due to a restrictive covenant is unknown. Development of the site is achievable. The site is not considered suitable as it would lead to an unsustainable pattern of development
		LtDUN1	Commitment	Little Dunmow			6	
2015	01LtDun15			Little Dunmow	E	C3	400	The site is available and development is considered achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	02LtDun15			Little Dunmow	E	C3	750	The site is available and development is considered achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	03LtDun15			Little Dunmow	E	C3	1700	The site is available and development is considered achievable. The site is considered unsuitable as development on this site would not contribute to

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
								sustainable patterns of development.
2015	01LtEas15			Little Easton	E	C3	6	The site is available and development is considered achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	02LtEas15			Little Easton	E	C3	5	The site is available. The site is not considered achievable because of the sites location within zones 2 and 3 of the flood plain. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development
2015	03LtEas15			Little Easton	E	C3	65	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	04LtEas15			Little Easton	E	C3	80	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development
2015	05LtEas15			Little Easton	E	C3	1000	The site is available and development is achievable subject to assessment of the technical evidence. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	06LtEas15	SP6		Little Easton	new settlement	C3	9150	This site is being promoted as a village extension incorporating services and facilities. The site is available and development is achievable subject to assessment of the technical evidence. The promoters have submitted a range of technical reports which indicate that this site is achievable and deliverable. The Council's strategy is towards self-sustaining Garden Communities. The suitability of the site will be considered as part of the consideration of alternative new settlement sites taking into account the findings of the Sustainability Appraisal and the Council's evidence base.
2015		LtHAL1	Commitment	Little Hallingbury			16	
2015	01LtHal15			Little Hallingbury	E	C3	20	The site is available and development is achievable subject to highway improvements. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development
2015	02LtHal15			Little Hallingbury	E	C3	50	The site is available and development is achievable subject to satisfactory flood mitigation measures for the access way. The site contributes to the functions of the Green Belt and therefore development is considered unsuitable.
2015	03LtHal15			Little Hallingbury	E	C3	60	The site is available and development is achievable subject to appropriate mitigation measures and design solutions to reduce the impact of the M11. The site contributes to the functions of the Green Belt and therefore development is considered unsuitable.
2015	04LtHal15			Little Hallingbury	E	C3	50	The site is available and development is achievable subject to highway improvements to the access. The site contributes to the functions of the Green Belt and therefore development is considered unsuitable.

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	01Man15			Manuden	E	C3	12	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2016	02Man16			Manuden	E	C3	30	The site is available and development is considered achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2016	03Man16			Manuden	E	C3	20	The site is available and development is achievable. The site is not suitable as it would not lead to a sustainable pattern of development.
2015		Policy 1	Commitment	Newport			84	
2015		Policy 1	Commitment	Newport			15	
2015		Policy 1	Commitment	Newport			34	
2015		Policy 1	Commitment	Newport			7	
		NEWP6	Safeguarded	Newport				
2015	01New15			Newport	E	C3	5	The site is available and development is achievable. This site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	02New15	NEWP2		Newport	A	C3	11	The site is considered deliverable. Planning permission has been granted for part of the site for 11 dwellings.
2015	03New15			Newport	B	C3	24	The site is available and considered suitable and development is achievable subject to suitable mitigation of any ground contamination.
2015	04New15			Newport	C	C3	200	The site is available and development is achievable. The suitability of the site depends on the council's assessment of the impact of development on the landscape and highways

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	05New15			Newport	E	C3	90	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	06New15	NEWP1		Newport	A	C3	94	The site is deliverable and has planning permission for 94 dwellings.
		NEWP3	Commitment	Newport				
2015	07New15	NEWP4		Newport	E	C3	10	The site is available. The achievability of the site is uncertain because parts of the site are located within flood zones 2 and 3. The site is considered unsuitable as development on this site would not contribute sustainable patterns of development through the loss of important wildlife habitats.
2015	08New15			Newport	A	C3	90	The site is deliverable and has planning permission for a residential care home facility of which the 90 apartments and cottages will contribute towards housing supply. The deliverable capacity has been amended to 90.
2015	09New15			Newport	A	C3	4	The site is deliverable for 2 dwellings and planning permission has been given on site for 2no units. The deliverable capacity has been amended to 2 units
2015	10New15	Policy 1	Commitment	Newport	A	C3	20	The site is deliverable and has planning permission for 20 dwellings. The deliverable capacity has been amended to 20 dwellings
2015	11New15			Newport	E	C3	15	The site is available and development is achievable subject to the cost of achieving an acceptable access. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	12New15			Newport	E	C3	15	The site is available and development is achievable subject to acceptable replacement of the car park and design solutions to reduce the impact of the

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
								railway line. The site is not considered suitable due to loss of school land especially playing fields and car parking, and impact of noise from the railway.
2015	13New15			Newport	E	C3	46	The site is available and development is achievable subject to achieving a suitable access road. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	01Que15			Quendon and Rickling	E	C3	9	This site is available and development is achievable. This site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	02Que15	QUE1		Quendon and Rickling	B	C3	19	The site is available and considered suitable and development is achievable.
2015	03Que15	QUE2		Quendon and Rickling	A	C3	12	The site is deliverable and has planning permission for 12 dwellings
2015	04Que15			Quendon and Rickling	E	C3	20	The site is available and development is achievable subject to the status of the burial ground. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	05Que15			Quendon and Rickling	E	C3	10	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	06Que15			Quendon and Rickling	E	C3	26	The available of the land to access the site is not known. Development of the site is achievable subject to the provision of an access. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
reg 18	07Que17			Quendon and Rickling	E	C3	40	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
reg 18	08Que17			Quendon and Rickling	E	C3	143	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
		RAD1	Commitment	Radwinter			22	
2015	01Rad15			Radwinter	E	C3	5	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	02Rad15			Radwinter	E	C3	20	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
		SAF10	Commitment	Saffron Walden			73	
		SAF10	Commitment	Saffron Walden			11	
		SAF10	Commitment	Saffron Walden			167	
		SAF10	Commitment	Saffron Walden			10	
2015	01LtWal15			Saffron Walden	E	C3	10	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	02LtWal15			Saffron Walden	E	C3	10	The site is available and development is achievable subject to development being located beyond flood zones 2 and 3. The site is considered unsuitable as development on the site would not contribute to

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
								sustainable patterns of development.
2015	03LtWal15			Saffron Walden	E	C3	10	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development
2015	01Saf15			Saffron Walden	A	C3	1	The site is available and development is achievable and suitable. Permission has been granted for one dwelling which is below the threshold to be included in the assessment. There is little potential for further development on the site.
2015	02Saf15			Saffron Walden	A	C3	5	The site is deliverable and has planning permission for 5 dwellings
2015	03Saf15	SAF5		Saffron Walden	B	C3	14	The site is available and development is achievable subject in both cases to being able to access the site from the redevelopment site to the east. The site is considered suitable for development.
2015	04Saf15	SAF6		Saffron Walden	B	C3	13	The site is available and considered suitable and development is achievable. The deliverable capacity has been amended to 13
2015	05Saf15	SAF14	Development Opportunity	Saffron Walden	B	C3	10	The site is available and considered suitable and development is achievable
2015	06Saf15			Saffron Walden	E	C3	5	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	07Saf15	SAF1		Saffron Walden	B	C3	150	The site is available and development is achievable and suitable subject to satisfactory highway mitigation measures. The deliverable capacity has been amended to reflect a lower capacity as

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
								determined by the highways evidence
2015	08Saf15			Saffron Walden	D	C3	165	The site is available and development is achievable subject to a viable access road linking the site to the highway network and appropriate highway mitigation measures. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development. However the site may be considered suitable, as part of a larger, comprehensive development of recreational space, and residential development and a road linking Thaxted Road and Debden Road. Such development is not deliverable within the plan period but could be subject to the outcome of the wider evidence base supporting the next local plan preparation.
2015	09Saf15			Saffron Walden	E	C3	50	The site is available and development is achievable. This site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	10Saf15	SAF2		Saffron Walden	A	C3	85	The site is deliverable and has planning permission for 85 dwellings
2015	11Saf15	SAF8		Saffron Walden	C	C3	450	The site is available and development is achievable subject to satisfactory highway mitigation measures. The site is considered suitable subject to being able to demonstrate that there would be no adverse effect on the efficient operation of the local highway network.
2015	12Saf15	SAF7		Saffron Walden	A	C3	31	The site is deliverable and has planning permission for 31 dwellings. The deliverable capacity has been amended to 31.

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	13Saf15	SAF3		Saffron Walden	B	C3	10	The site is available and development is considered suitable and achievable.
		SAF9	Commitment	Saffron Walden				
2015	14Saf15			Saffron Walden	E	C3	8	The site is available. It is considered that the site is not suitable and that development is not achievable as the site lies within flood zones 2 and 3
2015	15Saf15			Saffron Walden	E	C3	400	The site is available. Development of the site is achievable subject to appropriate highway mitigation measures. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development
2016	16Saf16	SAF4		Saffron Walden	B	C3	12	The site is suitable. Development is achievable subject to protection of listed buildings and cost of contamination remediation works. The availability of the site is not known and therefore its deliverability is shown towards the end of the plan period.
2016	17Saf16	SAF13		Saffron Walden	B (employment)	Employment	4000	The site is suitable and available for employment development and development is achievable subject to contamination and highway mitigation measures
2016	18Saf16	SAF14	Development Opportunity	Saffron Walden	C	C3	15	The site is suitable for town centre uses including residential. The achievability of development and availability of the site is not known. Emerging Council policy supports the regeneration of this site. However the timing and scale of any residential development is unknown and therefore it is not relied upon in meeting the Council's housing need.
2016	19Saf16	SAF14	Development Opportunity	Saffron Walden	C	C3	6	The site is suitable for town centre uses including residential. The achievability of development and availability of the site is not known. Emerging Council policy supports the regeneration of this site. However the timing and scale of any residential development is unknown and therefore it is not relied upon in

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
								meeting the Council's housing need
reg 18	20Saf17			Saffron Walden	C	C3 or Employment	54 dwellings or 8,000sqm of employment	The site is available and development is achievable. The site is considered suitable as development on the site would contribute to sustainable patterns of development, however it is dependant upon minimising impact on highways and air quality
		SAF11	commitment	Saffron Walden				
		SAF1	Commitment	Saffron Walden				
		SAF15	Safeguarded	Saffron Walden				
2015	01Sew15			Sewards End	E	C3	669	The site is available and development is achievable subject to appropriate highway mitigation measures. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	02Sew15			Sewards End	E	C3	50	The site is available and development is considered achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	03Sew15			Sewards End	E	C3	96	The site is not considered available as no evidence has been provided on all the owners and the availability of the whole site. Development of the site is considered achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	04Sew15			Sewards End	A	C3	3	The site is available and development is achievable. The site is considered suitable for low density development. The deliverable capacity has been amended to 3 dwellings.

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	05Sew15			Sewards End	E	C3	36	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	06Sew15			Sewards End	E	C3	5	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	07Sew15			Sewards End	E	C3	92	The site is available and development is achievable subject to highway access and mitigation measures. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015		STA3	Commitment	Stansted Mountfitchet			147	
2015		STA3	Commitment	Stansted Mountfitchet			53	
2015	01Sta15			Stansted Mountfitchet	E	C3	5	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	02Sta15			Stansted Mountfitchet	E	C3	68	The site is available and development is achievable. The site contributes to the functions of the Green Belt and therefore development is considered unsuitable
2015	03Sta15			Stansted Mountfitchet	E (employment)	Employment	7000-16000	The site is available and development is achievable. The site contributes to the functions of the Green Belt and therefore development is considered unsuitable.
2015	04Sta15			Stansted Mountfitchet	E (employment)	Employment	15000-32000	The site is available and development is achievable. The site contributes to the functions of the Green Belt and therefore development is considered unsuitable

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	05Sta15			Stansted Mountfitchet	E (employment)	Employment	13000-27000	The site is available and development is achievable. The site contributes to the functions of the Green Belt and therefore development is considered unsuitable.
2015	06Sta15			Stansted Mountfitchet	E	C3	5	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	07Sta15			Stansted Mountfitchet	C	C3	70	The site is available. Development is achievable and the site is suitable subject to the capacity of the highway network and any necessary highway mitigation measures.
2015	08Sta15			Stansted Mountfitchet	E	C3	5	The site is available and development is achievable. The site does contribute to the functions of the Green Belt is therefore development is considered unsuitable.
2015	09Sta15	STA1		Stansted Mountfitchet	B	C3	30	The site is available and considered suitable and development is achievable. The Deliverable capacity has been amended to reflect the allocation in the Regulation 18 Local Plan.
2015	10Sta15			Stansted Mountfitchet	E	C3	10	The site is available. Development of the site is not considered achievable due to the sites location within the poor air quality zone. The site is considered unsuitable and development on this site would not contribute to sustainable patterns of development
2015	11Sta15			Stansted Mountfitchet	E	C3	10	The site is available and development is achievable subject to the cost of removing the existing buildings. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	12Sta15			Stansted Mountfitchet	E	C3	300	The site is available and development is achievable subject to development avoiding land within flood zones 2 and 3. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	13Sta15			Stansted Mountfitchet	E	C3	800	The site is available and development is achievable subject to the provision of the necessary infrastructure to support the scale of development. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development
2015	14Sta15			Stansted Mountfitchet	E	C3	200	The site is available and development is achievable subject to highway improvements. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	15Sta15			Stansted Mountfitchet	E	C3	300	The site is available and development is achievable subject to educational infrastructure and development avoiding land with the flood zone 2 and 3. This site is considered unsuitable as development on this site would not contribute to sustainable patterns of development
2015	16Sta15	SA1		Stansted Mountfitchet	B (employment)	Employment	unknown	The site is available and considered suitable. Development of the site is achievable subject to highway capacity, cost of removal of existing buildings and workforce population density requirements around fuel farm.
2015	17Sta15			Stansted Mountfitchet	E	C3	50	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	18Sta15			Stansted Mountfitchet	E	C3	338	The site is available and development is achievable subject to highway improvements to access the site. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	19Sta15			Stansted Mountfitchet	E	C3	15	The site is available and development is achievable. The southern part of the site has permission for 3no dwellings which were approved as by reason of siting, design and appearance with no significant harm being caused to the rural amenities of the area. It is considered that the development of the whole site would harm the wider countryside and not contribute to a sustainable pattern of development
2015	20Sta15			Stansted Mountfitchet	E	C3	30	The site is available and development is achievable subject to development avoiding the areas at risk from flooding. The site contributes to the functions of the Green Belt and therefore development is considered unsuitable.
2015	21Sta15	STA4		Stansted Mountfitchet	B (employment)	Employment	1040	The site is available and suitable and development is achievable.
2015	22Sta15			Stansted Mountfitchet	E	C3	105	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	23Sta15			Stansted Mountfitchet	E	C3	68	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2016	24Sta16			Stansted Mountfitchet	D	C3	70	The site is available. Development is achievable and the site is suitable subject to the delivery of the site to the south (07Sta15), capacity of the highway network and any necessary highway mitigation measures. Due to the need for another to be delivered prior to this site becoming available and to highway constraints it is not considered that this site could be delivered within the plan period
2016	25Sta16			Stansted Mountfitchet	E	C3	900	The site is available and development is achievable subject to achieving access to the highway network. However the site is not considered suitable as development on this site would not contribute to sustainable patterns of development.
2016	26Sta16	STA5	Development Opportunity	Stansted Mountfitchet	A	c3	27	The site is deliverable for town centre uses including residential and has planning permission for 10 dwellings on part of the site. The achievability of development and availability of the remainder of the site is not known. Emerging Council policy supports the regeneration of this site. However the timing and scale of any residential development is unknown and therefore it is not relied upon in meeting the Council's housing need.
reg 18	27Sta17			Stansted Mountfitchet	E	C3	130	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
Reg 18	28Sta17			Stansted Mountfitchet	E	C3	50	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
		STA2	Commitment	Stansted Mountfitchet				
		STA3	Commitment	Stansted				

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
				Mountfitchet				
		STA6	Safeguarded	Stansted Mountfitchet				
2015	01Ste15			Stebbing	E	C3	10	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	02Ste15			Stebbing	E	C3	9	The site is available and development is achievable. The site is considered unsuitable as development of the site would not contribute to sustainable patterns of development.
2015	03Ste15			Stebbing	B	C3	6	The site is available and considered suitable and development is achievable.
2015	04Ste15			Stebbing	E	C3	6	The site is available and development is achievable. The site is considered unsuitable as development of the site would not contribute to sustainable patterns of development.
2015	05Ste15			Stebbing	new settlement	C3	7500	This site is being promoted as a village extension incorporating services and facilities. The site is available and development is achievable subject to assessment of the technical evidence. The promoters have submitted a range of technical reports which indicate that this site is achievable and deliverable. The Council's strategy is towards self-sustaining Garden Communities. The suitability of the site will be considered as part of the consideration of alternative new settlement sites taking into account the findings of the Sustainability Appraisal and the Council's evidence base.

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	06Ste15			Stebbing	new settlement	C3	4500	This site is being promoted as a village extension incorporating services and facilities. The site is available and development is achievable subject to assessment of the technical evidence. The promoters have submitted a range of technical reports which indicate that this site is achievable and deliverable. The Council's strategy is towards self-sustaining Garden Communities. The suitability of the site will be considered as part of the consideration of alternative new settlement sites taking into account the findings of the Sustainability Appraisal and the Council's evidence base.
2016	07Ste16			Stebbing	E	C3	17	The site is available and development is achievable but the site is considered unsuitable as development of the site would not contribute to sustainable patterns of development.
2016	08Ste16			Stebbing	E	C3	50	The site is available and development is achievable but the site is considered unsuitable as development of the site would not contribute to sustainable patterns of development
2016	09Ste16			Stebbing	E	C3	50	The site is available. Access to the site represents a major constraint to development of this site. The development of this site will also have an unacceptable impact on the landscape impact. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development
2016	10Ste16			Stebbing	E	C3	20	The site is available and development is achievable but the site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2016	11Ste16			Stebbing	E	C3	20	The site is available but development is not considered suitable or achievable due to the site being located within Flood Zones 2 and 3
		STE1	Commitment	Stebbing				
2015		TAK2	Commitment	Takeley			12	
2015	01Tak15	TAK1		Takeley	B	C3	20	The site is available and development is achievable and suitable. The deliverable capacity of the site reflects the allocation in the Regulation 18 Local Plan to prevent overdevelopment.
2015	02Tak15			Takeley	E	C3	11	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	03Tak15			Takeley	E	C3	11	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	04Tak15			Takeley	E	C3	48	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development
2015	05Tak15			Takeley	E	C3	6	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	06Tak15			Takeley	E	C3	17	The site is available. The site is not considered suitable nor is development considered achievable due to the site's location within flood zones 2 and 3

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	07Tak15			Takeley	E	C3	7	The site is available. Development is achievable subject to mitigating impact on listed buildings and cost of clearing the site. The site as a whole as submitted through the SHLAA is not considered suitable for development as it would lead to development in the Countryside Protection Zone and lead to development in a non sustainable location. Partial development of the site within development limits may be considered suitable. This falls below the criteria of the SHLAA and should be pursued through pre application advice and a planning application.
2015	08Tak15			Takeley	E	c3	200	The site is available and development is considered achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	09Tak15			Takeley	E	C3	750	The site is available and achievable subject to provision of necessary infrastructure. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	10Tak15			Takeley	E	C3	1500	The site is available and achievable subject to provision of necessary infrastructure. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	11Tak15			Takeley	E	C3	1700	The site is available and achievable subject to provision of necessary infrastructure. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	12Tak15			Takeley	E	C3	320	The site is available and development is achievable. The site contributes to the function of the Countryside protection Zone and therefore development is considered unsuitable.
2015	13Tak15			Takeley	E	C3	750	Part of the site is currently available with the availability of the remainder of the site still to be confirmed. The site is considered unsuitable because it will involve significant development within the Countryside Protection Zone and would not contribute to sustainable patterns of development.
2015	14Tak15			Takeley	E (employment)	C3	unknown	The land is available. Development of the site is achievable subject to providing access to strategic road network and mitigating impact of flood zones, and on heritage and natural assets. Development of the sites are not considered suitable because it would lead to coalescence between settlements and the airport contrary to the functions of the Countryside Protection Zone.
2015	15Tak15			Takeley	E	C3	50	The site is available and development is achievable subject to development and the access road avoiding land within flood zones 2 and 3. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	16Tak15			Takeley	E	C3	300	The site is available. Development is not achievable because the site, on its own, does not have access to the highway. The site is considered unsuitable because it will involve significant development within the Countryside Protection Zone and would not contribute to sustainable patterns of development
2015	17Tak15			Takeley	E	C3	128	The site is available and development is achievable. This site is considered unsuitable as development on this site would not contribute to sustainable patterns

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
								of development.
2016	18Tak16			Takeley	E (employment)	B1	10800	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2016	19Tak16			Takeley	E (employment)	B1	unknown	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2016	20Tak16			Takeley	E (employment)	Employment	unknown	The site is available and development is achievable. The site lies within the Countryside Protection Zone and would lead to coalescence with the airport and is therefore considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2016	21Tak16			Takeley	E (employment)	Employment	6000	The site is available and development is achievable. The site lies within the Countryside Protection Zone and would lead to coalescence with the airport and is therefore considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2017	22Tak17			Takeley	E		8	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
Reg 18	23Tak17			Takeley	E		40	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
		TAK3	Refurbishment	Takeley				
2015		THA2	Commitment	Thaxted			40	

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	01Tha15			Thaxted	E		6	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	02Tha15			Thaxted	E		8	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	03Tha15			Thaxted	E		6	The site is available and small scale development is achievable, however, this would be below the threshold of the SLAA. The site is considered unsuitable for larger scale development as it would not contribute to a sustainable pattern of development
2015	04Tha15			Thaxted	E		369	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development
2015	05Tha15			Thaxted	E		16	The site is available and development is achievable. The site is not considered suitable because it would lead to ribbon development extending into the open countryside.
2015	06Tha15			Thaxted	E		22	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development
2015	07Tha15			Thaxted	E		12	The site is available and development is achievable subject to the provision of a satisfactory access road. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	08Tha15			Thaxted	E		72	The site is available and development is achievable. The site is considered unsuitable as development of the site would not contribute to sustainable patterns of development.
2015	09Tha15			Thaxted	E		23	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	10Tha15	THA2		Thaxted	A	C3	29	The site is deliverable and has planning permission for 29 dwellings
2015	11Tha15			Thaxted	E		10	The site is available and development is achievable subject to to remediation of any contamination and providing suitable access road. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	12Tha15			Thaxted	E		5	The site is available and considered suitable. The development of the site is achievable subject to the cost of clearing and removing the existing buildings. The site is too small to be allocated for development within the Local Plan but it can be included within development limits.
2015	13Tha15			Thaxted	E		75	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	14Tha15	THA1		Thaxted	B	c3	20	The site is available and considered suitable. Development of the site is achievable subject to the cost of clearance and removal of existing buildings and mitigating the impact on listed buildings and the conservation area. The deliverable capacity has been reduced to reflect these constraints.

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	15Tha15			Thaxted	E		25	The site is available and considered to be achievable subject to flood mitigation measures. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	16Tha15			Thaxted	E		120	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	17Tha15	THA3	Safeguarded	Thaxted	E		25	The deliverability of this site is uncertain in respect of the Essex County Council's future plans for the site, impact on ecology and impact on highway network
2015	18Tha15			Thaxted	E		10	The site is available and development is achievable subject to mitigating impact on the conservation area, listed buildings and other buildings of merit. The site is considered unsuitable as development on this site would lead to the loss of an important open space and not contribute to sustainable patterns of development.
2015	19Tha15			Thaxted	E		18	The site is available and development is achievable. This site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	20Tha15			Thaxted	G&T		1	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	01Ugl15			Ugley	E		8	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	02Ugl15			Ugley	E		10	The site is proposed as a potential rural exception site, which would need community support and a proven need for local affordable housing. The site is available and development is considered achievable subject to mitigation measures to overcome the impact of the M11 and railway; and impact on the Ancient Woodland. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	03Ugl15			Ugley	E		12	The site is suitable and available and development is achievable subject to mitigation measures to overcome the impact of the M11. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	04Ugl15			Ugley	E		48	The site is available and development achievable. The site is considered unsuitable as development on this site for market housing would not contribute to sustainable patterns of development.
2015	05Ugl15			Ugley	E		21	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	01Wen15			Wendens Ambo	E		5	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	02Wen15			Wendens Ambo	E	C3	15	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
2015	02Wen15			Wendens Ambo	E (employment)	Employment	3000	The site is available and development is achievable. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
2015	01WRod15			White Roding	E		8	The site is available and development is achievable. The site contributes to the functions of the Green Belt and therefore development is considered unsuitable.
2015	01Wic15			Wicken Bonhunt	E		6	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	02Wic15			Wicken Bonhunt	E		7	The site is available. The achievability of the site is uncertain because parts of the site are located within flood zones 2 and 3. The achievability of the site depends of the outcome of a full flood risk assessment and consideration of mitigation measures. The site is considered unsuitable as development on this site would not contribute sustainable patterns of development.
Reg 18	03Wic17			Wicken Bonhunt	E		21	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development
2015	01Wid15			Widdington	E		6	The site is available and development is considered achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	02Wid15			Widdington	E		10	This site is available and development is achievable subject to cost of re-routing overhead electrical cable and mitigation against impact on protected lane. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of

Year submitted to the SLAA	SLAA reference number	Allocation reference	Status	Settlement	Suitability in SLAA	Submitted proposed use in SLAA	Conclusion of yield in SLAA	Conclusion
								development.
2015	01Wim15			Wimbish	E		12	The site is available and development is achievable. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	02Wim15			Wimbish	E		88	The site is available and development is achievable subject to highway improvements to Tindon End Road. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	03Wim15			Wimbish	E		115	The site is available and development is achievable subject to highway improvements to Tindon End Road. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
2015	04Wim15			Wimbish	E		5	The site is available and development is achievable subject to highway improvements to Tindon End Road. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.

SA of site options

Developing the appraisal methodology

Given the number of site options and limited site-specific data availability it was not possible to simply discuss ('qualitative analysis') the merits of each site option under the SA framework.⁸⁹

As such, work was undertaken to develop a methodology suited to site options appraisal, whilst also reflecting the SA framework and topics as best as possible. The methodology essentially involved employing GIS data-sets, and measuring ('quantitative analysis') how each site option related to various constraint and opportunity features.

Two GIS tools were used to undertake the appraisal of site options depending on the feature and measurements required. These provided either a:

- Straight line distance from a feature to a site option and percentage overlap of any features within a site option. Measurements were taken from the closest boundary of the site option and the feature.

or

Distances calculated from a site option to a feature along a real world network of roads and urban footpaths using Open Street Map. The network analyst tool helps to provide approximate real world walking distances. Measurements are taken from the boundary of the site where it is within 20m of the road/ footpath network and is therefore assumed to have access.

The site options appraisal methodology is presented in **Table A** below. It sets out the criteria and thresholds as well as the GIS tool used and provides further commentary as necessary. The table recognises data limitations. It is important to be clear that the aim of categorising the performance of site options is to aid differentiation, i.e. to highlight instances of site options performing relatively well/ poorly. The intention is not to indicate a 'significant effect'.⁹⁰

⁸⁹ Qualitative analysis of site options would only have been possible were time/resources available to generate data/understanding for all site options through site visits and discussion with promoters. Without this data/understanding, any attempt at qualitative analysis would have led to a risk of bias (e.g. sites that are being proactively promoted may have been found to perform favourably).

⁹⁰ Whilst Regulations require that the SA process identifies and evaluates significant effects of the draft plan and reasonable alternatives, there is no assumption that significant effects must be identified and evaluated for all site options considered.

Table IVB: Site options appraisal methodology

Criteria	'RAG' rules	Data and measurement	Commentary
Green Belt	R = Intersects G = Does not intersect	Data provided by the Uttlesford District Council. Straight line distance/ overlap measurement.	It is recognised that the Green Belt (GB) is a policy designation and has no bearing on the sustainability of a site. However, it is useful to flag sites that fall within the GB as this will be a consideration in future stages when establishing spatial strategy alternatives for consideration through plan-making and the SA process.
Settlement development limits	R = Does not intersect G = Intersects or is adjacent	Data provided by the Uttlesford District Council. Straight line distance/ overlap measurement.	Highlights those sites that fall outside the settlement development limits.
Development opportunity areas	A = Does not intersect G = Intersects or is adjacent	Data provided by the Uttlesford District Council. Straight line distance/ overlap measurement.	Highlights those sites that fall within or are adjacent to an identified development opportunity area.
Air Quality (SA Objectives 7 and 11)			
Air Quality Management Area (AQMA)	R = Within or adjacent A = <200m G = >200m	Data provided by Uttlesford Council. Straight line distance/ overlap measurement.	200m has been assumed to represent AQMA buffer zones as these are not individually defined.
Poor Air Quality Zone	R = Within or adjacent A = <200m G = >200m	Data provided by Uttlesford Council. Straight line distance/ overlap measurement.	200m has been assumed to represent an appropriate buffer for a Poor Air Quality Zone.
Biodiversity (SA Objective 1)			
European site (SAC, SPA or Ramsar site)	There are no European sites within or in close proximity to Uttlesford District Council. The HRA for the Regulation 19 Local Plan (Oct 2018) identified that there are seven European sites within the potential 'zone of influence' of the Local Plan. The HRA found that there is the potential for in combination effects with other plans and programmes on Epping Forest SAC as a result of increased recreational pressure and increased atmospheric pollution. It made a number of recommendations to address these issues and concluded that the Local Plan would not have adverse effects on the integrity of any European sites. Given the location of European sites and that in combination effects are the primary issue, the location of site options in relation to European sites is not an issue. As a result, a criterion relating to European sites has not been included.		
Site of Special Scientific Interest (SSSI)	R = <200m A = <1km G = >1km	Data provided by Natural England and includes sites lying outside of the District. Straight line distance/ overlap measurement.	As above, it is recognised that distance in itself is not a definitive guide to the likelihood or significance of effects on a European site. This criterion will help to highlight the SSSI that lies in closest proximity to the site and together with the criterion below for SSSI Impact Zones, it will help to differentiate between sites.

Criteria	'RAG' rules	Data and measurement	Commentary
SSSI Impact Risk Zones	<p>R = Within a SSSI IRZ where any planning application requires consultation with NE</p> <p>A = Within a SSSI IRZ</p> <p>G = Not within an SSSI IRZ</p>	Data provided by Natural England and includes sites lying outside of the District. Straight line distance/ overlap measurement.	<p>Impact Risk Zones (IRZs) are a GIS tool developed by Natural England to make a rapid initial assessment of the potential risks to SSSIs posed by development proposals. They define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. The IRZs also cover the interest features and sensitivities of European sites, which are underpinned by the SSSI designation and "Compensation Sites", which have been secured as compensation for impacts on Natura 2000/Ramsar sites.</p> <p>LPA's have a duty to consult Natural England before granting planning permission on any development that is in or likely to affect a SSSI. As such IRZs enable a consideration of whether a proposed development is likely to affect a SSSI and determine whether they will need to consult Natural England to seek advice on the nature of any potential SSSI impacts and how they might be avoided or mitigated.</p>
National Nature Reserve	<p>R = Includes or is adjacent</p> <p>A = <200m</p> <p>G = >200m</p>	Data provided by Natural England and includes sites lying outside of the District. Straight line distance/ overlap measurement.	There are two National Nature Reserves (NNRs) within the District. The RAG distances reflect this along with the assumption that these are of less significance and therefore less sensitive than European sites and SSSIs. However, it is recognised that the designations overlap in places.
Ancient Woodland	<p>R = Includes or is adjacent</p> <p>A = <50m</p> <p>G = >50m</p>	Data provided by Natural England and includes sites lying outside of the District. Straight line distance/ overlap measurement.	Ancient Woodlands are spread across the District. The RAG distances have been selected to take account of this and help differentiate between the sites options.
Local Wildlife Site	<p>R = Includes or is adjacent</p> <p>A = <50m</p> <p>G = >50m</p>	Data provided by Uttlesford District Council and does not include sites lying outside of the District. Straight line distance/ overlap measurement.	There are a number of Local Wildlife Sites situated within the District and the RAG distances reflect this along with the assumption that these are of less significance and therefore less sensitive than internationally and nationally designated biodiversity.
Priority habitats	<p>R = Includes or is adjacent</p> <p>A = <50m</p> <p>G = >50m</p>	Data provided by Natural England and includes sites lying outside of the District. Straight line distance/ overlap measurement.	This seeks to flag if a development at a site could result in the loss of and therefore fragmentation of BAP priority habitats. It also helps to flag if there is the potential for disturbance to priority habitats within 50m of the site.
Special verges	<p>R = Includes or is adjacent</p> <p>A = <50m</p> <p>G = >50m</p>	Data provided by Uttlesford District Council and does not include sites lying outside of the District. Straight line distance/ overlap measurement.	This seeks to flag if a development at a site could result in the loss of special verges. It also helps to flag if there is the potential for disturbance to special verges within 50m of the site.

Criteria	'RAG' rules	Data and measurement	Commentary
Important Woodland	R = Includes or is adjacent A = <50m G = >50m	Data provided by Uttlesford District Council and does not include sites lying outside of the District. Straight line distance/ overlap measurement.	This seeks to flag if a development at a site could result in the loss of important woodland. It also helps to flag if there is the potential for disturbance to important woodland within 50m of the site.
Geological sites	R = Includes or is adjacent A = <50m G = >50m	Data provided by Uttlesford District Council and does not include sites lying outside of the District. Straight line distance/ overlap measurement.	This seeks to flag if a development at a site could result in the loss of a geological site. It also helps to flag if there is the potential for disturbance to a geological site within 50m of the site.
Climate Change (SA Objectives 6 and 8)			
Groundwater flood risk	R = Greater than 75% A = Greater than 25% and less than 75% G = Lower than 25%	Data provided by Uttlesford District Council. Straight line distance/ overlap measurement.	This criterion will help to identify sites that fall within areas at risk of groundwater flooding.
Surface water flood risk	R = Areas of high or very high surface water flood risk is present in the site A = Areas of medium surface water flood risk is present in the site G = Areas of low or no surface water flood risk	Data provided by Uttlesford District Council. Straight line distance/ overlap measurement.	This criterion will help to identify sites that fall within areas at risk of surface water flooding. N.B. While it is important to avoid development in areas of high flood risk, there is the potential to address risk of surface water flooding at the development management stage through the use of appropriate mitigation, such as SuDS.
Fluvial flood risk	R = > 50% intersects with Flood risk zone 2 or 3 A = < 50% intersects with Flood risk zone 2 or 3 G = Flood risk zone 1	Data provided by the Environment Agency. Straight line distance/ overlap measurement.	This criterion will help to identify sites that fall within high flood risk areas. N.B. While it is important to avoid development in flood zones, there is the potential to address flood risk at the development management stage, when a 'sequential approach' can be taken to ensure that uses are compatible with flood risk. There is also the potential to design-in Sustainable Drainage Systems (SuDS).
Community and Wellbeing (SA Objectives 10 and 11)			
Town or Local Centre	R = >800m A = 400-800m G = <400m	Data provided by Uttlesford District Council and does not include features outside the District. Network analyst	Highlights walking distance to town and local centres. There is no clear guidance on distance thresholds, and it is recognised that town centres will often be reached by car or public transport. The thresholds therefore reflect the spread of the data.

Criteria	'RAG' rules	Data and measurement	Commentary
		measurement.	
Retail centres	R = >800m A = 400-800m G = <400m	Data provided by Uttlesford District Council and does not include features outside the District. Network analyst measurement.	Highlights walking distance to a retail centre (primary and secondary frontages). There is no clear guidance on distance thresholds, and it is recognised that these facilities will often be reached by car or public transport. The thresholds therefore reflect the spread of the data.
Primary School	R = >800m A = 400-800m G = <400m	Data provided by Uttlesford District Council and does not include features outside the District. Network analyst measurement.	Highlights walking distance to primary schools. Thresholds reflect the statutory walking distances set out in Education Act (1996) and the Home to school travel and transport guidance (2014).
Secondary School	R = >4.8km A = <4.8km G = <1km	Data provided by Uttlesford District Council and does not include features outside the District. Network analyst measurement.	Highlights walking distance to a secondary school. Thresholds reflect the statutory walking distances set out in Education Act (1996) and the Home to school travel and transport guidance (2014).
Hospital/ Surgery/ Community Hospital	R = >800m A = 400-800m G = <400m	Data provided by Uttlesford District Council and does not include features outside the District. Network analyst measurement.	Highlights walking distance to hospitals and GPs. Department for Transport guidance ⁹¹ suggests 800m as a walkable distance for those accessing community facilities.
Open/ Green space	R = >400m A = <400m G = Adjacent	Data provided by Uttlesford District Council and includes features outside the District. Network analyst measurement.	Highlights the walking distance of site options to areas of open and green space. It is recognised that there may be other areas of open or green space that are not considered through this criterion. 400m is assumed to be a walkable distance for most.
Open/ Green space (loss)	R = Loss of open or green space G = No loss of open or green space	Data provided by Uttlesford District Council. Straight line distance/ overlap measurement.	The presumption is that a loss of open or green space will lead to a negative impact in relation to a range of SA topics. However it should be noted that some loss of open space may not necessarily be a negative effect if green infrastructure enhancements are initiated on-site or nearby but this is uncertain at this stage
Cycle Routes	A = >50m G = <50m	Data provided by Essex County Council. Straight line distance/ overlap measurement.	Highlights the proximity of site options to a National Cycle Route.
Sport Facility/ Pitch	R = >800m	Data provided by Uttlesford District	Highlights walking distance to a sports facility or pitch. Department for Transport guidance ⁹²

⁹¹ Ibid

Criteria	'RAG' rules	Data and measurement	Commentary
	A = 400-800m G = <400m	Council and does not include features outside the District. Network analyst measurement.	suggests 800m as a walkable distance for those accessing community facilities.
Public right of way (PRoW)?	A = >50m G = <50m	Data provided by Harlow Council and does not include features outside the District. Network analyst measurement.	Highlights the proximity of site options to PRoW. Where a PRoW falls within a site it is assumed that this can be retained or an alternative route provided to ensure that links are not severed. It is also assumed that the closer a development is to a PRoW the more likely there is for an opportunity to enhance.
Deprivation	R = Site does not intersect with an 'output area' that is relatively deprived A = Any of the site intersects with an 'output area' that is relatively deprived i.e. in the 20-40% (2nd quintile) most deprived in the district. G = Any of the site intersects with an 'output area' that is relatively deprived (i.e. in the 0-20% (1st quintile) most deprived in the district	Data provided by Ministry of Housing, Communities and Local Government and includes features outside the District. Straight line distance/ overlap measurement.	Highlights site options that fall within an area of deprivation. Development in an area of relative deprivation (as measured by the Index of Multiple Deprivation) may support regeneration. However, it is recognised that this will be dependent on a variety of factors, including the level of improvements delivered in terms of community facilities.
Stanstead Airport Public Safety Zone	R = Intersects with 1:10,000 contour A = Intersects with 1:100,000 contour G = Does not intersect	Data provided by Uttlesford District Council. Straight line distance/ overlap measurement.	Highlights those site options that fall within Stanstead Airport's Public Safety Zones.
Noise contours	R = Intersects with 72, 69 or 66 noise contour A = Intersects with 63, 60 or		

⁹² Ibid.

Criteria	'RAG' rules	Data and measurement	Commentary
	57 noise contour G = Outside of noise contours		
Economy and employment (SA Objective 15)			
Loss of existing employment	R = Loss of existing designated employment site G = No loss of designated employment site	Data provided by Uttlesford District Council. Straight line distance/ overlap measurement.	Considers the loss of an existing or allocated employment area.
Existing employment area	R = >800m A = 400-800m G = <400m	Data provided by Uttlesford District Council and does not include features outside the District. Network analyst measurement.	Highlights walking distance to existing employment areas. There is no clear guidance on distance thresholds, and it is recognised that these facilities will often be reached by car or public transport. The thresholds therefore reflect the spread of the data.
Historic Environment (SA Objective 5)			
Conservation Area	R = Intersects or is adjacent A = <50m G = >50m	Data provided by Uttlesford District Council and does not include conservation areas outside the District. Straight line distance/ overlap measurement.	<p>It is appropriate to 'flag' a red where a site is within, intersects or is adjacent to a Conservation Area. It is also appropriate to flag sites that might more widely impact on the setting of a Conservation Area and a 50m threshold has been assumed. It is recognised that distance in itself is not a definitive guide to the likelihood or significance of effects on a heritage asset. It is also recognised that the historic environment encompasses more than just designated heritage assets.</p> <p>Whilst there is good potential to highlight where development in proximity to a heritage asset might impact negatively on that asset, or its setting, a limitation relates to the fact that it has not been possible to gather views from heritage specialists on sensitivity of assets / capacity to develop each of the sites. This is a notable limitation as potential for development to conflict with the setting of historic assets / local historic character can only really be considered on a case-by-case basis rather than through a distance based criteria. It will also sometimes be the case that development can enhance heritage assets.</p>
Historic Park or Garden	R = Adjacent A = <50m G = >50m	Data provided by Historic England and includes assets lying outside of the District. Straight line distance/ overlap measurement.	As above.

Criteria	'RAG' rules	Data and measurement	Commentary
Scheduled Monument	R = Intersects or is adjacent A = <50m G = >50m	Data provided by Historic England and includes assets lying outside of the District. Straight line distance/ overlap measurement.	As above.
Listed Building	R = Intersects or is adjacent A = <50m G = >50m	Data provided by Historic England and includes assets lying outside of the District. Straight line distance/ overlap measurement.	As above.
Protected Lanes	R = Intersects G = Does not intersect	Data provided by Uttlesford District Council and does not include features outside the District. Straight line distance/ overlap measurement.	As above.
Land and Waste (SA Objective 4)			
Land classification	A = Greenfield G = Brownfield or mixed	Data provided by Uttlesford District Council. Straight line distance/ overlap measurement.	Highlights whether the site is a previously developed or greenfield site as defined by the NPPF/NPPG.
Agricultural land classification	R = Grade 1 to 3 A = Grade 4 or 5 G = Urban	Data provided by Natural England. Straight line distance/ overlap measurement.	Recent land classification has not been undertaken in many parts of the District. As such the pre-1988 classification is the only means of consistently comparing sites. This does not however provide a distinction between Grade 3a (i.e. land classified as the 'best and most versatile') and Grade 3b land (i.e. land which is not classified as such). Taking the above into account it is appropriate to 'flag' red those sites that may include Grade 1 to 3 agricultural land.
Mineral safeguarded site	A = Intersects G = Does not intersect	Data provided by Uttlesford District Council. Straight line distance/ overlap measurement.	It is assumed that any development outside of a mineral safeguarded site would not result in the sterilisation of that resource and the RAG distances reflect this.
Landscape (SA Objective 3)			
Countryside Protection Zone	R = Intersects G = Does not intersect	Data provided by Uttlesford District Council. Straight line distance/ overlap measurement.	It is appropriate to 'flag' a red where a site falls within the Countryside Protection Zone (CPZ) .

Criteria	'RAG' rules	Data and measurement	Commentary
Tree Preservation Order	R = Intersects G = Does not intersect	Data provided by Uttlesford District Council and does not include features outside the District. Straight line distance/ overlap measurement.	Highlights if a site contains any Tree Preservation Orders (TPOs).
Protected Open Space	R = Intersects G = Does not intersect	Data provided by Uttlesford District Council. Straight line distance/ overlap measurement.	It is appropriate to 'flag' a red where a site falls could result in the loss of protected open space.
Transport (SA Objective 9)			
Bus stop	R = >400m G = <400m	Data provided by Essex County Council and includes features outside the District. Network analyst measurement.	Highlights walking distance to a bus stop. Department for Transport guidance ⁹³ suggests 400m as a walkable distance for those accessing a bus stop.
Train station	A = >800m G = <800m	Data provided by Uttlesford District Council and includes features outside the District. Network analyst measurement.	Highlights walking distance to a train station. Department for Transport guidance ⁹⁴ does not suggest a walkable distance for a train station so it is assumed that 800m is appropriate. This is in line with what is suggested for access to community facilities.
Water (SA Objective 2)			
Groundwater Source Protection Zones	R = Within a Zone 1 SPZ A = Within a Zone 2 SPZ G = Not within a SPZ	Data provided by the Environment Agency. Straight line distance/ overlap measurement.	Groundwater Source Protection Zones are designated zones around public water supply abstractions and other sensitive receptors that signal there are particular risks to the groundwater source they protect. The zones are based on an estimation of the time it would take for a pollutant which enters the saturated zone of an aquifer to reach the source abstraction or discharge point. For each source, three zones are defined around a particular water abstraction based on travel times, of the groundwater (Zone 1 = 50 days; Zone 2 = 400 days) and the total catchment area of the abstraction (Zone 3).

⁹³ WebTag (December 2015) Unit A4.2 paragraph 6.4.5, Department for Transport

⁹⁴ Ibid

Appraisal findings

Tables IVC and **IVD** present appraisal findings in relation to the site options that have been a focus of plan-making. Specifically, the tables present an appraisal of the site options in terms of the appraisal criteria set out in Table A, with performance categorised on a simple ‘RAG’ scale. For completeness, all of the sites submitted through the Call for Sites and considered through the SLAA have been subjected to appraisal through the SA process.

Given the number of criteria the findings have been split into two tables. If there is a (E) after the site reference that means that the sites was submitted for employment uses, if there is a (G&T) after the site reference that means the site was submitted for Gypsy and Traveller uses. All other sites were submitted for residential uses.

Table IVC: Site options appraisal findings

Site Ref	Parish/ Settlement	Green Belt	Settlement Development Limit	Development Opportunity Area	AQMA	Poor Air Quality Zone	SSSI	SSSI Impact Risk Zone	National Nature Reserve	Ancient Woodland	Local Nature Reserve	Local Wildlife Site	Priority Habitat	Special Verge	Important Woodland	Geological Site	Surface Water Flood Risk	Groundwater Flood Risk	Fluvial Flood Risk	Conservation Area	Registered Park and Garden	Scheduled Monument	Listed Building	Protected Lane	Greenfield/ Brownfield	Agricultural Land Classification	Mineral Safeguarding Area	Countryside Protection Zone	Tree Preservation Order	Protected Open Space	Groundwater Source Protection Zone
01Ark15	Arkesden	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
02Ark17	Arkesden	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Yellow
01Ash15	Ashdon	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green
02Ash15	Ashdon	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Red	Green	Red	Green	Red	Green	Yellow	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green
01Bar15	Barnston	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green
02Bar15	Barnston	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green
01Bir15	Birchanger	Red	Green	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green
02Bir15 (E)	Birchanger	Red	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Red	Green	Green	Green	Red	Yellow	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green
03Bir15	Birchanger	Red	Green	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green
04Bir15	Birchanger	Red	Green	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green
05Bir15	Birchanger	Red	Green	Yellow	Green	Red	Green	Yellow	Green	Red	Red	Red	Red	Red	Red	Green	Red	Yellow	Yellow	Green	Green	Green	Green	Green	Red	Red	Green	Red	Green	Green	Green
06Bir15 (E)	Birchanger	Red	Red	Yellow	Green	Green	Green	Yellow	Green	Red	Red	Red	Red	Red	Red	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Red
07Bir16 (E)	Birchanger	Red	Red	Yellow	Green	Yellow	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Green	Green	Green	Green	Green

Page 326

Site Ref	Parish/ Settlement	Green Belt	Settlement Development Limit	Development Opportunity Area	AQMA	Poor Air Quality Zone	SSSI	SSSI Impact Risk Zone	National Nature Reserve	Ancient Woodland	Local Nature Reserve	Local Wildlife Site	Priority Habitat	Special Verge	Important Woodland	Geological Site	Surface Water Flood Risk	Groundwater Flood Risk	Fluvial Flood Risk	Conservation Area	Registered Park and Garden	Scheduled Monument	Listed Building	Protected Lane	Greenfield/ Brownfield	Agricultural Land Classification	Mineral Safeguarding Area	Countryside Protection Zone	Tree Preservation Order	Protected Open Space	Groundwater Source Protection Zone
08Bir16 (E)	Birchanger	Red	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Red	Green	Green	Green	Red	Yellow	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Green	Green	Green	Green
09Bir16	Birchanger	Red	Red	Yellow	Green	Red	Green	Green	Green	Red	Green	Red	Red	Green	Red	Green	Red	Yellow	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Green	Red	Green	Green
10Bir17	Birchanger	Red	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Green	Green	Green	Green
01Chr15	Chrishall	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	Yellow	Green	Green	Green	Green	Green	Green	Red	Yellow	Green	Green	Green	Yellow
01Cla15	Clavering	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Green	Green	Green	Green
02Cla15	Clavering	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Red	Yellow	Green	Green	Green	Green
03Cla15	Clavering	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Red	Green	Green	Green	Green	Green	Red	Yellow	Green	Green	Green	Green
04Cla15	Clavering	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Green	Green	Green	Yellow
05Cla15	Clavering	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Green	Green	Green	Green
06Cla15	Clavering	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Yellow	Green	Green	Green	Red	Green	Yellow	Red	Green	Green	Green	Green	Green	Red	Yellow	Green	Red	Green	Green
07Cla15	Clavering	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Green	Green	Green	Green
08Cla15	Clavering	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Red	Green	Green	Green	Green	Green	Red	Yellow	Green	Green	Green	Green
09Cla15	Clavering	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Red	Green	Green	Green	Green	Green	Red	Yellow	Green	Green	Green	Green
10Cla15	Clavering	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Red	Green	Green	Green	Green	Green	Red	Yellow	Green	Green	Green	Green
11Cla15	Clavering	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Red	Green	Green	Green	Green	Green	Red	Yellow	Green	Green	Green	Green
12Cla15	Clavering	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Green	Green	Green	Green
13Cla15	Clavering	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Red	Green	Green	Green	Green	Green	Red	Yellow	Green	Green	Green	Green
14Cla15	Clavering	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Red	Green	Green	Green	Green	Green	Red	Yellow	Green	Green	Green	Green
15Cla15 (E)	Clavering	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Red	Green	Green	Green	Green	Green	Red	Yellow	Green	Green	Green	Green
16Cla15	Clavering	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Red	Green	Green	Green	Green	Green	Red	Yellow	Green	Green	Green	Green
17Cla15	Clavering	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Red	Green	Green	Green	Green	Green	Red	Yellow	Green	Green	Green	Green

Site Ref	Parish/ Settlement	Green Belt	Settlement Development Limit	Development Opportunity Area	AQMA	Poor Air Quality Zone	SSSI	SSSI Impact Risk Zone	National Nature Reserve	Ancient Woodland	Local Nature Reserve	Local Wildlife Site	Priority Habitat	Special Verge	Important Woodland	Geological Site	Surface Water Flood Risk	Groundwater Flood Risk	Fluvial Flood Risk	Conservation Area	Registered Park and Garden	Scheduled Monument	Listed Building	Protected Lane	Greenfield/ Brownfield	Agricultural Land Classification	Mineral Safeguarding Area	Countryside Protection Zone	Tree Preservation Order	Protected Open Space	Groundwater Source Protection Zone			
18Cla15	Clavering																																	
19Cla15	Clavering																																	
20Cla15	Clavering																																	
21Cla15	Clavering																																	
22Cla15	Clavering																																	
23Cla15	Clavering																																	
04Deb15 (E &T)	Debden																																	
02Deb15	Debden																																	
03Deb15	Debden																																	
04Deb15	Debden																																	
05Deb15 (E)	Debden																																	
01Elm15	Elmdon																																	
01Els15 (E)	Elsenham																																	
02Els15	Elsenham																																	
03Els15	Elsenham																																	
04Els15	Elsenham																																	
05Els15 (E)	Elsenham																																	
06Els15 (E)	Elsenham																																	
06Els15 (E)	Elsenham																																	
06Els15_Merge (E)	Elsenham																																	

Site Ref	Parish/ Settlement	Green Belt	Settlement Development Limit	Development Opportunity Area	AQMA	Poor Air Quality Zone	SSSI	SSSI Impact Risk Zone	National Nature Reserve	Ancient Woodland	Local Nature Reserve	Local Wildlife Site	Priority Habitat	Special Verge	Important Woodland	Geological Site	Surface Water Flood Risk	Groundwater Flood Risk	Fluvial Flood Risk	Conservation Area	Registered Park and Garden	Scheduled Monument	Listed Building	Protected Lane	Greenfield/ Brownfield	Agricultural Land Classification	Mineral Safeguarding Area	Countryside Protection Zone	Tree Preservation Order	Protected Open Space	Groundwater Source Protection Zone	
07Els15 (E)	Elsenham																															
07Els15 (E)	Elsenham																															
07Els15_Merge (E)	Elsenham																															
08Els15	Elsenham																															
09Els15	Elsenham																															
10Els16 (E)	Elsenham																															
01Els17	Elsenham																															
01Far15	Farnham																															
02Far15	Farnham																															
03Far15	Farnham																															
04Far15	Farnham																															
01Fel15	Felsted																															
03Fel15 (E)	Felsted																															
04Fel15	Felsted																															
05Fel15	Felsted																															
06Fel15	Felsted																															
07Fel15	Felsted																															
08Fel15	Felsted																															
09Fel15	Felsted																															
10Fel15	Felsted																															

Site Ref	Parish/ Settlement	Green Belt	Settlement Development Limit	Development Opportunity Area	AQMA	Poor Air Quality Zone	SSSI	SSSI Impact Risk Zone	National Nature Reserve	Ancient Woodland	Local Nature Reserve	Local Wildlife Site	Priority Habitat	Special Verge	Important Woodland	Geological Site	Surface Water Flood Risk	Groundwater Flood Risk	Fluvial Flood Risk	Conservation Area	Registered Park and Garden	Scheduled Monument	Listed Building	Protected Lane	Greenfield/ Brownfield	Agricultural Land Classification	Mineral Safeguarding Area	Countryside Protection Zone	Tree Preservation Order	Protected Open Space	Groundwater Source Protection Zone
	(Bartholomew Green)		Red	Yellow				Yellow					Yellow													Red	Yellow				
07GtCan17	Great Canfield		Red	Yellow				Yellow									Red								Yellow	Red	Yellow				
01GtCan15 (G&T)	Gt Canfield		Red	Yellow				Yellow					Yellow												Yellow	Red	Yellow				
02GtCan15	Gt Canfield		Red	Yellow				Yellow									Red								Yellow	Red	Yellow				
03GtCan15	Gt Canfield		Red	Yellow				Yellow									Red								Yellow	Red	Yellow				
04GtCan15	Gt Canfield		Red	Yellow				Yellow				Red	Yellow				Red								Yellow	Red	Yellow				
05GtCan15	Gt Canfield		Red	Yellow				Yellow					Red				Red								Yellow	Red	Yellow				
06GtCan17	Gt Canfield		Red	Yellow				Yellow				Red	Red				Red								Yellow	Red	Yellow				
01GtChe15	Gt Chesterford		Red	Yellow		Yellow		Yellow									Yellow	Yellow							Yellow	Red	Yellow				
02GtChe15	Gt Chesterford		Red	Yellow				Yellow									Red	Yellow	Yellow			Red			Yellow	Red	Yellow				
03GtChe15	Gt Chesterford		Red	Yellow				Yellow				Yellow		Yellow						Red					Yellow	Red	Yellow		Red		
04GtChe15	Gt Chesterford		Red	Yellow				Yellow									Yellow	Yellow			Red				Yellow	Red	Yellow				
05GtChe15	Gt Chesterford		Red	Yellow				Yellow									Yellow	Yellow							Yellow	Red	Yellow				
06GtChe15	Gt Chesterford		Red	Yellow				Yellow									Red	Yellow	Yellow			Red			Yellow	Red	Yellow				
07GtChe15	Gt Chesterford		Red	Yellow				Yellow					Red	Yellow			Yellow	Yellow							Yellow	Red	Yellow		Red		Yellow
08GtChe15 (E)	Gt Chesterford		Red	Yellow				Yellow				Red	Red	Red			Yellow	Yellow							Yellow	Red	Yellow				Yellow
09GtChe15	Gt Chesterford		Red	Yellow				Yellow									Yellow	Yellow							Yellow	Red	Yellow				Yellow
10GtChe15 (E)	Gt Chesterford		Red	Yellow				Yellow				Red	Red	Red	Red		Yellow	Yellow	Yellow						Yellow	Red	Yellow				Yellow

Site Ref	Parish/ Settlement	Green Belt	Settlement Development Limit	Development Opportunity Area	AQMA	Poor Air Quality Zone	SSSI	SSSI Impact Risk Zone	National Nature Reserve	Ancient Woodland	Local Nature Reserve	Local Wildlife Site	Priority Habitat	Special Verge	Important Woodland	Geological Site	Surface Water Flood Risk	Groundwater Flood Risk	Fluvial Flood Risk	Conservation Area	Registered Park and Garden	Scheduled Monument	Listed Building	Protected Lane	Greenfield/ Brownfield	Agricultural Land Classification	Mineral Safeguarding Area	Countryside Protection Zone	Tree Preservation Order	Protected Open Space	Groundwater Source Protection Zone	
02GtChe15	Gt Chesterford zone 2																															
02GtChe15	Gt Chesterford zone 4																															
02GtChe15	Gt Chesterford zones 3																															
02GtChe15_M edge	Gt Chesterford zones 3																															
03GtDun15	Gt Dunmow																															
02GtDun15	Gt Dunmow																															
03GtDun15 (E)	Gt Dunmow																															
04GtDun15	Gt Dunmow																															
05GtDun15	Gt Dunmow																															
06GtDun15	Gt Dunmow																															
07GtDun15	Gt Dunmow																															
08GtDun15	Gt Dunmow																															
09GtDun15	Gt Dunmow																															
10GtDun15	Gt Dunmow																															
11GtDun15	Gt Dunmow																															
12GtDun15	Gt Dunmow																															
13GtDun15	Gt Dunmow																															

Page 33

Site Ref	Parish/ Settlement	Green Belt	Settlement Development Limit	Development Opportunity Area	AQMA	Poor Air Quality Zone	SSSI	SSSI Impact Risk Zone	National Nature Reserve	Ancient Woodland	Local Nature Reserve	Local Wildlife Site	Priority Habitat	Special Verge	Important Woodland	Geological Site	Surface Water Flood Risk	Groundwater Flood Risk	Fluvial Flood Risk	Conservation Area	Registered Park and Garden	Scheduled Monument	Listed Building	Protected Lane	Greenfield/ Brownfield	Agricultural Land Classification	Mineral Safeguarding Area	Countryside Protection Zone	Tree Preservation Order	Protected Open Space	Groundwater Source Protection Zone	
14GtDun15	Gt Dunmow																															
15GtDun15	Gt Dunmow																															
16GtDun15	Gt Dunmow																															
17GtDun15	Gt Dunmow																															
18GtDun15	Gt Dunmow																															
19GtDun16	Gt Dunmow																															
20GtDun16	Gt Dunmow																															
21GtDun17	Gt Dunmow																															
03GtEas15	Gt Easton																															
02GtEas15	Gt Easton																															
04GtEas15	Gt Easton																															
01GtHal15	Gt Hallingbury																															
02GtHal15	Gt Hallingbury																															
03GtHal15	Gt Hallingbury																															
04GtHal15 (E)	Gt Hallingbury																															
05GtHal15 (E)	Gt Hallingbury																															
06GtHal16	Gt Hallingbury																															
07GtHal16 (E)	Gt Hallingbury																															
08GtHal16 (E)	Gt Hallingbury																															
09GtHal16 (E)	Gt Hallingbury																															
01GtSam15	Gt Sampford																															

Site Ref	Parish/ Settlement	Green Belt	Settlement Development Limit	Development Opportunity Area	AQMA	Poor Air Quality Zone	SSSI	SSSI Impact Risk Zone	National Nature Reserve	Ancient Woodland	Local Nature Reserve	Local Wildlife Site	Priority Habitat	Special Verge	Important Woodland	Geological Site	Surface Water Flood Risk	Groundwater Flood Risk	Fluvial Flood Risk	Conservation Area	Registered Park and Garden	Scheduled Monument	Listed Building	Protected Lane	Greenfield/ Brownfield	Agricultural Land Classification	Mineral Safeguarding Area	Countryside Protection Zone	Tree Preservation Order	Protected Open Space	Groundwater Source Protection Zone	
02GtSam15	Gt Sampford																															
01Had15	Hadstock																															
01HBO15 (E)	Hatfield Broad Oak																															
02HBO15	Hatfield Broad Oak																															
05HBO15	Hatfield Broad Oak																															
06HBO15	Hatfield Broad Oak																															
07HBO15	Hatfield Broad Oak																															
08HBO17	Hatfield Broad Oak																															
03HBO15 (E)	Hatfield Broad Oak (Takeley)																															
04HBO15 (E)	Hatfield Broad Oak (Takeley)																															
01HHea15	Hatfield Heath																															
02HHea15	Hatfield Heath																															
03HHea15	Hatfield Heath																															
04HHea15	Hatfield Heath																															
05HHea15	Hatfield Heath																															

Page 33/34

Site Ref	Parish/ Settlement	Green Belt	Settlement Development Limit	Development Opportunity Area	AQMA	Poor Air Quality Zone	SSSI	SSSI Impact Risk Zone	National Nature Reserve	Ancient Woodland	Local Nature Reserve	Local Wildlife Site	Priority Habitat	Special Verge	Important Woodland	Geological Site	Surface Water Flood Risk	Groundwater Flood Risk	Fluvial Flood Risk	Conservation Area	Registered Park and Garden	Scheduled Monument	Listed Building	Protected Lane	Greenfield/ Brownfield	Agricultural Land Classification	Mineral Safeguarding Area	Countryside Protection Zone	Tree Preservation Order	Protected Open Space	Groundwater Source Protection Zone		
06HHea15	Hatfield Heath	Red	Green	Yellow				Yellow									Red	Yellow							Yellow	Red	Yellow						
07HHea15	Hatfield Heath	Red	Green	Yellow				Yellow																		Yellow	Red	Yellow					
08HHea17	Hatfield Heath	Red	Green	Yellow				Yellow									Red									Green	Red						
09HHea17	Hatfield Heath	Red	Green	Yellow				Yellow					Red					Yellow								Yellow	Red		Red				
01Hen15	Henham	Green	Red	Yellow				Yellow					Yellow				Red	Yellow							Green	Red	Yellow						
02Hen15	Henham	Green	Green	Yellow				Yellow									Red			Red					Yellow	Red	Yellow						
03Hen15	Henham	Green	Red	Yellow				Yellow					Yellow							Yellow					Green	Red	Yellow						
04Hen15	Henham	Green	Green	Yellow				Yellow									Red								Green	Red	Yellow						
05Hen15	Henham	Green	Green	Yellow				Yellow									Red								Green	Red	Yellow						
06Hen15	Henham	Green	Red	Yellow			Yellow					Yellow	Red											Red	Green	Red	Yellow						
07Hen16	Henham	Green	Green	Yellow				Yellow																	Yellow	Red	Yellow						
08Hen17	Henham	Green	Green	Yellow				Yellow												Red					Yellow	Red	Yellow						
01HEas15	High Easter	Green	Red	Yellow			Red						Yellow												Yellow	Red	Yellow						
02HEas15	High Easter	Green	Green	Yellow				Yellow									Yellow				Red				Yellow	Red	Yellow						
01HRod15	High Roding	Green	Green	Yellow				Yellow									Yellow				Red				Yellow	Red	Yellow						
02HRod15	High Roding	Green	Green	Yellow				Yellow									Yellow				Red				Yellow	Red	Yellow						
03HRod15	High Roding	Green	Green	Yellow				Yellow									Yellow				Red				Yellow	Red	Yellow						
04HRod16	High Roding	Green	Green	Yellow				Yellow									Yellow				Red				Yellow	Red	Yellow						
01Lan15	Langley	Green	Red	Yellow				Yellow									Red								Yellow	Red	Yellow			Red			
02Lan15	Langley	Green	Red	Yellow				Yellow																	Yellow	Red	Yellow						
03Lan15	Langley	Green	Red	Yellow				Yellow																	Yellow	Red	Yellow						

Site Ref	Parish/ Settlement	Green Belt	Settlement Development Limit	Development Opportunity Area	AQMA	Poor Air Quality Zone	SSSI	SSSI Impact Risk Zone	National Nature Reserve	Ancient Woodland	Local Nature Reserve	Local Wildlife Site	Priority Habitat	Special Verge	Important Woodland	Geological Site	Surface Water Flood Risk	Groundwater Flood Risk	Fluvial Flood Risk	Conservation Area	Registered Park and Garden	Scheduled Monument	Listed Building	Protected Lane	Greenfield/ Brownfield	Agricultural Land Classification	Mineral Safeguarding Area	Countryside Protection Zone	Tree Preservation Order	Protected Open Space	Groundwater Source Protection Zone	
01LRod15	Leaden Roding	Red	Red	Yellow													Red								Yellow	Red						
02LRod15	Leaden Roding	Red	Green	Yellow													Red									Yellow	Red					
03LRod15	Leaden Roding	Red	Green	Yellow													Red									Yellow	Red					
04LRod15	Leaden Roding	Red	Green	Yellow													Red									Yellow	Red					
05LRod15	Leaden Roding	Red	Green	Yellow													Red									Yellow	Red					
01Lin15	Lindsell	Green	Red	Yellow				Yellow																		Yellow	Red	Yellow				
02Lin15	Lindsell	Green	Red	Yellow				Yellow																		Yellow	Red	Yellow				
03Lin15	Lindsell	Green	Red	Yellow													Red									Yellow	Red	Yellow				
04Lin15	Lindsell	Green	Red	Yellow									Red													Yellow	Red	Yellow				
01LtCan15	Little Canfield	Green	Red	Yellow				Yellow									Red	Yellow								Yellow	Red	Yellow	Red			
02LtCan15	Little Canfield	Green	Green	Yellow								Red	Red													Yellow	Red	Yellow	Red			
03LtCan15	Little Canfield	Green	Red	Yellow		Red	Red			Yellow					Yellow											Yellow	Red	Yellow	Red			
04LtCan15	Little Canfield	Green	Green	Yellow								Yellow	Red													Yellow	Red	Yellow	Red			
05LtCan15	Little Canfield	Green	Green	Yellow																						Yellow	Red	Yellow	Red			
06LtCan15 (G&T)	Little Canfield	Green	Green	Yellow																						Yellow	Red	Yellow	Red			
07LtCan15	Little Canfield	Green	Green	Yellow																						Yellow	Red	Yellow	Red			
08LtCan15 (E)	Little Canfield	Green	Red	Yellow				Yellow				Red					Red									Yellow	Red	Yellow	Red			
09LtCan15 (E)	Little Canfield	Green	Red	Yellow		Yellow	Red					Red					Red									Yellow	Red	Yellow	Red			
10LtCan15 (E)	Little Canfield	Green	Green	Yellow								Red	Red					Yellow	Yellow								Yellow	Red	Yellow	Red	Red	
11LtCan15	Little Canfield	Green	Green	Yellow								Red	Red				Red	Yellow	Green							Yellow	Red	Yellow	Red	Green		

Site Ref	Parish/ Settlement	Green Belt	Settlement Development Limit	Development Opportunity Area	AQMA	Poor Air Quality Zone	SSSI	SSSI Impact Risk Zone	National Nature Reserve	Ancient Woodland	Local Nature Reserve	Local Wildlife Site	Priority Habitat	Special Verge	Important Woodland	Geological Site	Surface Water Flood Risk	Groundwater Flood Risk	Fluvial Flood Risk	Conservation Area	Registered Park and Garden	Scheduled Monument	Listed Building	Protected Lane	Greenfield/ Brownfield	Agricultural Land Classification	Mineral Safeguarding Area	Countryside Protection Zone	Tree Preservation Order	Protected Open Space	Groundwater Source Protection Zone
01LtChe15 (E)	Little Chesterford	Green	Green	Yellow	Green	Green	Green	Yellow	Green	Red	Green	Red	Red	Green	Red	Green	Red	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Green	Green	Green	Green	Green
01LtChe15 (E)	Little Chesterford	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Red	Green	Red	Red	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Green	Green	Green	Green	Green
01LtChe15_M erge (E)	Little Chesterford	Green	Green	Yellow	Green	Green	Green	Yellow	Green	Red	Green	Red	Red	Green	Red	Green	Red	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Green	Green	Green	Green	Green
02LtChe15	Little Chesterford	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Red	Green	Red	Green	Green	Red	Yellow	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Green	Green	Green	Red
03LtChe15	Little Chesterford	Green	Green	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green
05LtChe15	Little Chesterford	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Green	Green	Green	Green
06LtChe16	Little Chesterford	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Red	Green	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green
03LtChe15	Little Chesterford (Nr Gt Chesterford)	Green	Green	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Yellow	Green	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green
01LtDun15	Little Dunmow	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Red	Red	Green	Green	Green	Red	Yellow	Green	Red	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green
01LtDun15	Little Dunmow	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Red	Red	Green	Green	Green	Red	Yellow	Green	Red	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green
01LtDun15_M erge	Little Dunmow	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Red	Red	Green	Green	Green	Red	Yellow	Green	Red	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green
02LtDun15 (E)	Little Dunmow	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Red	Red	Green	Green	Green	Red	Yellow	Green	Red	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green
02LtDun15 (E)	Little Dunmow	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Red	Red	Green	Green	Green	Red	Yellow	Green	Red	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green

Page 337

Site Ref	Parish/ Settlement	Green Belt	Settlement Development Limit	Development Opportunity Area	AQMA	Poor Air Quality Zone	SSSI	SSSI Impact Risk Zone	National Nature Reserve	Ancient Woodland	Local Nature Reserve	Local Wildlife Site	Priority Habitat	Special Verge	Important Woodland	Geological Site	Surface Water Flood Risk	Groundwater Flood Risk	Fluvial Flood Risk	Conservation Area	Registered Park and Garden	Scheduled Monument	Listed Building	Protected Lane	Greenfield/ Brownfield	Agricultural Land Classification	Mineral Safeguarding Area	Countryside Protection Zone	Tree Preservation Order	Protected Open Space	Groundwater Source Protection Zone		
02LtDun15 (E)	Little Dunmow																																
02LtDun15 (E)	Little Dunmow																																
02LtDun15_M erge (E)	Little Dunmow																																
03LtDun15 (E) (G&T)	Little Dunmow																																
03LtDun15 (E) (G&T)	Little Dunmow																																
03LtDun15 (E) (G&T)	Little Dunmow																																
03LtDun15 (E) (G&T)	Little Dunmow																																
03LtDun15 (E) (G&T)	Little Dunmow																																
03LtDun15_M erge (E) (G&T)	Little Dunmow																																
01LtEas15	Little Easton																																
02LtEas15	Little Easton																																
03LtEas15	Little Easton																																
04LtEas15	Little Easton																																
05LtEas15 (E)	Little Easton																																

Site Ref	Parish/ Settlement	Green Belt	Settlement Development Limit	Development Opportunity Area	AQMA	Poor Air Quality Zone	SSSI	SSSI Impact Risk Zone	National Nature Reserve	Ancient Woodland	Local Nature Reserve	Local Wildlife Site	Priority Habitat	Special Verge	Important Woodland	Geological Site	Surface Water Flood Risk	Groundwater Flood Risk	Fluvial Flood Risk	Conservation Area	Registered Park and Garden	Scheduled Monument	Listed Building	Protected Lane	Greenfield/ Brownfield	Agricultural Land Classification	Mineral Safeguarding Area	Countryside Protection Zone	Tree Preservation Order	Protected Open Space	Groundwater Source Protection Zone
06LtEas15 (E)	Little Easton	Green	Red	Yellow	Green	Red	Yellow	Green	Red	Green	Green	Red	Green	Green	Red	Green	Yellow	Yellow	Red	Red	Green	Green	Red	Yellow	Red	Yellow	Green	Green	Green	Green	Green
01LtHal15	Little Hallingbury	Red	Red	Yellow	Green	Green	Yellow	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green
02LtHal15	Little Hallingbury	Red	Green	Yellow	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green
03LtHal15	Little Hallingbury	Red	Green	Yellow	Green	Red	Yellow	Green	Green	Green	Green	Green	Red	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green
04LtHal15	Little Hallingbury	Red	Red	Yellow	Green	Green	Yellow	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green
05LtWal15	Little Walden	Green	Red	Yellow	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green
02LtWal15	Little Walden	Green	Red	Yellow	Green	Green	Yellow	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Red	Yellow	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Red	Green	Green
03LtWal15	Little Walden	Green	Red	Yellow	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green
01Lit15	Littlebury	Green	Red	Yellow	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Red	Green	Yellow
02Lit17	Littlebury	Green	Green	Yellow	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Green	Yellow	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Yellow
01Man15	Manuden	Green	Red	Yellow	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Green	Red	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green
02Man16	Manuden	Green	Red	Yellow	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Green	Red	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Yellow
03Man16	Manuden	Green	Red	Yellow	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Green	Red	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green
01New15	Newport	Green	Red	Yellow	Green	Green	Yellow	Green	Green	Green	Green	Red	Red	Green	Yellow	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green
02New15	Newport	Green	Green	Yellow	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green
03New15	Newport	Green	Green	Yellow	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green
04New15	Newport	Green	Red	Yellow	Green	Green	Yellow	Green	Green	Green	Green	Green	Red	Green	Green	Red	Yellow	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Yellow
05New15	Newport	Green	Red	Yellow	Green	Green	Yellow	Green	Green	Green	Green	Yellow	Red	Green	Green	Green	Yellow	Green	Yellow	Red	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green
06New15	Newport	Green	Green	Yellow	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Green	Green	Red	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Yellow
07New15	Newport	Green	Red	Yellow	Green	Green	Yellow	Green	Green	Green	Green	Red	Red	Green	Green	Red	Yellow	Green	Red	Red	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green
08New15	Newport	Green	Red	Yellow	Green	Green	Yellow	Green	Green	Green	Green	Yellow	Red	Green	Green	Red	Yellow	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Yellow

Site Ref	Parish/ Settlement	Green Belt	Settlement Development Limit	Development Opportunity Area	AQMA	Poor Air Quality Zone	SSSI	SSSI Impact Risk Zone	National Nature Reserve	Ancient Woodland	Local Nature Reserve	Local Wildlife Site	Priority Habitat	Special Verge	Important Woodland	Geological Site	Surface Water Flood Risk	Groundwater Flood Risk	Fluvial Flood Risk	Conservation Area	Registered Park and Garden	Scheduled Monument	Listed Building	Protected Lane	Greenfield/ Brownfield	Agricultural Land Classification	Mineral Safeguarding Area	Countryside Protection Zone	Tree Preservation Order	Protected Open Space	Groundwater Source Protection Zone
09New15	Newport																														
10New15	Newport																														
11New15	Newport																														
12New15	Newport																														
13New15 (E)	Newport																														
01Que15	Quendon and Rickling																														
02Que15	Quendon and Rickling																														
03Que15	Quendon and Rickling																														
04Que15	Quendon and Rickling																														
05Que15	Quendon and Rickling																														
06Que15	Quendon and Rickling																														
07Que17	Quendon and Rickling																														
08Que17	Quendon and Rickling																														
01Rad15	Radwinter																														
02Rad15	Radwinter																														

Page 340

Site Ref	Parish/ Settlement	Green Belt	Settlement Development Limit	Development Opportunity Area	AQMA	Poor Air Quality Zone	SSSI	SSSI Impact Risk Zone	National Nature Reserve	Ancient Woodland	Local Nature Reserve	Local Wildlife Site	Priority Habitat	Special Verge	Important Woodland	Geological Site	Surface Water Flood Risk	Groundwater Flood Risk	Fluvial Flood Risk	Conservation Area	Registered Park and Garden	Scheduled Monument	Listed Building	Protected Lane	Greenfield/ Brownfield	Agricultural Land Classification	Mineral Safeguarding Area	Countryside Protection Zone	Tree Preservation Order	Protected Open Space	Groundwater Source Protection Zone	
01Saf15	Saffron Walden																															
02Saf15	Saffron Walden																															
03Saf15	Saffron Walden																															
04Saf15	Saffron Walden																															
05Saf15	Saffron Walden																															
06Saf15	Saffron Walden																															
07Saf15	Saffron Walden																															
08Saf15	Saffron Walden																															
09Saf15	Saffron Walden																															
10Saf15	Saffron Walden																															
11Saf15	Saffron Walden																															
12Saf15	Saffron Walden																															
13Saf15	Saffron Walden																															
14Saf15	Saffron Walden																															
15Saf15	Saffron Walden																															
16Saf16	Saffron Walden																															
17Saf16 (E)	Saffron Walden																															
18Saf16	Saffron Walden																															
19Saf16	Saffron Walden																															
20Saf17 (E)	Saffron Walden																															
01Sew15	Sewards End																															

13008

Site Ref	Parish/ Settlement	Green Belt	Settlement Development Limit	Development Opportunity Area	AQMA	Poor Air Quality Zone	SSSI	SSSI Impact Risk Zone	National Nature Reserve	Ancient Woodland	Local Nature Reserve	Local Wildlife Site	Priority Habitat	Special Verge	Important Woodland	Geological Site	Surface Water Flood Risk	Groundwater Flood Risk	Fluvial Flood Risk	Conservation Area	Registered Park and Garden	Scheduled Monument	Listed Building	Protected Lane	Greenfield/ Brownfield	Agricultural Land Classification	Mineral Safeguarding Area	Countryside Protection Zone	Tree Preservation Order	Protected Open Space	Groundwater Source Protection Zone		
02Sew15	Sewards End																																
03Sew15	Sewards End																																
04Sew15	Sewards End																																
05Sew15	Sewards End																																
06Sew15	Sewards End																																
07Sew15	Sewards End																																
01Sta15	Stansted																																
02Sta15	Stansted																																
03Sta15 (E)	Stansted																																
04Sta15 (E)	Stansted																																
05Sta15 (E)	Stansted																																
05Sta15 (E)	Stansted																																
05Sta15_Merge (E)	Stansted																																
06Sta15	Stansted																																
07Sta15	Stansted																																
08Sta15	Stansted																																
09Sta15	Stansted																																
10Sta15	Stansted																																
11Sta15	Stansted																																
12Sta15	Stansted																																

Site Ref	Parish/ Settlement	Green Belt	Settlement Development Limit	Development Opportunity Area	AQMA	Poor Air Quality Zone	SSSI	SSSI Impact Risk Zone	National Nature Reserve	Ancient Woodland	Local Nature Reserve	Local Wildlife Site	Priority Habitat	Special Verge	Important Woodland	Geological Site	Surface Water Flood Risk	Groundwater Flood Risk	Fluvial Flood Risk	Conservation Area	Registered Park and Garden	Scheduled Monument	Listed Building	Protected Lane	Greenfield/ Brownfield	Agricultural Land Classification	Mineral Safeguarding Area	Countryside Protection Zone	Tree Preservation Order	Protected Open Space	Groundwater Source Protection Zone
13Sta15	Stansted	Red	Green	Yellow				Yellow				Green	Red	Green	Red		Yellow	Green	Red			Red	Red	Green	Red	Yellow	Green	Green	Green	Red	
14Sta15	Stansted	Green	Red	Yellow				Yellow				Green	Red	Green	Yellow		Red	Green	Yellow	Red			Green	Green	Green	Red	Yellow	Green	Green	Green	Red
15Sta15 (E)	Stansted	Green	Green	Yellow				Yellow				Green	Red	Green	Red		Red	Green	Yellow				Red	Green	Green	Red	Yellow	Green	Green	Green	Red
16Sta15 (E)	Stansted	Green	Green	Yellow				Yellow				Green	Red	Green	Red		Red	Green	Yellow					Green	Green	Red	Yellow	Green	Green	Green	Red
17Sta15	Stansted	Green	Red	Yellow				Yellow				Green	Red	Green	Red		Red	Green	Yellow					Green	Green	Red	Yellow	Green	Green	Green	Red
18Sta15	Stansted	Green	Red	Yellow			Yellow	Yellow				Green	Red	Green	Red		Red	Green	Yellow					Green	Green	Red	Yellow	Green	Green	Green	Yellow
19Sta15	Stansted	Green	Green	Yellow				Yellow				Green	Red	Green	Red		Red	Green	Yellow					Green	Green	Red	Yellow	Green	Green	Green	Red
20Sta15	Stansted	Red	Green	Yellow				Yellow				Green	Red	Green	Red		Red	Green	Yellow					Green	Green	Red	Yellow	Green	Green	Green	Red
21Sta15 (E) (G&T)	Stansted	Green	Red	Yellow				Yellow				Green	Red	Green	Red		Red	Green	Yellow					Green	Green	Red	Yellow	Green	Green	Green	Yellow
22Sta15	Stansted	Green	Red	Yellow		Yellow		Yellow				Green	Red	Green	Red		Red	Green	Yellow					Green	Green	Red	Yellow	Green	Green	Green	Red
23Sta15	Stansted	Green	Green	Yellow			Yellow	Yellow				Green	Red	Green	Red		Red	Green	Yellow					Green	Green	Red	Yellow	Green	Green	Green	Yellow
24Sta16	Stansted	Green	Red	Yellow				Yellow				Green	Red	Green	Red		Red	Green	Yellow					Green	Green	Red	Yellow	Green	Green	Green	Red
25Sta16 (E)	Stansted	Green	Green	Yellow				Yellow				Green	Red	Green	Red		Red	Green	Yellow				Red	Green	Green	Red	Yellow	Green	Green	Green	Red
26Sta16	Stansted	Green	Green	Yellow				Yellow				Green	Red	Green	Red		Red	Green	Yellow					Green	Green	Red	Yellow	Green	Green	Green	Red
27Sta17	Stansted Mounfitchet	Red	Red	Yellow				Yellow				Green	Red	Green	Red		Red	Green	Yellow					Green	Green	Red	Yellow	Green	Green	Green	Red
28Sta17	Stansted Mounfitchet	Green	Red	Yellow		Yellow		Yellow				Green	Red	Green	Red		Red	Green	Yellow					Green	Green	Red	Yellow	Green	Green	Green	Red
01Ste15	Stebbing	Green	Green	Yellow				Yellow				Green	Red	Green	Red		Red	Green	Yellow		Red			Green	Green	Red	Yellow	Green	Green	Green	Red
02Ste15	Stebbing	Green	Green	Yellow				Yellow				Green	Red	Green	Red		Red	Green	Yellow					Green	Green	Red	Yellow	Green	Green	Green	Red
03Ste15	Stebbing	Green	Green	Yellow				Yellow				Green	Red	Green	Red		Red	Green	Yellow					Green	Green	Red	Yellow	Green	Green	Green	Red

Site Ref	Parish/ Settlement	Green Belt	Settlement Development Limit	Development Opportunity Area	AQMA	Poor Air Quality Zone	SSSI	SSSI Impact Risk Zone	National Nature Reserve	Ancient Woodland	Local Nature Reserve	Local Wildlife Site	Priority Habitat	Special Verge	Important Woodland	Geological Site	Surface Water Flood Risk	Groundwater Flood Risk	Fluvial Flood Risk	Conservation Area	Registered Park and Garden	Scheduled Monument	Listed Building	Protected Lane	Greenfield/ Brownfield	Agricultural Land Classification	Mineral Safeguarding Area	Countryside Protection Zone	Tree Preservation Order	Protected Open Space	Groundwater Source Protection Zone		
04Ste15	Stebbing																																
05Ste15 (E) (G&T)	Stebbing																																
06Ste15 (E)	Stebbing																																
06Ste15 (E)	Stebbing																																
06Ste15 (E)	Stebbing																																
06Ste15_Merg (E)	Stebbing																																
07Ste16	Stebbing																																
08Ste16	Stebbing																																
09Ste16	Stebbing																																
10Ste16	Stebbing																																
11Ste16	Stebbing																																
01Tak15	Takeley																																
02Tak15	Takeley																																
03Tak15	Takeley																																
04Tak15	Takeley																																
05Tak15	Takeley																																
06Tak15	Takeley																																
07Tak15	Takeley																																
08Tak15 (E)	Takeley																																
09Tak15 (E)	Takeley																																

Site Ref	Parish/ Settlement	Green Belt	Settlement Development Limit	Development Opportunity Area	AQMA	Poor Air Quality Zone	SSSI	SSSI Impact Risk Zone	National Nature Reserve	Ancient Woodland	Local Nature Reserve	Local Wildlife Site	Priority Habitat	Special Verge	Important Woodland	Geological Site	Surface Water Flood Risk	Groundwater Flood Risk	Fluvial Flood Risk	Conservation Area	Registered Park and Garden	Scheduled Monument	Listed Building	Protected Lane	Greenfield/ Brownfield	Agricultural Land Classification	Mineral Safeguarding Area	Countryside Protection Zone	Tree Preservation Order	Protected Open Space	Groundwater Source Protection Zone
10Tak15 (E)	Takeley	Green	Green	Yellow	Green	Red	Green	Yellow	Green	Green	Green	Green	Red	Green	Yellow	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Yellow	Red	Yellow	Red	Green	Green	
11Tak15 (E)	Takeley	Green	Green	Yellow	Green	Red	Green	Yellow	Green	Red	Green	Red	Red	Green	Yellow	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Red	Yellow	Red	Yellow	Red	Green	Green	
12Tak15	Takeley	Green	Green	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Green	Green	Green	Green	
13Tak15 (E)	Takeley	Green	Green	Yellow	Green	Green	Green	Yellow	Green	Red	Green	Red	Red	Green	Yellow	Green	Red	Green	Yellow	Green	Green	Green	Green	Green	Yellow	Red	Red	Green	Green	Green	
14Tak15 (E)	Takeley	Green	Red	Yellow	Green	Red	Green	Yellow	Green	Green	Green	Green	Red	Green	Yellow	Green	Red	Green	Green	Green	Green	Yellow	Green	Red	Yellow	Red	Red	Green	Green	Green	
14Tak15 (E)	Takeley	Green	Red	Yellow	Green	Red	Green	Yellow	Green	Green	Green	Green	Red	Green	Yellow	Green	Red	Green	Green	Green	Green	Yellow	Green	Green	Yellow	Red	Red	Green	Green	Green	
14Tak15 (E)	Takeley	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Red	Red	Green	Yellow	Green	Red	Green	Green	Green	Green	Red	Green	Red	Yellow	Red	Red	Green	Green	Green	
14Tak15 (E)	Takeley	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Red	Green	Yellow	Green	Red	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Red	Green	Green	Green	
14Tak15 (E)	Takeley	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Red	Green	Yellow	Green	Red	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Red	Green	Green	Green	
14Tak15 (E)	Takeley	Green	Red	Yellow	Green	Red	Green	Yellow	Green	Green	Green	Green	Red	Green	Yellow	Green	Red	Green	Green	Green	Green	Red	Green	Red	Yellow	Red	Red	Green	Green	Green	
14Tak15_Merge (E)	Takeley	Green	Red	Yellow	Green	Red	Green	Yellow	Green	Green	Green	Green	Red	Green	Yellow	Green	Red	Green	Green	Green	Green	Red	Green	Red	Yellow	Red	Red	Green	Green	Green	
15Tak15	Takeley	Green	Green	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Red	Green	Green	Green	Red	Green	Yellow	Green	Green	Green	Green	Green	Yellow	Red	Green	Green	Green	Green	
16Tak15	Takeley	Green	Green	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Red	Green	Green	Green	Red	Green	Yellow	Green	Green	Green	Green	Green	Yellow	Red	Green	Green	Green	Green	
17Tak15	Takeley	Green	Green	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Red	Green	Green	Green	Red	Green	Yellow	Green	Green	Green	Green	Green	Yellow	Red	Green	Green	Green	Green	
18Tak16 (E)	Takeley	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Green	Green	Green	Green	Green	Yellow	Red	Green	Green	Green	Green	
19Tak16 (E)	Takeley	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Green	Green	Green	Green	Green	Yellow	Red	Green	Green	Green	Green	
20Tak16 (E)	Takeley	Green	Green	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Red	Red	Green	Green	Green	Red	Green	Yellow	Green	Green	Green	Green	Green	Yellow	Red	Green	Green	Green	Green	
21Tak16 (E)	Takeley	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Green	Green	Green	Green	Green	Yellow	Red	Green	Green	Green	Green	
22Tak17	Takeley	Green	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Red	Red	Green	Yellow	Green	Red	Green	Yellow	Green	Green	Green	Green	Green	Yellow	Red	Green	Green	Green	Green	

Page 345

Site Ref	Parish/ Settlement	Green Belt	Settlement Development Limit	Development Opportunity Area	AQMA	Poor Air Quality Zone	SSSI	SSSI Impact Risk Zone	National Nature Reserve	Ancient Woodland	Local Nature Reserve	Local Wildlife Site	Priority Habitat	Special Verge	Important Woodland	Geological Site	Surface Water Flood Risk	Groundwater Flood Risk	Fluvial Flood Risk	Conservation Area	Registered Park and Garden	Scheduled Monument	Listed Building	Protected Lane	Greenfield/ Brownfield	Agricultural Land Classification	Mineral Safeguarding Area	Countryside Protection Zone	Tree Preservation Order	Protected Open Space	Groundwater Source Protection Zone	
23Tak17	Takeley																															
01Tha15	Thaxted																															
02Tha15	Thaxted																															
03Tha15	Thaxted																															
04Tha15	Thaxted																															
05Tha15	Thaxted																															
06Tha15	Thaxted																															
07Tha15	Thaxted																															
08Tha15	Thaxted																															
09Tha15	Thaxted																															
10Tha15	Thaxted																															
11Tha15	Thaxted																															
12Tha15	Thaxted																															
13Tha15	Thaxted																															
14Tha15	Thaxted																															
15Tha15	Thaxted																															
16Tha15	Thaxted																															
17Tha15	Thaxted																															
18Tha15	Thaxted																															
19Tha15	Thaxted																															
20Tha15	Thaxted																															

Page 346 of 346

Site Ref	Parish/ Settlement	Green Belt	Settlement Development Limit	Development Opportunity Area	AQMA	Poor Air Quality Zone	SSSI	SSSI Impact Risk Zone	National Nature Reserve	Ancient Woodland	Local Nature Reserve	Local Wildlife Site	Priority Habitat	Special Verge	Important Woodland	Geological Site	Surface Water Flood Risk	Groundwater Flood Risk	Fluvial Flood Risk	Conservation Area	Registered Park and Garden	Scheduled Monument	Listed Building	Protected Lane	Greenfield/ Brownfield	Agricultural Land Classification	Mineral Safeguarding Area	Countryside Protection Zone	Tree Preservation Order	Protected Open Space	Groundwater Source Protection Zone
(G&T)																															
01Ug15	Ugley																														
02Ug15	Ugley																														
03Ug15	Ugley																														
04Ug15	Ugley																														
05Ug15	Ugley																														
01Wen15	Wendens Ambo																														
02Wen15 (E)	Wendens Ambo																														
01WRod15	White Roding																														
01Wic15	Wicken Bonhunt																														
02Wic15	Wicken Bonhunt																														
03Wic17	Wicken Bonhunt																														
01Wid15	Widdington																														
02Wid15	Widdington																														
01Wim15	Wimbish																														
02Wim15	Wimbish																														
03Wim15	Wimbish																														
04Wim15	Wimbish																														

73308

Table IVD: Site options appraisal findings

Site Ref	Parish/ Settlement	Stansted Airport Public Safety Zone	Noise Contours	Loss of Designated Employment Site	Existing Employment Area	Town or Local Centre	Retail Centre	Primary School	Secondary School	Hospital / Surgery / Community Hospital	Open / Green Space	Loss of Open / Green Space	Cycle Route	Sports Facility / Pitch	Public Right of Way	Development in Area of Relative Deprivation
01Ark15	Arkesden	Green	Green	Green	Red	Red	Red	Yellow	Red	Yellow	Yellow	Green	Green	Green	Green	Red
02Ark17	Arkesden	Green	Green	Green	Red	Red	Red	Red	Green	Red	Red	Green	Green	Green	Yellow	Red
01Ash15	Ashdon	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Red
02Ash15	Ashdon	Green	Green	Green	Green	Red	Red	Red	Red	Red	Yellow	Green	Yellow	Yellow	Yellow	Red
01Bar15	Barnston	Green	Green	Green	Red	Red	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Green	Red
02Bar15 (E)	Barnston	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Red	Green	Yellow	Red	Green	Red
03Bir15	Birchanger	Green	Green	Green	Red	Red	Red	Green	Red	Red	Yellow	Green	Yellow	Green	Green	Red
02Bir15	Birchanger	Green	Green	Red	Red	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Yellow	Green	Red
03Bir15	Birchanger	Green	Green	Red	Yellow	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Yellow	Red
04Bir15	Birchanger	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Green	Red	Yellow	Red
05Bir15	Birchanger	Green	Yellow	Red	Red	Red	Red	Red	Red	Red	Red	Red	Green	Red	Green	Green
06Bir15 (E)	Birchanger	Green	Green	Green	Yellow	Red	Red	Red	Yellow	Red	Red	Red	Yellow	Green	Green	Red
07Bir16 (E)	Birchanger	Green	Yellow	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Yellow	Green	Red
08Bir16 (E)	Birchanger	Green	Green	Red	Red	Red	Red	Yellow	Yellow	Red	Red	Green	Yellow	Red	Yellow	Red
09Bir16	Birchanger	Green	Green	Green	Green	Red	Red	Red	Yellow	Red	Yellow	Red	Green	Red	Yellow	Green
10Bir17	Birchanger	Green	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Yellow	Red
01Chr15	Chrishall	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Green	Green	Red
01Cla15	Clavering	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Red
02Cla15	Clavering	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Yellow	Red
03Cla15	Clavering	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Green	Yellow	Yellow	Red

01
02
03
04
05
06
07
08
09
10

Site Ref	Parish/ Settlement	Stansted Airport Public Safety Zone	Noise Contours	Loss of Designated Employment Site	Existing Employment Area	Town or Local Centre	Retail Centre	Primary School	Secondary School	Hospital / Surgery / Community Hospital	Open / Green Space	Loss of Open / Green Space	Cycle Route	Sports Facility / Pitch	Public Right of Way	Development in Area of Relative Deprivation
04Cla15	Clavering	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Green	Red	Yellow	Red
05Cla15	Clavering	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Green	Red	Yellow	Red
06Cla15	Clavering	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Yellow	Green	Red
07Cla15	Clavering	Green	Green	Green	Red	Red	Red	Red	Red	Red	Yellow	Green	Green	Red	Yellow	Red
08Cla15	Clavering	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Green	Red	Green	Red
09Cla15	Clavering	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Green	Red	Green	Red
10Cla15	Clavering	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Red	Green	Yellow	Red	Green	Red
11Cla15	Clavering	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Red
12Cla15	Clavering	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Red	Green	Red
13Cla15	Clavering	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Red	Green	Yellow	Red	Yellow	Red
14Cla15	Clavering	Green	Green	Green	Red	Red	Red	Yellow	Red	Green	Red	Green	Yellow	Red	Yellow	Red
15Cla15 (E)	Clavering	Green	Green	Green	Red	Red	Red	Red	Red	Red	Yellow	Green	Yellow	Red	Yellow	Red
16Cla15	Clavering	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Yellow	Red
17Cla15	Clavering	Green	Green	Green	Red	Red	Red	Green	Red	Red	Yellow	Green	Yellow	Yellow	Green	Red
18Cla15	Clavering	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Yellow	Red
19Cla15	Clavering	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Green	Red	Green	Red
20Cla15	Clavering	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Green	Red	Green	Red
21Cla15	Clavering	Green	Green	Green	Red	Red	Red	Green	Red	Red	Yellow	Green	Green	Red	Green	Red
22Cla15	Clavering	Green	Green	Green	Red	Red	Red	Green	Yellow	Red	Yellow	Green	Yellow	Red	Green	Red
23Cla15	Clavering	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Yellow	Green	Yellow	Red	Yellow	Red
01Deb15 (E)	Debden	Green	Green	Green	Red	Red	Red	Yellow	Yellow	Red	Red	Green	Yellow	Red	Green	Red

673089

Site Ref	Parish/ Settlement	Stansted Airport Public Safety Zone	Noise Contours	Loss of Designated Employment Site	Existing Employment Area	Town or Local Centre	Retail Centre	Primary School	Secondary School	Hospital / Surgery / Community Hospital	Open / Green Space	Loss of Open / Green Space	Cycle Route	Sports Facility / Pitch	Public Right of Way	Development in Area of Relative Deprivation
(G&T)		Green	Green	Green	Red	Red	Red	Yellow	Yellow	Red	Red	Green	Yellow	Red	Green	Red
02Deb15	Debden	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Red
03Deb15	Debden	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Red
04Deb15	Debden	Green	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Green	Red
05Deb15 (E)	Debden	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Red	Green	Yellow	Red	Yellow	Red
01Elm15	Elmdon	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Green	Red
04Els15 (E)	Elsenham	Green	Yellow	Red	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Green	Yellow	Red
02Els15	Elsenham	Green	Green	Green	Green	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Red	Yellow	Yellow	Green	Red
03Els15	Elsenham	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Red
04Els15	Elsenham	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Yellow	Red
05Els15 (E)	Elsenham	Green	Green	Green	Yellow	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Yellow	Red
06Els15 (E)	Elsenham	Green	Green	Green	Red	Green	Green	Red	Red	Red	Red	Green	Yellow	Yellow	Green	Red
06Els15 (E)	Elsenham	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Red	Red	Yellow	Green	Green	Red
06Els15_Merge (E)	Elsenham	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Yellow	Red	Green	Red
07Els15 (E)	Elsenham	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Red	Green	Yellow	Red	Yellow	Red
07Els15 (E)	Elsenham	Green	Green	Red	Red	Yellow	Yellow	Red	Red	Green	Red	Red	Yellow	Red	Yellow	Red
07Els15_Merge (E)	Elsenham	Green	Green	Red	Red	Red	Red	Red	Red	Red	Yellow	Red	Yellow	Red	Green	Red
08Els15	Elsenham	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Yellow	Red
09Els15	Elsenham	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Red	Green	Yellow	Red	Yellow	Red
10Els16 (E)	Elsenham	Green	Yellow	Green	Red	Red	Red	Yellow	Red	Red	Red	Green	Yellow	Green	Green	Red

Page 332 of 332

Site Ref	Parish/ Settlement	Stansted Airport Public Safety Zone	Noise Contours	Loss of Designated Employment Site	Existing Employment Area	Town or Local Centre	Retail Centre	Primary School	Secondary School	Hospital / Surgery / Community Hospital	Open / Green Space	Loss of Open / Green Space	Cycle Route	Sports Facility / Pitch	Public Right of Way	Development in Area of Relative Deprivation
18Fel15	Felsted	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Red	Green	Yellow	Yellow	Yellow	Red
19Fel15	Felsted	Green	Green	Green	Red	Red	Red	Red	Green	Red	Red	Green	Yellow	Green	Green	Red
20Fel15	Felsted	Green	Green	Green	Red	Yellow	Yellow	Green	Red	Red	Yellow	Green	Yellow	Green	Green	Red
21Fel15 (E)	Felsted	Green	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Green	Yellow	Yellow	Green	Red
22Fel15 (E)	Felsted	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Red
23Fel15	Felsted	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Red
24Fel15	Felsted	Green	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Green	Yellow	Red	Green	Red
25Fel15	Felsted	Green	Green	Green	Red	Red	Red	Red	Red	Yellow	Red	Green	Yellow	Yellow	Yellow	Red
26Fel15	Felsted	Green	Green	Green	Green	Red	Red	Green	Yellow	Red	Red	Green	Yellow	Yellow	Green	Red
27Fel15	Felsted	Green	Green	Green	Red	Green	Green	Red	Red	Yellow	Red	Green	Yellow	Green	Green	Red
28Fel15	Felsted	Green	Green	Green	Yellow	Red	Red	Yellow	Red	Red	Red	Green	Yellow	Yellow	Green	Red
29Fel16 (G&T)	Felsted	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Red
30Fel16	Felsted	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Red
02Fel15	Felsted (Bartholomew Green)	Green	Green	Green	Yellow	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Yellow	Red
07GtCan17	Great Canfield	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Yellow	Red	Yellow	Yellow
01GtCan15 (G&T)	Gt Canfield	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Yellow
02GtCan15	Gt Canfield	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Yellow	Yellow
03GtCan15	Gt Canfield	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Yellow	Yellow	Yellow
04GtCan15	Gt Canfield	Green	Green	Green	Green	Red	Red	Red	Yellow	Green	Red	Green	Green	Green	Yellow	Yellow
05GtCan15	Gt Canfield	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Green	Yellow	Yellow	Green	Yellow

01GtCan15
 02GtCan15
 03GtCan15
 04GtCan15
 05GtCan15

Site Ref	Parish/ Settlement	Stansted Airport Public Safety Zone	Noise Contours	Loss of Designated Employment Site	Existing Employment Area	Town or Local Centre	Retail Centre	Primary School	Secondary School	Hospital / Surgery / Community Hospital	Open / Green Space	Loss of Open / Green Space	Cycle Route	Sports Facility / Pitch	Public Right of Way	Development in Area of Relative Deprivation
06GtCan17	Gt Canfield	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Yellow	Green	Green	Green	Green	Yellow
01GtChe15	Gt Chesterford	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Red	Green	Red
02GtChe15	Gt Chesterford	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Yellow	Green	Yellow	Green	Green	Red
03GtChe15	Gt Chesterford	Green	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Yellow	Red
04GtChe15	Gt Chesterford	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Red
05GtChe15	Gt Chesterford	Green	Green	Green	Red	Green	Green	Red	Red	Yellow	Red	Green	Yellow	Yellow	Yellow	Red
06GtChe15	Gt Chesterford	Green	Green	Green	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Red	Red	Yellow	Yellow	Yellow	Red
07GtChe15	Gt Chesterford	Green	Green	Green	Green	Red	Red	Yellow	Red	Red	Red	Green	Yellow	Red	Green	Red
08GtChe15 (E)	Gt Chesterford	Green	Green	Green	Green	Red	Red	Green	Red	Yellow	Red	Green	Yellow	Green	Green	Red
09GtChe15	Gt Chesterford	Green	Green	Green	Yellow	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Green	Green	Red
10GtChe15 (E)	Gt Chesterford	Green	Green	Green	Green	Red	Red	Green	Red	Green	Yellow	Green	Yellow	Green	Yellow	Red
02GtChe15	Gt Chesterford zone 2	Green	Green	Green	Red	Red	Red	Red	Red	Yellow	Red	Green	Yellow	Red	Green	Red
02GtChe15	Gt Chesterford zone 4	Green	Green	Green	Red	Red	Red	Red	Red	Red	Yellow	Green	Yellow	Red	Green	Red
02GtChe15	Gt Chesterford zones 3	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Red
02GtChe15_Merge	Gt Chesterford zones 3	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Red
01GtDun15	Gt Dunmow	Green	Green	Green	Red	Red	Red	Red	Red	Red	Yellow	Green	Green	Yellow	Yellow	Red
02GtDun15	Gt Dunmow	Green	Green	Green	Red	Red	Red	Green	Red	Red	Red	Green	Yellow	Red	Green	Yellow
03GtDun15 (E)	Gt Dunmow	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Green	Red	Yellow	Red

335

Site Ref	Parish/ Settlement	Stansted Airport Public Safety Zone	Noise Contours	Loss of Designated Employment Site	Existing Employment Area	Town or Local Centre	Retail Centre	Primary School	Secondary School	Hospital / Surgery / Community Hospital	Open / Green Space	Loss of Open / Green Space	Cycle Route	Sports Facility / Pitch	Public Right of Way	Development in Area of Relative Deprivation
01GtHal15	Gt Hallingbury	Green	Yellow	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Green	Yellow	Red
02GtHal15	Gt Hallingbury	Green	Red	Green	Green	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Red
03GtHal15	Gt Hallingbury	Green	Green	Green	Red	Red	Red	Green	Red	Red	Yellow	Green	Yellow	Red	Green	Red
04GtHal15 (E)	Gt Hallingbury	Green	Red	Red	Red	Red	Red	Yellow	Red	Yellow	Red	Green	Yellow	Yellow	Green	Green
05GtHal15 (E)	Gt Hallingbury	Green	Yellow	Green	Red	Red	Red	Red	Red	Red	Red	Green	Green	Red	Green	Red
06GtHal16	Gt Hallingbury	Green	Yellow	Green	Red	Red	Red	Red	Red	Red	Yellow	Green	Yellow	Red	Green	Red
07GtHal16 (E)	Gt Hallingbury	Green	Red	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Red
08GtHal16 (E)	Gt Hallingbury	Green	Red	Red	Green	Yellow	Red	Yellow	Yellow	Red	Yellow	Green	Yellow	Yellow	Green	Green
09GtHal16 (E)	Gt Hallingbury	Green	Red	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Green	Red	Green	Green
01GtSam15	Gt Sampford	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Red
02GtSam15	Gt Sampford	Green	Green	Green	Yellow	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Yellow	Red
01Had15	Hadstock	Green	Green	Green	Red	Yellow	Red	Red	Red	Red	Red	Red	Yellow	Red	Green	Red
01HBO15 (E)	Hatfield Broad Oak	Green	Green	Green	Red	Red	Red	Green	Red	Red	Yellow	Green	Yellow	Yellow	Yellow	Red
02HBO15	Hatfield Broad Oak	Green	Green	Green	Red	Green	Green	Yellow	Yellow	Yellow	Yellow	Red	Green	Green	Green	Yellow
05HBO15	Hatfield Broad Oak	Green	Green	Green	Yellow	Red	Red	Green	Green	Green	Red	Green	Yellow	Green	Green	Red
06HBO15	Hatfield Broad Oak	Green	Green	Green	Yellow	Red	Red	Yellow	Red	Yellow	Red	Green	Yellow	Green	Green	Red
07HBO15	Hatfield Broad Oak	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Red	Green	Red

337

Site Ref	Parish/ Settlement	Stansted Airport Public Safety Zone	Noise Contours	Loss of Designated Employment Site	Existing Employment Area	Town or Local Centre	Retail Centre	Primary School	Secondary School	Hospital / Surgery / Community Hospital	Open / Green Space	Loss of Open / Green Space	Cycle Route	Sports Facility / Pitch	Public Right of Way	Development in Area of Relative Deprivation
08HBO17	Hatfield Broad Oak	Green	Green	Green	Yellow	Red	Red	Yellow	Red	Yellow	Yellow	Green	Yellow	Green	Yellow	Red
03HBO15	Hatfield Broad Oak (Takeley)	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Green	Red	Yellow	Yellow
04HBO15	Hatfield Broad Oak (Takeley)	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Green	Red	Green	Green
01HHea15	Hatfield Heath	Green	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Red	Yellow	Red	Green	Red
02HHea15	Hatfield Heath	Green	Green	Green	Red	Red	Red	Red	Red	Red	Yellow	Green	Yellow	Green	Green	Red
03HHea15 (E)	Hatfield Heath	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Yellow	Red
04HHea15 (E)	Hatfield Heath	Green	Green	Green	Red	Red	Red	Green	Red	Red	Red	Green	Yellow	Green	Green	Red
05HHea15	Hatfield Heath	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Green	Red
06HHea15	Hatfield Heath	Green	Green	Green	Red	Green	Red	Green	Red	Yellow	Red	Green	Yellow	Green	Green	Red
07HHea15	Hatfield Heath	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Yellow	Red
08HHea17	Hatfield Heath	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Yellow	Red
09HHea17	Hatfield Heath	Green	Green	Green	Red	Red	Red	Yellow	Red	Green	Yellow	Green	Yellow	Green	Yellow	Red
01Hen15	Henham	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Yellow	Red
02Hen15	Henham	Green	Green	Green	Red	Yellow	Yellow	Green	Red	Yellow	Yellow	Green	Yellow	Green	Green	Red
03Hen15	Henham	Green	Green	Green	Yellow	Red	Red	Red	Red	Red	Red	Green	Yellow	Yellow	Green	Red
04Hen15	Henham	Green	Green	Green	Green	Red	Red	Red	Yellow	Yellow	Red	Green	Yellow	Yellow	Yellow	Red
05Hen15	Henham	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Red
06Hen15	Henham	Green	Yellow	Green	Red	Red	Red	Green	Red	Yellow	Yellow	Green	Yellow	Green	Yellow	Green
07Hen16	Henham	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Yellow	Red

Page 355

Site Ref	Parish/ Settlement	Stansted Airport Public Safety Zone	Noise Contours	Loss of Designated Employment Site	Existing Employment Area	Town or Local Centre	Retail Centre	Primary School	Secondary School	Hospital / Surgery / Community Hospital	Open / Green Space	Loss of Open / Green Space	Cycle Route	Sports Facility / Pitch	Public Right of Way	Development in Area of Relative Deprivation
08Hen17	Henham	Green	Green	Green	Yellow	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Yellow	Red
01HEas15	High Easter	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Yellow	Green	Red
02HEas15	High Easter	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Yellow	Yellow	Red
01HRod15	High Roding	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Green	Green	Red
02HRod15	High Roding	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Red	Yellow	Red
03HRod15	High Roding	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Red	Green	Red
04HRod16	High Roding	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Red	Yellow	Red	Green	Red
01Lan15	Langley	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Yellow	Green	Red
02Lan15	Langley	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Red	Green	Red
03Lan15	Langley	Green	Green	Green	Yellow	Yellow	Yellow	Red	Yellow	Red	Yellow	Green	Yellow	Yellow	Green	Red
01LRod15	Leaden Roding	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Red	Yellow	Red
02LRod15	Leaden Roding	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Yellow	Green	Red
03LRod15	Leaden Roding	Green	Green	Green	Red	Green	Green	Red	Yellow	Red	Yellow	Green	Yellow	Green	Green	Red
04LRod15	Leaden Roding	Green	Green	Green	Red	Yellow	Yellow	Red	Yellow	Red	Yellow	Green	Yellow	Green	Green	Red
05LRod15	Leaden Roding	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Red	Green	Red
01Lin15	Lindsell	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Green	Green	Red
02Lin15	Lindsell	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Red	Green	Red
03Lin15	Lindsell	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Green	Yellow	Red
04Lin15	Lindsell	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Red	Green	Red
01LtCan15	Little Canfield	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Green	Yellow	Green
02LtCan15	Little Canfield	Green	Green	Green	Red	Yellow	Yellow	Green	Yellow	Yellow	Red	Green	Green	Yellow	Green	Green

357

Site Ref	Parish/ Settlement	Stansted Airport Public Safety Zone	Noise Contours	Loss of Designated Employment Site	Existing Employment Area	Town or Local Centre	Retail Centre	Primary School	Secondary School	Hospital / Surgery / Community Hospital	Open / Green Space	Loss of Open / Green Space	Cycle Route	Sports Facility / Pitch	Public Right of Way	Development in Area of Relative Deprivation
03LtCan15	Little Canfield	Green	Green	Green	Red	Red	Red	Green	Red	Red	Red	Green	Green	Green	Green	Green
04LtCan15	Little Canfield	Green	Green	Green	Red	Red	Red	Yellow	Red	Green	Red	Green	Green	Yellow	Yellow	Green
05LtCan15	Little Canfield	Green	Green	Green	Red	Red	Red	Red	Red	Red	Yellow	Green	Green	Red	Yellow	Green
06LtCan15 (G&T)	Little Canfield	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Green	Yellow	Green	Green
07LtCan15	Little Canfield	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Green	Red	Yellow	Green
08LtCan15 (E)	Little Canfield	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Green	Red	Green	Green
09LtCan15 (E)	Little Canfield	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Green	Yellow	Yellow	Green
10LtCan15 (E)	Little Canfield	Green	Green	Green	Red	Red	Red	Yellow	Red	Green	Red	Red	Green	Green	Green	Green
11LtCan15	Little Canfield	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Green	Green	Yellow	Green	Green
01LtChe15 (E)	Little Chesterford	Green	Green	Red	Green	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Green	Red
01LtChe15 (E)	Little Chesterford	Green	Green	Green	Green	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Red	Green	Red
01LtChe15_Merge (E)	Little Chesterford	Green	Green	Red	Green	Red	Red	Green	Yellow	Red	Red	Green	Yellow	Green	Green	Red
02LtChe15	Little Chesterford	Green	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Green	Green	Red
04LtChe15	Little Chesterford	Green	Green	Green	Red	Red	Red	Red	Red	Red	Yellow	Green	Yellow	Red	Yellow	Red
05LtChe15	Little Chesterford	Green	Green	Green	Red	Red	Red	Red	Red	Red	Yellow	Green	Yellow	Yellow	Green	Red
06LtChe16	Little Chesterford	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Yellow	Green	Red
03LtChe15 (Nr Gt Chesterford)	Little Chesterford (Nr Gt Chesterford)	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Green	Yellow	Red
01LtDun15	Little Dunmow	Green	Green	Green	Yellow	Red	Red	Red	Yellow	Red	Red	Green	Green	Red	Yellow	Red
01LtDun15	Little Dunmow	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Green	Red	Yellow	Red

03
04
05
06
07
08
09
10
11
01
01
01
02
04
05
06
03
01
01

Site Ref	Parish/ Settlement	Stansted Airport Public Safety Zone	Noise Contours	Loss of Designated Employment Site	Existing Employment Area	Town or Local Centre	Retail Centre	Primary School	Secondary School	Hospital / Surgery / Community Hospital	Open / Green Space	Loss of Open / Green Space	Cycle Route	Sports Facility / Pitch	Public Right of Way	Development in Area of Relative Deprivation
01LtDun15_Merge	Little Dunmow	Green	Green	Green	Green	Red	Red	Red	Red	Red	Yellow	Green	Green	Yellow	Yellow	Red
02LtDun15 (E)	Little Dunmow	Green	Green	Green	Red	Red	Red	Red	Green	Red	Yellow	Green	Green	Green	Yellow	Red
02LtDun15 (E)	Little Dunmow	Green	Green	Green	Yellow	Red	Red	Red	Red	Red	Yellow	Green	Green	Red	Green	Red
02LtDun15 (E)	Little Dunmow	Green	Green	Green	Red	Red	Red	Red	Red	Red	Yellow	Green	Green	Red	Yellow	Red
02LtDun15 (E)	Little Dunmow	Green	Green	Green	Red	Red	Red	Red	Red	Red	Yellow	Green	Green	Green	Yellow	Red
02LtDun15_Merge (E)	Little Dunmow	Green	Green	Green	Red	Red	Red	Red	Green	Yellow	Yellow	Green	Green	Yellow	Green	Red
03LtDun15 (E) (G&T)	Little Dunmow	Green	Green	Green	Red	Red	Red	Yellow	Yellow	Green	Red	Green	Green	Green	Yellow	Red
03LtDun15 (E) (G&T)	Little Dunmow	Green	Green	Green	Yellow	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Red
03LtDun15 (E) (G&T)	Little Dunmow	Green	Green	Green	Red	Red	Red	Red	Green	Red	Red	Green	Yellow	Green	Yellow	Red
03LtDun15 (E) (G&T)	Little Dunmow	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Green	Yellow	Yellow	Red
03LtDun15 (E) (G&T)	Little Dunmow	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Red	Green	Green	Yellow	Yellow	Red
03LtDun15_Merge (E) (G&T)	Little Dunmow	Green	Green	Green	Yellow	Red	Red	Red	Red	Red	Red	Green	Green	Red	Yellow	Red
01LtEas15	Little Easton	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Yellow	Green
02LtEas15	Little Easton	Green	Green	Green	Yellow	Red	Red	Red	Red	Yellow	Green	Green	Yellow	Green	Yellow	Green

01
02
03
04
05
06
07
08
09
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100

Site Ref	Parish/ Settlement	Stansted Airport Public Safety Zone	Noise Contours	Loss of Designated Employment Site	Existing Employment Area	Town or Local Centre	Retail Centre	Primary School	Secondary School	Hospital / Surgery / Community Hospital	Open / Green Space	Loss of Open / Green Space	Cycle Route	Sports Facility / Pitch	Public Right of Way	Development in Area of Relative Deprivation
03LtEas15	Little Easton	Green	Green	Green	Yellow	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Yellow	Green
04LtEas15	Little Easton	Green	Green	Green	Red	Red	Red	Red	Red	Red	Yellow	Green	Yellow	Red	Yellow	Green
05LtEas15 (E)	Little Easton	Green	Green	Green	Yellow	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Yellow	Green
06LtEas15 (E)	Little Easton	Green	Green	Green	Yellow	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Yellow	Green
01LtHal15	Little Hallingbury	Green	Yellow	Green	Green	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Green	Red
02LtHal15	Little Hallingbury	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Green	Red
03LtHal15	Little Hallingbury	Green	Yellow	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Yellow	Red
04LtHal15	Little Hallingbury	Green	Yellow	Green	Red	Red	Red	Red	Yellow	Green	Red	Green	Yellow	Red	Green	Red
01LtWal15	Little Walden	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Green	Red
02LtWal15	Little Walden	Green	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Green	Red
03LtWal15	Little Walden	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Yellow	Red
01Lit15	Littlebury	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Green	Red
02Lit17	Littlebury	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Green	Red
01Man15	Manuden	Green	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Green	Green	Red	Yellow	Red
02Man16	Manuden	Green	Green	Green	Red	Red	Red	Green	Yellow	Red	Red	Green	Yellow	Red	Green	Red
03Man16	Manuden	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Green	Red	Yellow	Red
01New15	Newport	Green	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Yellow	Red
02New15	Newport	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Yellow	Red
03New15	Newport	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Green	Red
04New15	Newport	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Green	Red
05New15	Newport	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Green	Red

Site Ref	Parish/ Settlement	Stansted Airport Public Safety Zone	Noise Contours	Loss of Designated Employment Site	Existing Employment Area	Town or Local Centre	Retail Centre	Primary School	Secondary School	Hospital / Surgery / Community Hospital	Open / Green Space	Loss of Open / Green Space	Cycle Route	Sports Facility / Pitch	Public Right of Way	Development in Area of Relative Deprivation
06New15	Newport	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Yellow	Green	Yellow	Red	Green	Red
07New15	Newport	Green	Green	Green	Green	Red	Red	Yellow	Red	Red	Yellow	Green	Yellow	Yellow	Green	Red
08New15	Newport	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Red
09New15	Newport	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Red
10New15	Newport	Green	Green	Green	Red	Red	Red	Green	Red	Red	Red	Green	Yellow	Red	Green	Red
11New15	Newport	Green	Green	Green	Red	Red	Red	Red	Red	Red	Yellow	Green	Yellow	Red	Green	Red
12New15	Newport	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Yellow	Red
13New15 (E)	Newport	Green	Green	Green	Yellow	Yellow	Yellow	Red	Yellow	Red	Yellow	Green	Yellow	Green	Green	Red
01Que15	Quendon and Rickling	Green	Green	Green	Green	Red	Red	Green	Yellow	Yellow	Red	Green	Yellow	Green	Green	Red
02Que15	Quendon and Rickling	Green	Green	Green	Yellow	Green	Green	Red	Yellow	Green	Yellow	Green	Yellow	Green	Yellow	Red
03Que15	Quendon and Rickling	Green	Green	Green	Green	Red	Red	Red	Yellow	Green	Red	Green	Yellow	Yellow	Yellow	Red
04Que15	Quendon and Rickling	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Yellow	Red	Yellow	Red
05Que15	Quendon and Rickling	Green	Green	Green	Yellow	Red	Red	Red	Red	Red	Yellow	Green	Yellow	Red	Yellow	Red
06Que15	Quendon and Rickling	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Red
07Que17	Quendon and Rickling	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Green	Red	Yellow	Red
08Que17	Quendon and	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Yellow	Red	Yellow	Red

Page 361

Site Ref	Parish/ Settlement	Stansted Airport Public Safety Zone	Noise Contours	Loss of Designated Employment Site	Existing Employment Area	Town or Local Centre	Retail Centre	Primary School	Secondary School	Hospital / Surgery / Community Hospital	Open / Green Space	Loss of Open / Green Space	Cycle Route	Sports Facility / Pitch	Public Right of Way	Development in Area of Relative Deprivation
	Rickling	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Yellow	Red	Yellow	Red
01Rad15	Radwinter	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Red
02Rad15	Radwinter	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Red
01Saf15	Saffron Walden	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Yellow	Red
02Saf15	Saffron Walden	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Yellow	Red
03Saf15	Saffron Walden	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Red
04Saf15	Saffron Walden	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Green	Green	Red	Yellow	Red
05Saf15	Saffron Walden	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Yellow	Red
06Saf15	Saffron Walden	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Red	Red	Yellow	Red	Green	Red
07Saf15	Saffron Walden	Green	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Yellow	Red
08Saf15	Saffron Walden	Green	Green	Green	Red	Red	Red	Red	Red	Red	Yellow	Green	Yellow	Green	Yellow	Red
09Saf15	Saffron Walden	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Yellow	Red
10Saf15	Saffron Walden	Green	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Yellow	Green
11Saf15	Saffron Walden	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Red	Red	Yellow	Red	Yellow	Red
12Saf15	Saffron Walden	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Red
13Saf15	Saffron Walden	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Yellow	Green
14Saf15	Saffron Walden	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Yellow	Red
15Saf15	Saffron Walden	Green	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Red	Yellow	Red	Green	Green
16Saf16	Saffron Walden	Green	Green	Green	Red	Green	Green	Yellow	Red	Green	Yellow	Green	Yellow	Red	Yellow	Red
17Saf16 (E)	Saffron Walden	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Green	Red	Green	Red
18Saf16	Saffron Walden	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Yellow	Green	Yellow	Yellow	Yellow	Red

Page 33

Site Ref	Parish/ Settlement	Stansted Airport Public Safety Zone	Noise Contours	Loss of Designated Employment Site	Existing Employment Area	Town or Local Centre	Retail Centre	Primary School	Secondary School	Hospital / Surgery / Community Hospital	Open / Green Space	Loss of Open / Green Space	Cycle Route	Sports Facility / Pitch	Public Right of Way	Development in Area of Relative Deprivation
10Sta15	Stansted	Green	Green	Green	Yellow	Red	Red	Yellow	Red	Yellow	Yellow	Green	Yellow	Green	Yellow	Red
11Sta15	Stansted	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Green
12Sta15	Stansted	Green	Green	Green	Red	Red	Red	Yellow	Yellow	Red	Red	Green	Green	Yellow	Yellow	Red
13Sta15	Stansted	Green	Green	Green	Yellow	Green	Green	Yellow	Yellow	Yellow	Yellow	Green	Green	Yellow	Yellow	Red
14Sta15	Stansted	Green	Green	Green	Red	Red	Red	Green	Red	Red	Yellow	Green	Yellow	Green	Green	Red
15Sta15 (E)	Stansted	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Red	Green	Yellow	Yellow	Red
16Sta15 (E)	Stansted	Green	Yellow	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Green
17Sta15	Stansted	Green	Green	Green	Yellow	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Yellow	Green	Red
18Sta15	Stansted	Green	Green	Green	Red	Green	Green	Red	Red	Yellow	Yellow	Green	Yellow	Green	Green	Red
19Sta15	Stansted	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Yellow	Red
20Sta15	Stansted	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Red
21Sta15 (E) (G&T)	Stansted	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Green	Green	Red	Green	Red
22Sta15	Stansted	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Yellow	Red
23Sta15	Stansted	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Red	Green	Yellow	Red	Yellow	Red
24Sta16	Stansted	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Yellow	Green	Yellow	Red	Yellow	Red
25Sta16 (E)	Stansted	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Yellow	Green	Yellow	Red	Yellow	Red
26Sta16	Stansted	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Green	Yellow	Green	Red
27Sta17	Stansted Mountfitchet	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Green	Yellow	Yellow	Green
28Sta17	Stansted Mountfitchet	Green	Green	Green	Red	Red	Red	Yellow	Red	Yellow	Red	Green	Yellow	Red	Green	Red
01Ste15	Stebbing	Green	Green	Green	Red	Red	Red	Red	Red	Red	Yellow	Green	Yellow	Red	Green	Red

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Site Ref	Parish/ Settlement	Stansted Airport Public Safety Zone	Noise Contours	Loss of Designated Employment Site	Existing Employment Area	Town or Local Centre	Retail Centre	Primary School	Secondary School	Hospital / Surgery / Community Hospital	Open / Green Space	Loss of Open / Green Space	Cycle Route	Sports Facility / Pitch	Public Right of Way	Development in Area of Relative Deprivation
02Ste15	Stebbing	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Yellow	Green	Yellow	Yellow	Green	Red
03Ste15	Stebbing	Green	Green	Green	Green	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Red	Green	Red
04Ste15	Stebbing	Green	Green	Green	Green	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Green	Yellow	Red
05Ste15 (E) (G&T)	Stebbing	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Yellow	Green	Yellow	Red	Yellow	Red
06Ste15 (E)	Stebbing	Green	Green	Green	Green	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Green	Yellow	Red
07Ste15 (E)	Stebbing	Green	Green	Green	Green	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Green	Yellow	Red
08Ste15 (E)	Stebbing	Green	Green	Green	Green	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Red	Green	Red
06Ste15_Merge	Stebbing	Green	Green	Green	Red	Red	Red	Red	Green	Red	Yellow	Green	Yellow	Red	Green	Red
07Ste16	Stebbing	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Red	Green	Red
08Ste16	Stebbing	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Red	Green	Red
09Ste16	Stebbing	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Red	Green	Red
10Ste16	Stebbing	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Red	Green	Red
11Ste16	Stebbing	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Red	Green	Red
01Tak15	Takeley	Green	Green	Green	Green	Red	Red	Red	Yellow	Red	Yellow	Green	Green	Red	Yellow	Green
02Tak15	Takeley	Green	Yellow	Green	Red	Red	Red	Green	Red	Red	Yellow	Green	Yellow	Red	Yellow	Green
03Tak15	Takeley	Green	Green	Green	Red	Red	Red	Yellow	Red	Green	Yellow	Green	Yellow	Green	Green	Green
04Tak15	Takeley	Green	Green	Green	Red	Red	Red	Red	Red	Red	Yellow	Green	Yellow	Red	Green	Green
05Tak15	Takeley	Green	Green	Green	Green	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Red	Green	Green
06Tak15	Takeley	Green	Green	Green	Yellow	Red	Red	Green	Yellow	Red	Green	Green	Yellow	Red	Green	Green
07Tak15	Takeley	Green	Green	Green	Green	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Red	Yellow	Green

09/05/2024

Site Ref	Parish/ Settlement	Stansted Airport Public Safety Zone	Noise Contours	Loss of Designated Employment Site	Existing Employment Area	Town or Local Centre	Retail Centre	Primary School	Secondary School	Hospital / Surgery / Community Hospital	Open / Green Space	Loss of Open / Green Space	Cycle Route	Sports Facility / Pitch	Public Right of Way	Development in Area of Relative Deprivation
08Tak15 (E)	Takeley	Green	Green	Green	Yellow	Red	Red	Red	Red	Red	Red	Green	Yellow	Green	Yellow	Green
09Tak15 (E)	Takeley	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Yellow	Green	Yellow	Yellow	Green	Green
10Tak15 (E)	Takeley	Green	Green	Green	Green	Yellow	Yellow	Yellow	Yellow	Red	Yellow	Green	Green	Yellow	Yellow	Green
11Tak15 (E)	Takeley	Green	Green	Green	Green	Red	Red	Red	Red	Red	Yellow	Green	Green	Red	Yellow	Green
12Tak15	Takeley	Green	Green	Green	Green	Yellow	Yellow	Yellow	Yellow	Red	Yellow	Red	Yellow	Yellow	Yellow	Green
13Tak15 (E)	Takeley	Green	Yellow	Green	Green	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Yellow	Green
14Tak15 (E)	Takeley	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Yellow	Yellow	Green
14Tak15 (E)	Takeley	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Red	Green	Yellow	Yellow	Yellow	Green
14Tak15 (E)	Takeley	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Yellow	Yellow	Green
14Tak15 (E)	Takeley	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Yellow	Yellow	Green
14Tak15 (E)	Takeley	Green	Yellow	Green	Yellow	Red	Red	Yellow	Red	Red	Yellow	Green	Yellow	Yellow	Yellow	Green
14Tak15 (E)	Takeley	Green	Green	Green	Red	Red	Red	Red	Red	Red	Yellow	Green	Yellow	Green	Yellow	Green
14Tak15_Merge (E)	Takeley	Green	Yellow	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Red	Yellow	Green
15Tak15	Takeley	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Red	Yellow	Green
16Tak15	Takeley	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Yellow	Green
17Tak15	Takeley	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Yellow	Green	Yellow	Red	Yellow	Green
18Tak16 (E)	Takeley	Green	Green	Green	Red	Red	Red	Yellow	Red	Yellow	Red	Green	Yellow	Red	Yellow	Green
19Tak16 (E)	Takeley	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Yellow	Green
20Tak16 (E)	Takeley	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Red	Green	Yellow	Red	Yellow	Green

Page 366

Site Ref	Parish/ Settlement	Stansted Airport Public Safety Zone	Noise Contours	Loss of Designated Employment Site	Existing Employment Area	Town or Local Centre	Retail Centre	Primary School	Secondary School	Hospital / Surgery / Community Hospital	Open / Green Space	Loss of Open / Green Space	Cycle Route	Sports Facility / Pitch	Public Right of Way	Development in Area of Relative Deprivation
21Tak16 (E)	Takeley	Green	Green	Green	Red	Green	Green	Red	Yellow	Yellow	Yellow	Green	Yellow	Yellow	Green	Green
22Tak17	Takeley	Green	Yellow	Green	Red	Red	Red	Yellow	Red	Red	Yellow	Green	Green	Red	Yellow	Green
23Tak17	Takeley	Green	Green	Red	Red	Green	Green	Yellow	Yellow	Green	Red	Red	Green	Green	Green	Yellow
01Tha15	Thaxted	Green	Green	Green	Red	Yellow	Yellow	Green	Red	Yellow	Yellow	Green	Yellow	Yellow	Yellow	Red
02Tha15	Thaxted	Green	Green	Green	Red	Red	Red	Red	Red	Red	Yellow	Green	Yellow	Red	Yellow	Red
03Tha15	Thaxted	Green	Yellow	Green	Red	Green	Green	Yellow	Yellow	Green	Red	Green	Yellow	Green	Yellow	Yellow
04Tha15	Thaxted	Green	Yellow	Green	Red	Red	Red	Green	Yellow	Red	Green	Red	Yellow	Red	Yellow	Yellow
05Tha15	Thaxted	Green	Green	Green	Red	Red	Red	Red	Red	Red	Yellow	Green	Yellow	Red	Green	Yellow
06Tha15	Thaxted	Green	Green	Green	Red	Red	Red	Red	Red	Red	Yellow	Green	Yellow	Red	Yellow	Red
07Tha15	Thaxted	Green	Green	Green	Red	Red	Red	Yellow	Red	Green	Green	Red	Yellow	Yellow	Yellow	Yellow
08Tha15	Thaxted	Green	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Yellow	Green	Red
09Tha15	Thaxted	Green	Green	Green	Yellow	Red	Red	Red	Yellow	Red	Red	Red	Yellow	Red	Green	Yellow
10Tha15	Thaxted	Green	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Green	Red
11Tha15	Thaxted	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Red	Green	Yellow	Yellow	Green	Yellow
12Tha15	Thaxted	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Green	Yellow
13Tha15	Thaxted	Green	Green	Green	Red	Green	Green	Yellow	Yellow	Yellow	Yellow	Green	Yellow	Yellow	Green	Yellow
14Tha15	Thaxted	Green	Green	Green	Yellow	Red	Red	Yellow	Green	Green	Yellow	Green	Yellow	Green	Green	Yellow
15Tha15	Thaxted	Green	Green	Green	Yellow	Red	Red	Yellow	Red	Red	Yellow	Green	Yellow	Red	Green	Red
16Tha15	Thaxted	Green	Yellow	Green	Green	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Red	Yellow	Yellow
17Tha15	Thaxted	Green	Yellow	Green	Yellow	Red	Red	Red	Red	Red	Yellow	Green	Yellow	Green	Green	Yellow
18Tha15	Thaxted	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Yellow	Red	Yellow	Green	Green	Yellow

Page 367

Site Ref	Parish/ Settlement	Stansted Airport Public Safety Zone	Noise Contours	Loss of Designated Employment Site	Existing Employment Area	Town or Local Centre	Retail Centre	Primary School	Secondary School	Hospital / Surgery / Community Hospital	Open / Green Space	Loss of Open / Green Space	Cycle Route	Sports Facility / Pitch	Public Right of Way	Development in Area of Relative Deprivation
19Tha15	Thaxted	Green	Green	Green	Red	Red	Red	Green	Red	Red	Yellow	Green	Yellow	Yellow	Green	Red
20Tha15	Thaxted	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Red
01Ugl15	Ugley	Green	Green	Green	Red	Red	Red	Green	Red	Red	Yellow	Green	Yellow	Yellow	Green	Red
02Ugl15	Ugley	Green	Green	Green	Green	Red	Red	Yellow	Red	Red	Red	Green	Yellow	Red	Green	Red
03Ugl15	Ugley	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Yellow	Green	Yellow	Green	Green	Red
04Ugl15	Ugley	Green	Green	Green	Green	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Yellow	Green	Red
05Ugl15	Ugley	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Yellow	Red
01Wen15	Wendens Ambo	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Red
02Wen15 (E)	Wendens Ambo	Green	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Green	Green	Red	Yellow	Red
01WRod15	White Roding	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Yellow	Green	Yellow	Red	Yellow	Red
01Wic15	Wicken Bonhunt	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red	Green	Yellow	Red	Yellow	Red
02Wic15	Wicken Bonhunt	Green	Green	Green	Red	Red	Red	Green	Red	Red	Red	Green	Yellow	Yellow	Green	Red
03Wic17	Wicken Bonhunt	Green	Green	Green	Red	Red	Red	Red	Red	Red	Green	Green	Yellow	Yellow	Yellow	Red
01Wid15	Widdington	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Green	Red
02Wid15	Widdington	Green	Green	Green	Red	Red	Red	Yellow	Red	Red	Red	Green	Yellow	Green	Yellow	Red
01Wim15	Wimbish	Green	Green	Green	Green	Green	Green	Yellow	Yellow	Green	Yellow	Green	Yellow	Green	Green	Red
02Wim15	Wimbish	Green	Green	Green	Green	Red	Red	Yellow	Red	Yellow	Red	Green	Yellow	Red	Green	Red
03Wim15	Wimbish	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Green	Yellow	Red	Yellow	Red
04Wim15	Wimbish	Green	Green	Green	Red	Red	Red	Red	Red	Red	Yellow	Green	Yellow	Red	Yellow	Red

Outline reasons for selection/ rejection

Table IVE below sets out the outline reasons for the selection or rejection of site options.

Table IVE: Outline reasons for selection/ rejection of site options

Site	Preferred / Rejected	Reasons for Selection / Rejection
01Ark15	Rejected	This is a greenfield site, which does not adjoin the existing village development limit. Development would reduce the open countryside gap between the development at Quicksie Hill and the low density development around the church. Arkesden has limited services and facilities and the site is not in walking/cycling distance of basic services which makes this a less suitable site. This site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
02Ark17	Rejected	This site lies to the north of the village beyond adopted development limits. Development of this site would introduce significant development in an isolated rural location. Arkesden has limited services and facilities and the site is not in walking/ cycling distance of basic services which makes this a less suitable site. The site is therefore considered unsuitable as development on the site would not contribute to sustainable patterns of development.
01Ash15	Rejected	This is a greenfield site in the open countryside, unrelated to the village of Ashdon. Ashdon is a type A village with a shop and school; however this site is beyond the normal walking/cycling distance of these services. This site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
02Ash15	Rejected	This is a greenfield site, in the countryside. The site is separated from Bartlow by the former railway line. Bartlow has limited services and facilities, whilst Ashdon is a type A village; the site is not in walking/cycling distance of these basic services. This site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
01Bar15	Rejected	This site is currently a football pitch with car park and pavillion and adjoins the village development limit. The peripheral areas of the site are liable to surface water flooding. Barnston is a Type B village and has limited services. The village is close to Great Dunmow but the site is not within walking/cycling distance of facilities in the town. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
02Bar15	Rejected	This is a greenfield site on the edge of the village. Development would extend the built up extent of the village into the countryside. Barnston has limited services. The village is close to Great Dunmow but the site is not within walking/cycling distance of facilities in the town. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
01Bir15	Rejected	The site lies beyond development limits within the Metropolitan Green Belt, adjacent to the village. The site forms part of parcel 8 in the Green Belt Review 2016 which was found to have a 'strong' value in meeting the purposes of the Green Belt. The site does contribute to the functions of the Green Belt and therefore development is considered unsuitable.
02Bir15	Rejected	The site is an existing business park / employment site and is being promoted for additional employment development. The site forms part of parcel 8 in the Green Belt Review 2016 which was found to have a 'strong' value in meeting the purposes of the Green Belt.
03Bir15	Rejected	The site is within the Green Belt, located between Birchanger and Stansted Mountfitchet. The site forms part of parcel 8 in the Green Belt Review 2016

		which was found to have a 'strong' value in meeting the purposes of the Green Belt. The site does contribute to the functions of the Green Belt and therefore development is considered unsuitable as it would not contribute to sustainable patterns of development.
04Bir15	Rejected	This site is within the Metropolitan Green Belt, adjacent to the village. The site forms part of parcel 8 in the Green Belt Review 2016 which was found to have a 'strong' value in meeting the purposes of the Green Belt. The site does contribute to the functions of the Green Belt and therefore development is considered unsuitable.
05Bir15	-	Site has been withdrawn and resubmitted as 09Bir16.
06Bir15	Rejected	This site is within the Metropolitan Green Belt, adjacent to the village. The site forms part of parcel 8 in the Green Belt Review 2016 which was found to have a 'strong' value in meeting the purposes of the Green Belt. The site does contribute to the functions of the Green Belt and therefore development is considered unsuitable.
07Bir16	Rejected	This is a greenfield site within the Green Belt. The site lies within Parcel 8 of the Green Belt Review which concludes that this parcel performs a 'strong' role in meeting the purposes of the Green Belt. The site's location means that it is not suitable for housing but may be suitable for employment or highway related uses subject to very special circumstances allowing development in the greenbelt.
08Bir16	Rejected	Site adjoins the development limits at a point but lies outside the Adopted Development Limits. The site lies within parcel 8 of the Green Belt Review 2016 which was found to perform strongly against the purposes of the Green Belt. The site is considered unsuitable as it is not in a sustainable location and it contributes to the functions of the Green Belt.
09Bir16	Rejected	This greenfield site lies within the Metropolitan Green Belt. The site is within parcel 8 of the Green Belt Review 2016 which performs strongly against the purposes of the Green Belt. Development would lead to significant development in the Green Belt leading to the coalescence of Stansted Mountfitchet and Birchanger and is therefore not considered a suitable site for development.
10Bir17	Rejected	This site comprises a house and garden. The rear garden lies beyond the development limits and within the Green Belt. The site forms part of parcel 8 in the Green Belt Review 2016 which was found to have a 'strong' value in meeting the purposes of the Green Belt. Although the site is rear garden, it, along with the neighbouring rear garden to the south of the site, do contribute to the functions of the Green Belt and therefore development is considered unsuitable.
01Chr15	Rejected	This site is separate from the main built up village of Chrishall. Chrishall is a Type A village which has a primary school. Although the site is within 800m of the primary school the road does not have a pavement. The village is served by a limited bus service. Development in this location would lead to the consolidation of the existing sporadic development. This site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
01Cla15	Rejected	This site is located to the rear of houses at Hill Green, beyond the development limits. Development of the site would introduce development in depth in an area characterised by loose knot ribbon development. Although Clavering is a Type A village with a primary school and village shop, this site is located beyond the normal walking/cycling distance to these services. This site is considered unsuitable as development on this site would not contribute to sustainable patterns of development. Permission has been granted for a replacement dwelling (UTT/17/3438/FUL Approved with conditions on 12/01/2018).
02Cla15	Rejected	This is a greenfield site which is located on the edge of Wicken Bonhunt village. Development of the site would consolidate the loose knit sporadic development in the location. A 2015 appeal was dismissed on the grounds that the inspector felt that development in this location 'would not serve to protect or enhance the established character and appearance of this part of the countryside' (Para 11) and as a result 'the benefits of the proposal, in terms of its potential to support sustainable growth and expansion of business and enterprise in rural areas, are in this case balanced against the harm to the character and appearance of the area including the natural environment, and the reliance on the use of the car, I conclude that when looked at in the round the proposal is not sustainable development.' This site is considered unsuitable as development on this site would not contribute to sustainable pattern of

		development.
03Cla15	Rejected	This is a greenfield site located beyond the built up part of the main village. It adjoins the conservation area and does not adjoin the existing development limits. The introduction of development in depth would alter the loose knit character of this part of Clavering. Furthermore the site partially lies within a floodplain. The site is therefore considered unsuitable as development would not contribute to sustainable patterns of development.
04Cla15	Rejected	This is a greenfield site adjoining recent residential developments. The site is well located to the village shop and school. It forms part of a larger field and development would extend the village further along Stortford Road into the countryside and the site has no defensible boundaries and would be intrusive in the wider countryside setting.
05Cla15	Rejected	This is a greenfield site well located to the village shop and school. Development of the site would extend residential development along Stortford Road, but not extending further than the existing development on the opposite side. However the site lies on an embankment and sits above the road. Development of the site would not appear as a natural extension of the village and would be intrusive in the wider countryside setting.
06Cla15	Rejected	Part of the site lies within a flood plain and flood risk zone 2. Whilst the site is well related to the village, it lies predominately within a flood zone. The site is therefore considered unsuitable for residential development. The achievability of the site is considered unlikely due to its location within flood Zone 2 and 3.
07Cla15	Rejected	The access to the site is shown from Stortford Road and requires the demolition of a single property. The long access road to the site running adjacent to residential is likely to cause a detrimental impact on surrounding properties and raises concerns over potential highway issues and therefore the suitability of the site for development.
08Cla15	Rejected	The site lies within the conservation area and in proximity to a number of listed buildings. Access to the site lies within a flood risk zone. Development of the site would not intrude into the open countryside; however it would consolidate the loose knit sporadic development in this location, having a detrimental impact on the Conservation area. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
09Cla15	Rejected	This site was subject to an appeal against refusal of planning permission for 31 dwellings (UTT/0507/12/OP). The inspector considered that the site was not in a sustainable location due to its distance from village facilities and the infrequent bus service both leading to a reliance on the car. This site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
10Cla15	Rejected	Although the site does not have a road frontage, access is proposed through the recent development of the former Jubilee works. The site is located beyond the normal walking/cycling distance to services. This site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
11Cla15	Rejected	This is a greenfield site which would extend development along Pelham Road. The site lies adjacent to the Conservation Area and Scheduled Ancient Monument. The northern edge of the site abuts a flood risk zone. It is considered that the development would have a harmful impact on designated heritage assets. An appeal against the refusal of planning permission for 42 dwellings was dismissed in December 2015. The inspector attached considerable weight to the harm caused by the development to the immediate setting of the landscape and countryside in the vicinity of the site. Furthermore he attached considerable importance and great weight to the harm caused by the development to designated heritage assets. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
12Cla15	Rejected	The development of this site would introduce building in depth contrary to character of the area. In the recent appeal decision, (UTT/15/2348/FUL) the Inspector considered that notwithstanding the design benefits of the development 'these benefits are not sufficient to outweigh the harm caused to the surroundings by the proposal'. The inspector also felt that that the proposal did not have regard to the development plan policies for development in the countryside. This site is considered unsuitable as development on this site would not contribute to sustainable patterns of development. (Planning

		permission has subsequently been granted for two dwellings UTT/18/1693/FUL)
13Cla15	Rejected	The development of the site would introduce built development separate from the main built up area of Wicken Bonhunt. Wicken Bonhunt has limited services and facilities and the site is not in walking/cycling distance of basic services. This site is considered unsuitable as development on this site would not contribute to sustainable pattern of development and unacceptable impact on the landscape.
14Cla15	Rejected	This site is separated from the main built up part of the village by an agricultural field (which itself is promoted through the Call for Sites Process (see 17Cla15). The development of the site would introduce significant development in the open countryside. Although Clavering is a Type A village with a primary school and village shop, this site is located beyond the normal walking/cycling distance to these services. This site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
15Cla15	Rejected	This site is being promoted for business units The site is separate from development limits and the development of the site would introduce development in the open countryside. Conversion of the existing rural building may be suitable. Development of the whole site is not suitable because it would intrude into the open countryside and not contribute to sustainable patterns of development.
16Cla15	Rejected	Development of the site would introduce development in depth in an area characterised by loose knot ribbon development. Although Clavering is a Type A village with a primary school and village shop, this site is located beyond the normal walking/cycling distance to these services. This site is considered unsuitable as development on this site would not contribute to sustainable patterns of development. The achievability of developing this site is uncertain due to the ransom strip between the site and the road.
17Cla15	Rejected	Development of the site would extend development westwards along Pelham Road and into the open countryside. Although Clavering is a Type A village with a primary school and village shop, this site is located beyond the normal walking/cycling distance to these services. This site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
18Cla15	Rejected	Development of the site would introduce significant development in an area characterised by loose knit ribbon development. Although Clavering is a Type A village with a primary school and village shop, this site is located beyond the normal walking/cycling distance to these services. This site is considered unsuitable as development on this site would not contribute to sustainable patterns of development. The achievability of developing the site for affordable housing is uncertain as the need for affordable housing needs is to be assessed.
19Cla15	Rejected	Part of this greenfield site lies within the Development Limits, however the majority of the site lies outside the Development Limits. Development of this site would introduce development to the rear of existing properties out of character with the current pattern of development. Although Clavering is a Type A village with a primary school and village shop, this site is located beyond the normal walking/cycling distance to these services. This site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
20Cla15	Rejected	Development of the site would extend development northwards mirroring the extent of the development opposite. Although Clavering is a Type A village with a primary school and village shop, this site is located beyond the normal walking/cycling distance to these services. This site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
21Cla15	Rejected	Development of the site would extend development northwards mirroring the extent of the development opposite but also in developing in depth. Clatterbury Lane is characterised by ribbon development and the development of this site would be out of character with the current pattern of development. Although Clavering is a Type A village with a primary school and village shop, this site is located beyond the normal walking/cycling distance to these services. This site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.

22Cla15	Rejected	Part of the site, through which the access is proposed lies within a flood plain. The need to provide a green buffer to the south so that development avoids the flood plain results in the development extending into the open countryside, unrelated to the existing pattern of development. Development of the site is therefore considered unsuitable. The achievability of the site depends on the outcome of a full flood risk assessment and consideration of mitigation measures.
23Cla15	Rejected	Part of the site, through which the access to the residential development is proposed lies within a flood plain. The need to provide a green buffer to the south so that development avoids the flood plain results in the development extending into the open countryside, unrelated to the existing pattern of development. Development of the site is therefore considered unsuitable. The achievability of the site depends on the outcome of a full flood risk assessment and consideration of mitigation measures.
01Deb15	Rejected	Development of the site would introduce a built form in the open countryside and intensify sporadic development. The site is not within cycling/walking distance of services or amenities. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
02Deb15	Preferred	This site has been allocated for 25 The site adjoins the village of Debden, a Type A village. The site is in walking/cycling distance of the village school and shop. It is considered that the development of this site would contribute to a sustainable pattern of development. The site is considered suitable, available and achievable.
03Deb15	Rejected	This site adjoins the site 02Deb15. This site is being promoted as a second phase of development to take place later in the plan period. Debden is a Type A village and the site is in walking/cycling distance of the village school and shop. It is therefore considered that the development of this site as a comprehensive development with 02Deb15 would contribute to a sustainable pattern of development. Notwithstanding this an executive decision was made by Members (Council 19 June 2018) to attach specific weight to the cumulative scale of development and the site is considered unsuitable.
04Deb15	Rejected	This is a greenfield site containing an agricultural building situated in an isolated location between Debden and Henham. This site is considered unsuitable as development on this site would not contribute to sustainable pattern of development.
05Deb15	Rejected	This site, for employment purposes, is a greenfield site containing agricultural buildings situated in an isolated location between Debden and Henham. This site is considered unsuitable as development on this site would not contribute to sustainable pattern of development. The site may be appropriate for employment uses supporting the rural economy but it is not appropriate to allocate a site in this isolated location in the local plan.
01Elm15	Rejected	Development of the site would extend the ribbon development eastwards, mirroring the extent of the development opposite. The site is on raised ground and development would be prominent in the landscape. Elmdon has a current lack of services and not considered a sustainable location for development, and the site is therefore not considered suitable.
01Els15	Rejected	This is a mixed greenfield and brownfield site within the Countryside Protection Zone with a proposal to extend the existing development and permissions to develop further office floorspace and conference centre and resort. The site forms part of parcel 9 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a moderate level of harm to the purposes of the CPZ.
02Els15	Preferred	This is a greenfield site and forms part of the larger development north of Stansted Road. Outline planning permission granted 14th November 2016 (UTT/15/3090/OP)
03Els15	Rejected	This is a greenfield site adjoining a site with planning permission for residential development, Alsa Wood, and existing residential development to the north. The site acts as a buffer between the residential development and the Ancient Woodland of Alsa Wood. It is considered that residential development abutting the woodland would put pressure on the woodland habitat. The site is therefore considered unsuitable for development.
04Els15	Rejected	This is a greenfield site between the M11 and a site with planning permission for residential development. It abuts the Ancient Woodland of Alsa Wood to the north. The majority of the site lies within the poor air quality zone along the M11. The site is considered unsuitable as development on the site would not

		contribute to sustainable patterns of development. Achievability of the site is uncertain due to the majority of the site falling within the M11 poor air quality zone.
05Els15	Rejected	The site is in proximity to natural and historic assets. Elsenham is a key village with a range of services and facilities. The proposal is to include a school, retail, health centre and community uses within the development. Planning permission for 800 dwellings (UTT/13/0808/OP) was refused and an appeal was dismissed on a number of grounds, including the development causing harm both to the landscape and views across it (Para 33), the loss of best and most versatile agricultural land (Para 34) and traffic impacts (Paras 35-38).
06Els15	Rejected	The southern area of the site lies within the Countryside Protection Zone. The site is in proximity to natural and historic features. A smaller development of 800 houses was subject to appeal, which was dismissed on a number of grounds including the development causing harm both to the landscape and views across it (Para 33), the loss of best and most versatile agricultural land (Para 34) and traffic impacts (Paras 35-38). For these reasons the site as submitted is considered unsuitable.
07Els15	Rejected	The southern area of the site lies within the Countryside Protection Zone. The site is in proximity to natural and historic features. A smaller development of 800 houses was subject to an appeal, which was dismissed on a number of grounds. The appeal was dismissed on a number of grounds, including the development causing harm both to the landscape and views across it (Para 33), the loss of best and most versatile agricultural land (Para 34) and traffic impacts (Paras 35-38). For these reasons the site as submitted is considered unsuitable.
08Els15	Preferred	This is a greenfield site, within the Countryside Protection Zone, on the southern edge of the village. The site was recommended for removal in the 2016 Countryside Protection Zone Review and has been subsequently removed. The site is well related to Elsenham and is in cycling/walking distance of shops, a school and a surgery. Development of the site is considered suitable because it would contribute to a sustainable pattern of development.
09Els15	Rejected	To the east of the site lies Elsenham Hall parkland. The northern boundary of the site lies within the flood zone. The land south of Stansted Brook starts to gradually rise southwards. It is considered that this site is seen more as part of the countryside than to the village of Elsenham and development of the site would extend development into the countryside and is therefore considered unsuitable.
10Els16	Rejected	There are a number of listed buildings near the site. The site is some distance from Elsenham village, and it is therefore considered that this is not a sustainable location for residential development. As the expansion of Elsenham Meadows (01ELS15) has been rejected this adjoining site is not considered suitable for employment development. The site lies within parcel 9 of the Countryside Protection Zone review 2016 which is assessed as having a moderate harm to the purposes of the CPZ were the parcel to be released from the Zone.
11Els17	Rejected	This greenfield site lies adjacent to and beyond the development limits on the eastern side of Elsenham. The suitability of this site depends on whether the surrounding land to the north and east, being promoted by Fairfield Partnership, is considered suitable for development, which it is not. The site promoters advise that there is a ransom strip between the paddock and current Hales Wood development. There is a covenant on the land that expires October 2019. The achievability of developing this site is therefore uncertain due to the ransom strip between the site and Hailes Wood.
01Far15	Rejected	This is a greenfield site adjacent to the southern edge of the village. There is no development limit defined around Farnham. A thin strip along the southern boundary of the site and a small area on the western boundary has a low to medium risk of surface water flooding. To the south is a complex of listed buildings. The access road to the site is narrow and is a constraint to development of the site. This is a small site not considered suitable to allocate in the Local Plan
02Far15	Rejected	This is a greenfield site adjacent to the south eastern edge of the village. There is no development limit defined around Farnham. There is a high risk of surface water flooding along the western boundary of the site and a small area of low risk on the north east corner.. There is a listed building to the south and to the north of the site. Although Farnham is a Type A village with a primary school it has limited other services. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.

03Far15	Rejected	This is a greenfield site adjacent to the southern edge of the village. It is an extension to the site promoted at 01Far15. There is no development limit defined around Farnham. Small areas of the site are subject to low level of surface water flooding. To the south is a complex of listed buildings. The access road to the site is narrow and is a constraint to development of the site. Although Farnham is a Type A village with a primary school it has limited other services. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
04Far15	Rejected	This is a greenfield site adjacent to the southern edge of the village. There is no development limit defined around Farnham. A thin strip along the boundary of the site has a low to medium risk of surface water flooding. To the south is a complex of listed buildings. The access road to the village is narrow and is a constraint to development of this scale. Although Farnham is a Type A village with a primary school it has limited other services. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
01Fel15	Preferred (part of site)	This is a greenfield site which lies on the western edge of the village. Felsted and Flitch Green to the north are Type A villages with a range of services and facilities. Development of the full extent of the site would lead to coalescence with Flitch Green; however development reflecting the limit of the development on the south of Station Road could be considered suitable.
02Fel15	Rejected	This is a part greenfield, part brownfield site comprising house and garden at Bartholomew Green, which is a small hamlet on the eastern edge of the parish. Development of the site would introduce significant built form in an area characterised by loose knit, sporadic development. The site is not within walking/cycling distance of services and facilities. This site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
03Fel15	Rejected	The site, promoted for employment development, is outside of adopted development limits. It is also within Flood Risk Zone 3, with additional surface water flood risk issues. There are also concerns regarding appropriate highways access. The site is considered unsuitable for development.
04Fel15	Rejected	The site lies adjacent to the development limits and well related to the hamlet, but it is part of a large open field with no defensible boundaries. The site is some distance from the services in Felsted village. The proposal is for a small scale development which falls below the threshold for allocations in the Local Plan.
05Fel15	Rejected	The site is some distance from the services in Felsted village. The site can only be accessed via the long access road which would lead to development disjointed from the existing pattern of development. The long access road to the site running adjacent to residential is likely to cause a detrimental impact on surrounding properties. The site is therefore considered unsuitable as development on the site would not contribute to sustainable patterns of development.
06Fel15	Rejected	This is a greenfield site on the eastern edge of Felsted village. Chaffix Farm to the south comprises a group of listed buildings. The site is about 1km from the services in Felsted. Development of the site would extend the built form eastwards behind the loose knit complex of buildings of Chaffix Farm and close the gap between Felsted and Watch House Green. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
07Fel15	Rejected	The site is L-shaped with a listed building being located at the bend in the site. The site is within walking/cycling distance of the primary school but services in Felsted are further away. A residential scheme has recently been construction to the south, separated from this site by one field, which is a preferred site for development (17Fel15) , However the southern boundary of the site is well vegetated and forms a strong defensible boundary. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
08Fel15	Rejected	The site is not within walking/cycling distance of the village services in Watch House Green and Felsted village. Development of the site would introduce a consolidated built form in an area characterised by loose knit ribbon development. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development. The achievability of developing the site is unknown until potential contamination is investigated and the cost of any mitigation known; the costs of clearing and removing the existing buildings on the site would also need to be taken into account.

09Fel15	Rejected	This is a greenfield site to the west of Bannister Green and separated from the existing development limits in an area characterised by a loose knit group of houses served by a single track lane. Aylands is a listed building and adjoins the access to the site. Development of the site would introduce a consolidated form of development contrary to the current character of the area. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
10Fel15	Rejected	This is a small greenfield site located separate from the current development limits of Causeway End and Felsted village. The site is not within walking/cycling distance of the facilities in Felsted and the primary school in Watch House Green. The development of this site would introduce a form of development unrelated to the current character of the area. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
11Fel15	Rejected	This is a greenfield site on edge of the District with Braintree District and is being proposed as part of an extension to Great Notley. The Adopted Master Plan for Land West of the A131 Great Notley (January 2012 identifies the land for employment uses with strategic landscaping between the industrial uses and the district boundary and this site. Therefore this site is not considered suitable. This site is currently not achievable under the current adopted Master Plan for land west of the A131 Great Notley.
12Fel15	Preferred	Planning permission has been granted for this site.
13Fel15	Rejected	Planning permission for 55 dwellings was refused and dismissed at appeal. It is in walking/cycling distance of the primary school at Watch House Green and facilities in Felsted. The Inspector concluded that the development would have a materially harmful impact on the character and appearance of the area. In the light of the appeal decision the site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
14Fel15	Rejected	This is a greenfield site which would wrap development around the southern edge of Felsted. Development of the site would lead to coalescence between Felsted and Causeway End. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
15Fel15	Rejected	The site is situated just over 1km from the facilities in Felsted Village and not within walking/cycling distance of primary schools at Watch House Green and Fritch Green. This area of Causeway End does not have footpaths. Development would introduce backland development in an area characterised by ribbon development. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
16Fel15	Rejected	The site, as a large garden, currently acts as a transition between village and countryside. The current character of west of Braintree Road is of linear development. The development of this site of the scale proposed would introduce development in depth and would have a detrimental impact on the character of this edge of village location. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
17Fel15	Preferred	The site is within walking/cycling distance of the primary school and facilities in Felsted are just under 2km away. The site would extend development into the countryside but would reflect the recent development to the south, from which access can be taken. The site is considered suitable, achievable and available for development.
18Fel15	Rejected	This is one of six greenfield sites proposed around Watch House Green. The site is within walking/cycling distance of the primary school and facilities in Felsted are just less than 2km away. The site is in walking distance of an hourly bus service. This site is less well related than 17Fel15 to existing pattern of development and is not considered suitable for housing development.
19Fel15	Rejected	Development of the site could lead to coalescence with Felsted village. The frontage part of the site forms part of a larger site which was dismissed at appeal. The Inspector concluded that the intrusion of built development to this particular location, which is open on both sides of the road, would be significantly harmful. Although this site does not extend as far along Braintree Road it is still considered that development would be intrusive and close the gap with Felsted village. The site is therefore considered unsuitable as development on the site would not contribute to sustainable patterns of development.

20Feb15	Rejected	Development of the site could lead to coalescence with Felsted village. The frontage part of the site forms part of a larger site which was dismissed at appeal. The Inspector concluded that the intrusion of built development to this particular location, which is open on both sides of the road, would be significantly harmful. Although this site does not extend as far along Braintree Road it is still considered that development would be intrusive close the gap with Felsted village. The site is therefore considered unsuitable as development on the site would not contribute to sustainable patterns of development.
21Feb15	Rejected	Development of the site would introduce a consolidated built form in an area characterised by loose knit ribbon development. On its own the site is considered unsuitable as development on this site would not contribute to sustainable patterns of development. In conjunction with the other sites being promoted at Sparlings Farm about 1,100 dwellings and employment land are being proposed which could be considered as a new village, however the Council's development strategy is towards larger self-sustaining Garden Communities which can support a secondary school.
22Feb15	Rejected	Development of the site would introduce a consolidated built form in an area characterised by loose knit ribbon development. On its own the site is considered unsuitable as development on this site would not contribute to sustainable patterns of development. In conjunction with the other sites being promoted at Sparlings Farm about 1,100 dwellings and employment land are being proposed which could be considered as a new village, however the Council's development strategy is towards larger self-sustaining Garden Communities which can support a secondary school.
23Feb15	Rejected	This proposal is for about 480 houses on the west side of the hamlet. Gransmore Green is characterised by a loose knit collection of houses and farm buildings. The site is not within walking/cycling distance of the village services in Watch House Green and Felsted village. Development of the site would introduce a consolidated built form in an area characterised by loose knit ribbon development; and a scale of development disproportionate to the size of the hamlet of Gransmore Green. On its own the site is considered unsuitable as development on this site would not contribute to sustainable patterns of development, unless facilities can be provided on site which may prejudice viability. In conjunction with the other sites being promoted (08, 03, and 21 to 27Feb15) about 1,100 dwellings and employment land are being proposed which could be considered as a new village; however the Council's development strategy is towards larger self-sustaining Garden Communities which can support a secondary school.
24Feb15	Rejected	This is a greenfield site and one of 8 sites being promoted around Gransmore Green. This proposal is for up to 33 houses on the east side of the hamlet. Gransmore Green is characterised by a loose knit collection of houses and farm buildings. The site is not within walking/cycling distance of the village services in Watch House Green and Felsted village. Development of the site would introduce a consolidated built form in an area characterised by loose knit ribbon development. On its own the site is considered unsuitable as development on this site would not contribute to sustainable patterns of development. In conjunction with the other sites being promoted (08, 03, and 21 to 27Feb15) about 1100 dwellings and employment land are being proposed which could be considered as a new village; however the Council's development strategy is towards larger self-sustaining Garden Communities which can support a secondary school.
25Feb15	Rejected	This is a greenfield site and one of 8 sites being promoted around Gransmore Green. This proposal is for about 230 houses on the east side of the hamlet. Gransmore Green is characterised by a loose knit collection of houses and farm buildings. The site is not within walking/cycling distance of the village services in Watch House Green and Felsted village. Development of the site would introduce a consolidated built form in an area characterised by loose knit ribbon development; and a scale of development disproportionate to the size of the hamlet of Gransmore Green. On its own the site is considered unsuitable as development on this site would not contribute to sustainable patterns of development. In conjunction with the other sites being promoted (08, 03, and 21 to 27Feb15) about 1100 dwellings and employment land is being proposed which could be considered as a new village; however the Council's development strategy is towards larger self-sustaining Garden Communities which can support a secondary school.

26Fel15	Rejected	This is a greenfield site and one of 8 sites being promoted around Gransmore Green. This proposal is for about 116 houses on the west side of the hamlet. Gransmore Green is characterised by a loose knit collection of houses and farm buildings. The site is not within walking/cycling distance of the village services in Watch House Green and Felsted village. Development of the site would introduce a consolidated built form in an area characterised by loose knit ribbon development; and a scale of development disproportionate to the size of the hamlet of Gransmore Green. On its own the site is considered unsuitable as development on this site would not contribute to sustainable patterns of development. In conjunction with the other sites being promoted (08, 03, and 21 to 27Fel15) about 1100 dwellings and employment land are being proposed which could be considered as a new village; however the Council's development strategy is towards larger self-sustaining Garden Communities which can support a secondary school.
7Fel15	Rejected	This is a greenfield site and one of 8 sites being promoted around Gransmore Green. This proposal is for about 246 houses on the west side of the hamlet. Gransmore Green is characterised by a loose knit collection of houses and farm buildings. The site is not within walking/cycling distance of the village services in Watch House Green and Felsted village. Development of the site would introduce a consolidated built form in an area characterised by loose knit ribbon development; and a scale of development disproportionate to the size of the hamlet of Gransmore Green. On its own the site is considered unsuitable as development on this site would not contribute to sustainable patterns of development. In conjunction with the other sites being promoted (08, 03, and 21 to 27Fel15) about 1100 dwellings and employment land are being proposed which could be considered as a new village; however the Council's development strategy is towards larger self-sustaining Garden Communities which can support a secondary school.
8Fel15	Rejected	This is a greenfield site which is located south of Causeway End. It does not adjoin the development limits and is separated from the development limits by four detached properties in large grounds. The site is beyond walking and cycling distance of services and facilities in the village. Development of the site would extend the ribbon development into the countryside. The site is therefore considered unsuitable because development on this site would not contribute to sustainable patterns of development.
9Fel16	Rejected	This part greenfield and part brownfield site lies on the south side of Causeway End. The access road to the site lies within the Adopted Development Limits, the remaining site area however lies outside the development limits. The site is situated just over 1km from the facilities in Felsted Village and not within walking/cycling distance of primary schools at Watch House Green and Fritch Green. This area of Causeway End does not have footpaths. Development would introduce backland development in an area characterised by ribbon development. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
30Fel16	Rejected	This brownfield sites lies within the small hamlet of Mole Hill Green, Felsted. The site lies approximately 1km from Leez Priory ancient monument. There are numerous listed buildings near the site. The site is not close to village services and facilities. Development of the site as proposed would introduce significant built form in an isolated rural setting leading to unsustainable development. Development of the site is therefore not considered suitable.
01GtCan15	N/A	"This is an existing Gypsy caravan site and has an extant planning permission for 3 pitches. The recent approval was for an additional 2 pitches. The site lays about 1,300m from the services and facilities at Takeley and Priors Green. In view of the existing use and planning permissions this is considered a suitable site for the use proposed. Planning permission for 2 additional pitches was granted in October 2015 (UTT/15/2526/FUL) and for 1 additional pitch in 2018.
02GtCan15	Rejected	This is a greenfield site located within the hamlet of Great Canfield. The hamlet is characterised by a loose knit development set out in a linear arrangement. Canfield Road does not have a pavement. Development of the site would introduce a built form on open land to the west of the road which currently affords wide views into the open countryside. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
03GtCan15	Rejected	This is a greenfield site located within the hamlet of Great Canfield. The hamlet is characterised by a loose knit development set out in a linear arrangement. Canfield Road does not have a pavement. Development of the site would introduce a built form on open land to the west of the road which currently affords wide views into the open countryside. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of

		development.
04GtCan15	Rejected	This is a greenfield site just south of the Flitch Way. Canfield Road does not have a pavement. Development of the site would introduce a significant built form linking the hamlet of Great Canfield and Takeley village. Planning application reference UTT/18/0318/OP has been refused. The impact of the cost of highway improvements needs to be considered.
05GtCan15	Rejected	This is a part greenfield part brownfield site located within the hamlet of Great Canfield. The hamlet is characterised by a loose knit development set out in a linear arrangement. Land to the east has planning permission for 7 dwellings (UTT/15/1732/FUL). Canfield Road does not have a pavement. Although not within walking/cycling distance of the services in Takeley, the site is in close proximity and could be considered a sustainable location for small scale development; however the site is considered too small to allocate within a strategic Plan.
06GtCan17	Rejected	Local wildlife sites of Runnels Hey, Priors Wood and Canfield Hart lie within 1km of the site. Canfield Road does not have a pavement. Development of the site would introduce a significant built form linking the hamlet of Great Canfield and Takeley village. Development of the site is achievable but The impact of the cost of highway improvements needs to be considered.
07GtCan17	Rejected	This greenfield site lies beyond development limits. Canfield Hart ancient woodland and local wildlife site lies to the south of the site. A small number of listed buildings are located to the south of the site at Great Canfield Park. The footpath along the B183 does not extend as far as this site. The development of this site would introduce significant development in the countryside, extending development south of the Flitch Way which currently acts as a defensible boundary to development at Takeley. Development of the site would also introduce a significant built form linking the hamlet of Great Canfield and Takeley village. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
01GtChe15	Rejected	The site is located between the rail line and the motorway. Great Chesterford is a key village but this site is separated from the main village by the railway line. This is therefore considered an unsuitable site for development. The cost of mitigation measures against noise needs to be considered.
02GtChe15	Rejected	Zone 1 lies beyond the development limits whilst Zone 2 lies adjacent to the limits. Both sites lie within Ancient Monuments. Zone 2 is currently a wooded area. The sites are within walking/cycling distance of the facilities in the village centre. The sites are considered unsuitable due to their location within ancient monuments and the loss of woodland at Zone 2. Development of the site is achievable subject to the cost of site preparation of former minerals site.
03GtChe15	Rejected	This site is located within the Conservation Area. Chesterford House is Grade 2 listed and set in established gardens where many of the trees are protected by a preservation order. The Great Chesterford Conservation Area Appraisal and Management Proposals April 2007 identifies the mature trees as making a very valuable contribution to the quality of the conservation area whilst the open quality of the grounds contrasts with the more enclosed built form of the street scene to the west, this providing additional variety of form, colour, scale and shape. The Historic Settlement Character Assessment 2007 of Great Chesterford considers that Development in Chesterford House would be damaging and diminish the sense of place and local distinctiveness of the settlement. Development of the site is therefore considered unsuitable due to the impact on the setting of the listed building, the tree preservation orders and the conservation area.
04GtChe15	Rejected	This is a greenfield site located within the conservation area. The south eastern part of the site is covered by a Tree Preservation Order. The Historic Settlement Character Assessment 2007 for Great Chesterford states that this open space within the conservation area would detrimentally impact on the adjacent historic core. Another principal effect of development would be to loose distinct elements of the village such as the loss of the fine parkland characteristics of the curtilage of The Delles. It is considered that development of this site would be highly damaging and significantly diminish the sense of place and local distinctiveness of the settlement. The Great Chesterford Conservation Area Appraisal identifies the contribution which the trees in the grounds to The Delles and the boundary wall make to the conservation area. Planning permission has been granted for 2 dwellings.

06GtChe15	Rejected	The site incorporates a site for a primary school or community uses which abuts the conservation. The western end of the site includes an ancient monument and is proposed as open space and secondary access. The southern edge of the site lies within flood risk zones 2 and 3 and are proposed for open space and allotments. The site lies within close proximity to North Uttlesford Garden Community and would lead to reducing the separation of the village and Garden Community. The site is not considered suitable for development. The achievability of the site is uncertain due to the flood risk zones and scheduled ancient monument and ability to mitigate both.
07GtChe15	Rejected	The site incorporates a site for a primary school or community uses which abuts the conservation area. The south western end of the site includes an ancient monument which is proposed as open space and secondary access. The southern edge of the site lies within flood risk zones 2 and 3 which is proposed for open space and allotments. The site lies within close proximity to North Uttlesford Garden Community and would lead to reducing the separation of the village and Garden Community. The site is therefore not considered suitable for development.
01GtDun15	Preferred	This is a greenfield site in the western side of Great Dunmow. It lies beyond the development limits of the Great Dunmow Neighbourhood Plan. It adjoins the 'made' development area and the adjacent land south of the B1256 is allocated for development in the 'made' Great Dunmow Neighbourhood Plan. Land to the north of the B1256 and east of High Wood has been granted planning permission for development. Land to the west of this site has been proposed through the call for sites (SLAA reference 03GtDun15). Opposite the site is High Wood SSSI. The site is in walking/cycling distance of services and facilities in Great Dunmow, particularly if the adjoining sites are developed and include a secondary school, medical facilities and areas for sport and recreation. The site is therefore considered suitable, available and developable. .
02GtDun15	Rejected	This is a greenfield site located in the countryside on the road to Stebbing, some distance from Great Dunmow. The area is characterised by farms and isolated dwellings. Development of the site would introduce a concentration of development in an area characterised by loose knit sporadic development. The site is considered unsuitable as development on this site would not contribute to a sustainable pattern of development.
03GtDun15	Rejected	The site is some distance from the existing development limits but the intervening land south of the B1256 is was allocated for development in the 2014 submission Local Plan (subsequently withdrawn) and is proposed through this call for sites (SLAA reference 12GtDun15). To the north of the B1256 the land has been granted planning permission for development. Land immediately to the east of this site has been proposed through the call for sites (SLAA reference 01GtDun15). Opposite the site is High Wood SSSI. Once the adjoining sites are developed High Wood SSSI and Buttleys Lane will form the western edge to development. The suitability of this site is dependent upon and should be reassessed following the delivery of the adjacent site (12GtDun15). The site is therefore considered broadly developable but not deliverable within the plan period. However, due to the site's location next to the A120 and particularly the junctions on to the A120, the site may be more suitable for uses other than residential.
04GtDun15	Rejected	The site is too small / the yield is not large enough to warrant consideration within a strategic Plan.
05GtDun15	Preferred	This site has planning permission for 99no residential units and is under construction.
06GtDun15	Preferred	The site is considered suitable and available and development is considered achievable. The site is included for development in the 'made' Great Dunmow Neighbourhood Plan.
07GtDun15	Preferred	This site adjoins a site where planning permission has been granted for 790 homes opposite the development of Woodlands Park. The site forms part of the 'Land West of Woodside Way' allocation in the 'made' Great Dunmow Neighbourhood Plan.

08GtDun15	Preferred	This site is allocated for development in the 'made' Great Dunmow Neighbourhood Plan and the Regulation 18 Local Plan 2017. The site is considered suitable for development as part of a comprehensive development including land south of Stortford Road for residential and secondary school and sixth form centre.
09GtDun15	Rejected	This greenfield site lies on the eastern edge of the town adjoining the development limits. The site is in walking/cycling distance of services and facilities in the town. The site forms an integral part of the historic setting of Dunmow Park, the loss of which is considered unsuitable.
10GtDun15	Rejected	The site is separated from Great Dunmow by the A120 and appears as part of the countryside rather than Great Dunmow. The development of this site of the scale proposed would introduce a significant scale of development in an area characterised by farmsteads and single properties in a countryside setting. The site has planning permission for 5 dwellings. However a more intensive scale of development is considered unsuitable it would not contribute to sustainable patterns of development
11GtDun15	Rejected	This is a greenfield site. Land to the south-west of the site has planning permission for custom build development. This submission is for an extension to that custom build site. It is considered that the development of this site would extend the development of St Edmunds Lane eastwards into the valley and open countryside unrelated to the pattern of development along St Edmunds Lane and is therefore considered unsuitable.
12GtDun15	Preferred	This is a greenfield site adjoining the western edge of the town and opposite a site with planning permission for residential development. The site is allocated for development in the 'made' Great Dunmow Neighbourhood Plan 2015 as part of a comprehensive development including a health centre and a new secondary school. The site is considered suitable for development.
13GtDun15	Rejected	The site is close to conservation area and St Mary's Church. The site is over 800m walking/cycling distance from the services and facilities in the town. It is considered that the development of this site would introduce significant built form, northwards along the Chelmer Valley unrelated to the pattern of development of Church End to the detriment of the character of the landscape and the setting of the Conservation Area and the Church. The site is therefore considered unsuitable as development would not contribute to a sustainable pattern of development.
14GtDun15	Rejected	The site is over 800m walking/cycling distance from the services and facilities in the town. It is considered that the development of this site would introduce significant built form, northwards along the Chelmer Valley unrelated to the pattern of development of Church End. The site is therefore considered unsuitable as development would not contribute to a sustainable pattern of development.
15GtDun15	Rejected	The site does not adjoin existing development limits but adjoins the conservation area at Parsonage Downs and Church End. The north eastern edge of the site lies within Flood Zones 2 and 3. A number of the adjoining buildings are listed and there is a scheduled ancient monument outside the site at Parsonage Farm. The development of this site would introduce an area of extensive built development on the slopes of the Chelmer Valley to the detriment of the character of the landscape and the setting of the conservation area.
16GtDun15	Rejected	This is a greenfield site located to the east of the B1256 and does not adjoin the existing development limits. The site is located over 800m from the schools and town centre services and would involve crossing the B1256 making it unattractive to access these services on foot or bike. The south western edge of the site falls within Flood Risk Zones 2 and 3. It is considered that development of this site would introduce an area of significant development unrelated to and separate from Great Dunmow. The site is therefore considered unsuitable as development on this site would not contribute to a sustainable pattern of development.
17GtDun15	Rejected	This is a greenfield site located between the B1256 and the Braintree Road. A large proportion of the site is covered by Flood Risk Zones 2 and 3. Development of the site is not considered suitable because of its location within the flood zones. Only a very small proportion of the site lies outside flood zones 2 and 3 and therefore development of the site is not considered achievable.
18GtDun15	Rejected	This is a greenfield site adjacent to Church End and is over the 800m walking/cycling distance from the services and facilities in the town of Great Dunmow. The development of this small site could be designed so as to be well related to the existing pattern of development at Church End. Notwithstanding this an

		executive decision was made by Members (Council 19 June 2018) to attach specific weight to the previous appeal dismissal.
19GtDun15	Preferred (Development Opportunity Site)	The site lies adjacent to the Town Centre and outside the conservation area. The site is identified in the 2017 Regulation 18 Local Plan as a Development Opportunity Site for Town Centre uses. This could include residential development as well as retail, office and community uses. Redevelopment of the site would remove the depot, an inappropriate use, from the town centre. The site is within walking distance of the services and facilities in the town and is therefore considered suitable for residential development to be included in its redevelopment.
20GtDun16	Rejected	The site is separate from Adopted Development Limits. The site is located some distance from Great Dunmow and beyond expected walking distances to services and facilities. Development of the site would introduce significant built form in an area characterised by sporadic development. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
21GtDun17	Rejected	The site is too small / the yield is not large enough to warrant consideration within a strategic Plan.
01GtEas15	Rejected	This is a greenfield site located in the countryside between the loose knit development at Blamsters and the along Little Cambridge Road. The site is some distance from village facilities and services such as a primary school. The development of the site would introduce an area of significant built form in the countryside, coalescing the existing sporadic development. The site is therefore considered unsuitable as development on this site would not contribute to sustainable patterns of development.
02GtEas15	Rejected	There are 2 listed buildings adjoining the site but development could be so designed as to have minimal impact on them. The site is some distance from village facilities and services such as a primary school. The development of the site would introduce an area of significant built form in the countryside, coalescing the existing sporadic development. The site is therefore considered unsuitable as development on this site would not contribute to sustainable patterns of development.
03GtEas15	N/A	The site has been withdrawn by the applicant.
04GtEas15	Preferred	The site lies adjacent to the development limits. The village school is located just outside the village, but it still may be feasible to walk or cycle. The site is otherwise well related to the village. Land to the north adjoining the site has permission for 9 dwellings. Development of the whole site (the originally submitted 40 dwellings) would extend development further into the countryside than existing development and development of only part of the site may be more suitable (the site is allocated for 20 dwellings).
01GtHal15	Rejected	This is a greenfield site located within the Countryside Protection Zone. The site is located some distance from any services and facilities in the nearby village of Little Hallingbury. The site is subject to aircraft noise. Development of this site would introduce a significant scale of development in a small rural hamlet. The site lies within parcel 2 of the Countryside Protection Zone review 2016 which is assessed as having a high harm to the purposes of the CPZ were the parcel to be released from the Zone. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
02GtHal15	Rejected	This is a greenfield site located within the Countryside Protection Zone at the western end of Start Hill. The site forms part of parcel 1 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a moderate level of harm to the purposes of the CPZ. The site is located some distance from any services and facilities such as a primary school. Development of this site would introduce a significant scale of development in a small hamlet. The site is subject to air noise. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.

03GtHal15	Rejected	This is a greenfield site on the edge of Bishop's Stortford wholly within the Green Belt. The site forms part of parcel 12 in the Green Belt Review 2016 which was found to have a 'strong' value in meeting the purposes of the Green Belt. The site does contribute to the functions of the Green Belt and therefore development is considered unsuitable.
04GtHal16	Principal Employment Area Policy EMP1/Appendix 6	This site is being promoted for employment development. This is an existing business park located on the B1256 in close proximity to the M11. The site is within the Countryside Protection Zone and contains listed buildings and adjoins an Ancient Woodland. The site is subject to air noise. The listed buildings have been successfully preserved and enhanced by the existing development. The site forms part of parcel 2 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a high level of harm to the purposes of the CPZ. The suitability of the intensification of this site will be determined through development management purposes.
06GtHal16	Rejected	The site is beyond Adopted Development limits. The site is in the 57 LEQ aircraft noise contours during the day and 54 LEQ at night. The site is also on Grade 2 agricultural land. The site is located some distance from any services and facilities in the nearby village of Little Hallingbury. The development of the site would introduce significant development in a location characterised by sporadic development. Development of the site would coalesce the development of Bedlar's Green with the development on Church Road. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
07GtHal16	Rejected	The site is located outside of development limits and is in close proximity to a LoWS and is in an area of moderate to high landscape sensitivity. The site is within the Countryside Protection Zone. The site forms part of parcel 1 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a moderate level of harm to the purposes of the CPZ. The site is also in close proximity to a heritage asset. The site is therefore considered to be unsuitable.
08GtHal16	Principal Employment Area Policy EMP1/Appendix 6	This updated call call for sites submission (see also 04GtHal15) highlights capacity for a further 1,890 sq m of B1 office accommodation, in addition to that recently consented. This is an existing business park located on the B1256 in close proximity to the M11. The site is within the Countryside Protection Zone and contains listed buildings and adjoins an Ancient Woodland. The site is subject to air noise. The listed buildings have been successfully preserved and enhanced by the existing development. The site forms part of parcel 2 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a high level of harm to the purposes of the CPZ. The suitability of the intensification of this site will be determined through development management purposes.
09GtHal16	Rejected	The site is located outside of development limits and is in close proximity to a LoWS, ancient woodland and is in within the Countryside Protection Zone. The site is also in close proximity to a heritage asset. The site forms part of parcel 2 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a high level of harm to the purposes of the CPZ. Although the site adjoins Thremhall Park Business Centre this site would introduce significant development in the Countryside Protection Zone leading to coalescence with the airport. The site is therefore considered to be unsuitable.
01GtSam15	Rejected	This is a large greenfield site adjoining the north eastern edge of the village. The proposal is for a scale of development of up to 100 dwellings. Three small parcels of land (which lie within this larger submission site) were dismissed at appeal in 2014. The Inspector considered the proposals would harm the attractive open character and appearance of the area and that there was limited access to local services and facilities. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development. Parsonage Lane and Sparepenny Lane are single track roads which may not be suitable roads to accommodate large scale development and it is not known whether the roads are capable of improvement. This also affects the achievability of the site.
02GtSam15	Rejected	The proposal is for 7 dwellings to be located at the southern end, east of the B1051 with the access being taken from Sparepenny Lane North across the site. The site access is proposed from Sparepenny Lane which is a very narrow single track road and is not considered suitable for additional traffic. It would not be suitable to take access from the main road as it would involve cutting into an embankment to the detriment of the character of the street scene. The

		narrow nature of Sparepenny Lane as an access to the site raises questions as to whether the development is achievable.
01Had15	Rejected	This is a brownfield site located in the countryside between Hadstock and Saffron Walden. The site is not within walking/cycling distance of services and facilities. Development of the site would introduce a new residential estate poorly related to the existing settlement pattern. Outline planning permission for 25-35 houses was dismissed at appeal in June 2015. In the inspector's statement, Para 18 states that whilst the existing buildings are in the open countryside and are clearly visible, 'the structures and activity within it have the look and feel of an agricultural enterprise, albeit a large one'. In relation to potential residential development on the site however, the inspector states that 'The proposed residential development, by reason of its scale and kind, combined with the site's prominence, would appear as an unexpected feature in the landscape; a new settlement that would be poorly related to surrounding development and out of keeping with and harmful to the rural character and appearance of the area.' The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
01HBO15	Rejected	This greenfield site is located in the countryside south of Takeley. About 500m to the south lies an Ancient Woodland and County Wildlife Site. The site is just over 800m to Takeley Crossroads and it would be further to the primary school. The road northwards does not have a pavement along its full extent into Takeley making it unattractive to walking. Development of the site would introduce a built form poorly related to the existing settlement pattern. The site is being proposed for a variety of uses but in all cases the location of this site in the countryside, unrelated to the existing settlements means that it is considered unsuitable as development as it would not contribute to sustainable patterns of development.
02HBO15	Rejected	This brownfield site is located on the edge of Takeley, south of the Flitch Way (County Wildlife Site and linear Country Park). Bonningtons Farmhouse on the site is a listed building. The northern part of the site is well treed and contains a pond. Development of the whole site would introduce an area of built form detrimental to this character. Development of the site is only achievable subject to the cost of demolishing and removing the existing employment buildings and assessing whether there is contamination from the employment uses and undertaking any mitigation measures if needed. (planning permission has been granted for the replacement of existing buildings with two dwellings)
03HBO15	Rejected	This greenfield site is located on the edge of Takeley, south of the Flitch Way (County Wildlife Site and linear Country Park). The site forms part of an extant planning permission for a golf course, hotel, conference centre and indoor leisure facilities. Development of the site would introduce a significant area of built development detrimental to this character. Additional information would be needed to ensure that the development of this site would not lead to harmful effects, especially on highways and on visitor numbers to Hatfield Forest.
04HBO15	Rejected	This site is being proposed as an extension to the site submitted under 03HBO15. The site forms part of an extant planning permission for a golf course, hotel, conference centre and indoor leisure facilities. With access to Takeley being through the site to the east it would be over 800m to the village centre and Roseacres primary school. Development of the site would introduce a significant area of built development detrimental to this character. Development of this site is dependent upon development of 03HBO15.
05HBO15	Rejected	This site is located in the village centre adjacent to the conservation area. A number of the surrounding properties are listed and a large proportion of the site has a tree preservation order. Development of the site would only be achievable subject to the design of the scheme retaining the protected trees and protecting and enhancing the character of the conservation area. The site is too small / the quantum is too low to allocate the site within a strategic Plan
06HBO15	Rejected	There is one tree preservation order on the eastern boundary. The access to the site is from a narrow road which is not considered suitable to access this development. The narrow nature of the frontage road as an access to the site raises questions as to whether the development is achievable.

07HBO16	Rejected	The site lies adjacent to the conservation area. A large proportion of the site along the northern edge lies with flood zone 2. The site is therefore not considered suitable. The achievability of the site is uncertain due to part of the site falling within flood zone 2.
08HBO17	Rejected	The site is located in the B14 Roding Farmland Plateau area of the Landscape Character Assessment, which has a moderate to high sensitivity to change. Barrington Hall Lake local wildlife site and Hatfield Broad Oak Priory Ancient Monument both lie close to the site. A large number of listed buildings can be found in close proximity. The development of this site would extend development into the open countryside and coalesce the village with Water Farm. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
01HHea15	Rejected	This greenfield site is located on the southern side of Sawbridgeworth Road, wholly within the Green Belt and separated from the existing development limits by a small area of heathland. The site forms part of parcel 20 in the Green Belt Review 2016 which was found to have a 'strong' value in meeting the purposes of the Green Belt. The site is therefore considered unsuitable as development on this site would not contribute to sustainable patterns of development.
02HHea15	Rejected	At an appeal into the refusal of 7 dwellings the Inspector concluded that the development and use of the land would erode openness on a site that is open at present, and having mind to the statement in the Framework on the essential characteristics of Green Belts, significant weight attaches to this adverse effect. Two of the purpose of the Green Belt stated in national policy would not be supported. The site forms part of parcel 22 in the Green Belt Review 2016 which was found to have a 'strong' value in meeting the purposes of the Green Belt. The site does contribute to the functions of the Green Belt and therefore development is considered unsuitable.
03HHea15	Rejected	The site forms part of parcel 17 in the Green Belt Review 2016 which was found to have a 'strong' value in meeting the purposes of the Green Belt. The site does contribute to the functions of the Green Belt and therefore development is considered unsuitable.
04HHea15	Rejected	This site lies wholly within the Green Belt. The site forms part of parcel 17 in the Green belt Review 2016 which was found to have a 'strong' value in meeting the purposes of the Green Belt. The whole site does contribute to the functions of the Green Belt and therefore development is considered unsuitable.
05HHea15	Rejected	This is a greenfield site on the northern edge of the village and is located wholly within the Green Belt. The inspector considering an appeal against the refusal of permission for 5 dwellings in 2016 concluded that the proposal would be harmful to the openness of the Green Belt. Development of the site would introduce a significant built form extending into the open countryside. The site forms part of parcel 17 in the Green Belt Review 2016 which was found to have a 'strong' value in meeting the purposes of the Green Belt. The site does contribute to the functions of the Green Belt and therefore development is considered unsuitable.
06HHea15	Rejected	This is a greenfield site and lies wholly within the Green Belt. The site forms part of parcel 22 in the Green Belt Review 2016 which was found to have a 'strong' value in meeting the purposes of the Green Belt. The site does contribute to the functions of the Green Belt and therefore development is considered unsuitable.
07HHea15	Rejected	This is a greenfield site and lies wholly within the Green Belt. The site forms part of parcel 18 in the Green Belt Review 2016 which was found to have a 'strong' value in meeting the purposes of the Green Belt. The site does contribute to the functions of the Green Belt and therefore development is considered unsuitable.
08HHea17	Rejected	This site lies to the east of the A1060 on the north western side of the village and comprises open land, industrial units, yards and storage areas. The property of High Pastures lies within the Development Limits. The remainder of the site lies beyond the development limits and within the Green Belt. The site forms part of parcel 17 in the Green Belt Review 2016 which was found to have a 'strong' value in meeting the purposes of the Green Belt. The site does contribute to the functions of the Green Belt and therefore development is considered unsuitable.

09HHea17	Rejected	This assessment relates to two greenfield sites either side of Mill Lane. The sites lie within the Green Belt. The site forms part of parcel 17 in the Green Belt Review 2016 which was found to have a 'strong' value in meeting the purposes of the Green Belt. The site does contribute to the functions of the Green Belt and therefore development is considered unsuitable.
01Hen15	Rejected	This site comprises the house and extensive garden on Old Mead Lane. Old Mead Lane is an area characterised by ribbon development. The site is located beyond walking and cycling distance from the school and shops in Elsenham and Henham. The development of this site would lead to backland development which is not a characteristic of the area. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
02Hen15	Rejected	There are small areas at risk of surface water flooding. Development has the potential to avoid these but there may be an impact on site access. There are a number of listed buildings in the vicinity of the site. The Historic Settlement Character Assessment considers that development would impact on the historic core of the village and large scale development extending beyond defined landscape features would affect its setting. It is considered that the impact on the historic core of the village does not make this a suitable site for significant development. Evidence submitted by the Parish Council indicates that highway access is not achievable.
03Hen15	Rejected	The site adjoins the conservation area but is some distance from the existing development limits. There are a number of listed buildings in the vicinity. The development of this site would introduce a form of development not related to the existing pattern of development. A planning application for 4 dwellings was refused and dismissed at appeal. The Inspector considered the site to be more closely related to the countryside than the village and development would appear as a form of back land development. The site is therefore considered unsuitable as it would not contribute to a sustainable pattern of development.
04Hen15	Rejected	This is a greenfield site located on the southern edge of the village and adjoins the existing development limits. The Historic Settlement Character Assessment (2007) considers that in this location appropriate residential development could be created that at worst would be neutral and at best would improve the sense of place and local distinctiveness. The site is in close proximity to the village services and the site is well related to the existing development and is therefore considered a suitable site for development. However members voted at the Planning Policy Working Group Meeting to not allocate the site on the basis that a planning application had been rejected by Planning Committee.
05Hen15	Rejected	The Historic Settlement Character Assessment (2007) considers that in this location appropriate residential development could be created that at worst would be neutral and at best would improve the sense of place and local distinctiveness. However it is considered that development of the site would introduce a large housing estate which would link the development at Vernons Close to Mill Pond Nursery, and which appear prominent in the landscape and unrelated to the village. This site is therefore considered an unsuitable site for development.
06Hen15	Rejected	This site is located in the small hamlet of Pledgdon Green which is some distance from Henham or other settlements with facilities. The site is not within walking or cycling distance of services. The site is located on the 57dBA Leq noise contour around the airport. Opposite the site, on the west of the road is a Local Wildlife Site. The development of this site would introduce additional houses which would be reliant on the car to access services and therefore this site is considered unsuitable as it would not contribute to sustainable patterns of development.
07Hen16	Rejected	This site lies on the eastern edge of the village. Part of the site lies within the draft development limits drawn in the Uttlesford Regulation 18 Local Plan 2017. The part of the site which lies within the draft development limits and has been granted planning permission for 9 dwellings however the entirety of the proposal (for 14 dwellings) would result in development beyond the area with planning permission which not considered suitable as it would extend development into more open countryside.

08Hen17	Rejected	This greenfield site lies beyond the development limits. The site is located in the B10 Broxton Farmland Plateau area of the Landscape Character Assessment, which has a moderate to high sensitivity to change. The site lies about 400m north of an ancient monument. There are a large number of listed buildings in the vicinity of the site. Development of the site would introduce significant development to the west of Crow Street, intruding into the open countryside and impacting on the conservation area. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
01HEas15	Rejected	There are a small number of listed buildings to the south of the site and Garnets Wood a SSSI and Ancient Woodland located to the east. The site is remote from settlements with services and facilities and therefore the site is considered unsuitable as development of this site would not contribute to sustainable patterns of development.
02HEas15	Rejected	This greenfield site adjoins the conservation area. There are a number of listed buildings and protected trees on the opposite side of the road. The road frontage to the site contributes to the rural character of the gateway approach into the village with the former Parsonage farm buildings opposite. High Easter is a small type B village with few services and only a limited bus service. The site is not considered suitable for development because of the lack of services and facilities in the village and the potential impact of development on the rural character of the approach road and the conservation area.
01HRod15	Preferred	Planning permission has been granted for this site.
02HRod15	Rejected	This is a large greenfield site located to the north east of the village adjacent to the conservation area. There are a number of listed buildings in the vicinity of the site. High Roding is a Type B village with limited facilities and a limited bus service resulting in a reliance on the car. The northern end of the village is characterised by loose knit development. The development of this site would introduce a significant amount of housing in a village with limited services. The site is therefore considered unsuitable as development on this site would not contribute to sustainable patterns of development.
03HRod15	Rejected	This is a large greenfield site located to the north east of the village adjacent to the conservation area. It is part of the larger site being promoted under SLAA reference 02HRod15. There are a number of listed buildings in the vicinity of the site. High Roding is a Type B village with limited facilities and a limited bus service resulting in a reliance on the car. The northern end of the village is characterised by loose knit development. The development of this site would introduce a significant amount of housing in a village with limited services. The site is therefore considered unsuitable as development on this site would not contribute to sustainable patterns of development.
04HRod16	Rejected	The site lies within a small area of 1 in 1000 flood risk to the north of the site in relation to surface water flooding. This covers less than 25% of the site. The site is within the High Roding Conservation Area and is Grade 2 agricultural land. High Roding is a Type B village with limited services and facilities. The site is not considered suitable for development as it would result in the loss of village allotments.
01Lan15	Rejected	There are a number of listed buildings adjacent to the site. Park Lane running north from the village is a protected lane. There is no development limit for the hamlet. There are limited services and facilities in the hamlet and a limited bus service. This site is therefore considered unsuitable as development on this site would not contribute to sustainable patterns of development.
02Lan15	Rejected	Upper Green Road running south from the village is a protected lane. There is a listed building adjacent to the south of the site. There is no development limit for the village. There are limited services and facilities in the village and a limited bus service. This site is therefore considered unsuitable as development on this site would not contribute to sustainable patterns of development.
03Lan15	Rejected	Upper Green Road running south from the village is a protected lane. There are a number of listed buildings in the vicinity of the site. There is no development limit for the village. There are limited services and facilities in the village and a limited bus service. This site is therefore considered unsuitable as development on this site would not contribute to sustainable patterns of development.

01LRod15	Rejected	This greenfield site lies wholly within the Green Belt and is separated from the development limits by the village hall. However development of the site is considered unsuitable as it would create a ribbon of development closing the gap between the edge of the village and Leaden Hall Farm which would not contribute to a sustainable pattern of development. Furthermore the site forms part of parcel 25 in the Green Belt Review 2016 which was found to have a 'strong' value in meeting the purposes of the Green Belt. The site does contribute to the functions of the Green Belt and therefore development is considered unsuitable.
02LRod15	Rejected	This site is located wholly within the Green Belt. The site forms part of parcel 27 in the Green Belt Review 2016 which was found to have a 'strong' value in meeting the purposes of the Green Belt. The site does contribute to the functions of the Green Belt and therefore development is considered unsuitable.
03LRod15	Rejected	This site is located wholly within the Green Belt. The site forms part of parcel 27 in the Green Belt Review 2016 which was found to have a 'strong' value in meeting the purposes of the Green Belt. The site does contribute to the functions of the Green Belt and therefore development is considered unsuitable.
04LRod15	Rejected	This site is located wholly within the Green Belt. The site forms part of parcel 27 in the Green Belt Review 2016 which was found to have a 'strong' value in meeting the purposes of the Green Belt. The site does contribute to the functions of the Green Belt and therefore development is considered unsuitable.
05LRod15	Rejected	This site is located wholly within the Green Belt. The site forms part of parcel 27 in the Green Belt Review 2016 which was found to have a 'strong' value in meeting the purposes of the Green Belt. The site does contribute to the functions of the Green Belt and therefore development is considered unsuitable.
01Lin15	Rejected	This is a greenfield site in the hamlet of Lindsell. Lindsell is not defined by development limits in the current adopted Local Plan. There are very limited services and facilities in the hamlet and residents need to travel by car to nearby settlements for schools and shops etc. This site is considered unsuitable for development as development on this site would not contribute to sustainable patterns of development.
02Lin15	Rejected	This is a greenfield site in the hamlet of Lindsell. Lindsell is not defined by development limits in the current adopted Local Plan. There are very limited services and facilities in the hamlet and residents need to travel by car to nearby settlements for schools and shops etc. This site is considered unsuitable for development as development on this site would not contribute to sustainable patterns of development.
03Lin15	Rejected	This is a greenfield site in the hamlet of Lindsell. Lindsell is not defined by development limits in the current adopted Local Plan. There are very limited services and facilities in the hamlet and residents need to travel by car to nearby settlements for schools and shops etc. This site is considered unsuitable for development as development on this site would not contribute to sustainable patterns of development.
04Lin15	Rejected	This is a greenfield site in the hamlet of Lindsell. Lindsell is not defined by development limits in the current adopted Local Plan. There are very limited services and facilities in the hamlet and residents need to travel by car to nearby settlements for schools and shops etc. This site is considered unsuitable for development as development on this site would not contribute to sustainable patterns of development.
01LtCan15	Rejected	The site lies within the Countryside Protection Zone and does not adjoin the existing development limits. The site forms part of parcel 5 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a high level of harm to the purposes of the CPZ. The site includes a listed building at the eastern end but development is proposed on the grazing land to the west. The dwelling adjoining the west of the site is listed. The site is not considered suitable as development on the site would not contribute to sustainable patterns of development.
03LtCan15	Rejected	The site is separated from Great Dunmow by the A120. Although services and facilities in and on the western side of Great Dunmow would be close by, one would need to cross the A120 to access them which would not be conducive on foot or by cycle. The site relates more to its countryside location. The site is therefore considered unsuitable for residential development on this site as it would not contribute to sustainable patterns of Development.
05LtCan15	Rejected	This greenfield site lies within the Countryside Protection Zone. Warren Farm to the east is a listed building. The site forms part of parcel 5 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a high level of harm to the purposes of the CPZ. The development of this site would breach that strong boundary and start to

		consolidate the sporadic development along the B1256.
06LtCan15	Rejected	This greenfield site lies within the Countryside Protection Zone adjacent to the development limits and is submitted as a Gypsy and Traveller accommodation site. Warren Farm to the east is a listed building. The western edge of the site is currently a very defensible boundary to the development of Priors Green. The development of this site would breach that strong boundary and start to consolidate the sporadic development along the B1256.
07LtCan15	Rejected	This greenfield site lies within the Countryside Protection Zone. Warren Farm, which this site wraps around, is a listed building. The site forms part of parcel 5 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a high level of harm to the purposes of the CPZ. The development of this site would breach that strong boundary and start to consolidate the sporadic development along the B1256.
08LtCan15	Rejected	This greenfield is being proposed for employment uses. It is situated to rear of existing employment land and has access to the A120 both east and west bound. It is on the outskirts of Great Dunmow but separated from the town by the A120. The northern edge of the site abuts the Flitch Way and any development would need to include a buffer to protect this Local Wildlife Site and linear country park. This site is considered to be less well related to the highway network than 09LtCan15.
09LtCan15	Preferred	This greenfield is being proposed for employment uses. It is situated south of the junction on to the A120 with access both east and west bound; and north of an existing established employment site. It is on the outskirts of Great Dunmow but separated from the town by the A120. The southern edge of the site abuts the Flitch Way and there are three listed buildings adjoining the site. Any development would need to include a buffer to protect the Local Wildlife Site / linear country park and the listed buildings. 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 development of the site for employment purposes is considered suitable.
10LtCan15	Rejected	The eastern edge of the site adjoins the River Roding and a small portion of the site lies within the floodplain. The southern edge of the site abuts the Flitch Way. A small number of listed buildings adjoin the site and there is a small area of protected trees on the north eastern boundary. The site forms part of parcel 5 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a high level of harm to the purposes of the CPZ. The development of this site would breach that strong boundary and start to consolidate the sporadic development along the B1256.
11LtCan15	Rejected	The southern edge of the site abuts the Flitch Way. A small number of listed buildings adjoin the site. Parts of the site are over 800m from the school and shops. The site forms part of parcel 5 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a high level of harm to the purposes of the CPZ. The development of this site would breach that strong boundary and start to consolidate the sporadic development along the B1256.
01LtChe15	Preferred	The site is a current Research Park with an approved masterplan for expansion.
02LtChe15	Rejected	This part brownfield part greenfield site is located south of Little Chesterford village and does not adjoin a development limits. The access ways into the site and a small area of the south western corner of the site lie within flood zones 2 and 3. The B183 in this location has special verge which is recognised as a County Wildlife Site. There are 3 listed buildings near the site. The site is not close to any village services so residents would be reliant on a car to access service. A recent appeal decision did not consider this a sustainable location. (UTT/13/3095/OP APP/C1570/A/14/2226566) with particular regard to community facilities and transport opportunities. The site is therefore considered unsuitable as development on this site would not contribute to sustainable patterns of development.
03LtChe15	Rejected	The site is over 800m from the services and facilities in the village centre. The land to the north east of the site lies within flood zone 2 and 3. The site is within the A1 Cam River Valley category of the Landscape Character Assessment which has a relatively high sensitivity to change. The site lies partly within

		Sector 4 - Newmarket Road approach from the south east of the Great Chesterford Historic Settlement Character Assessment. The principal effect of development would be to extend the village beyond its clearly defined landscape edge detrimentally affecting the setting of the village as a whole. It is considered that development in this sector would diminish the sense of place and local distinctiveness of the settlement. The development of the site is considered unsuitable because the southern edge of the village currently forms a strong defensible boundary to development and development of this site would extend development south-westwards along the valley.
04LtChe15	Rejected	The site is over 800m from the services and facilities in the village. The site is within the A1 Cam River Valley category of the Landscape Character Assessment. It has a relatively high sensitivity to change. The site lies partly within Sector 4 - Newmarket Road approach from the south east of the Great Chesterford Historic Settlement Character Assessment. The principal effect of development would be to extend the village beyond its clearly defined landscape edge detrimentally affecting the setting of the village as a whole. It is considered that development in this sector would diminish the sense of place and local distinctiveness of the settlement. The development of the site is considered unsuitable because the southern edge of the village currently forms a strong defensible boundary to development and development of this site would extend development south-westwards along the valley.
05LtChe15	Rejected	This small site lies on the edge of the village and is accessed via a single width track. Little Chesterford is not defined by an adopted Development Limit. Little Chesterford is a small village with limited services and facilities. This site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
06LtChe15	Rejected	The site plan does not show the site as having any road frontage but the form states that access is proposed from Walden Road. Little Chesterford is a small village with very limited services and facilities. This site is considered unsuitable and development of the site would not lead to a sustainable pattern of development.
01LtEas15	Rejected	Little Easton has very limited facilities and the site is not within walking/cycling distance of schools or shops. The development of this site would introduce a ribbon of development out of character of the lane. In the appeal against the refusal of planning permission for 3 dwellings, the inspector concluded that the proposed development would amount to an intrusive and thus unacceptable form of development, which would be harmful to the character and appearance of the site and the surrounding area. This site is therefore considered unsuitable as development on this site would not contribute to sustainable patterns of development.
02LtEas15	Rejected	This greenfield site is located to the east of Little Easton and the site does not adjoin existing development limits. The property to the east is listed. The majority of the site lies within flood zones 2 and 3. Little Easton has very limited facilities and the site is not within walking/cycling distance of schools or shops. The development of this site would introduce the built form of a small residential estate, unrelated to the character of the area and consolidating the existing sporadic development. The site is therefore considered unsuitable as development on this site would not contribute to sustainable patterns of development. It is not considered that development of the site is achievable due to its location within flood zones 2 and 3.
03LtEas15	Rejected	A tree preservation order adjoins the east of the site and a listed building to the west of the site. Land to the east of the site lies within flood zones 2 and 3 but they do not extend into the site. Little Easton has very limited facilities and the site is not within walking/cycling distance of schools or shops. Development of this site would introduce a significant scale of development in a small village with minimal services. The development of the site would have a visual impact on the character of the Upper Chelmer River Valley. The site is therefore considered unsuitable as development on this site would not contribute to sustainable patterns of development.
04LtEas15	Rejected	South of the site lies the ancient woodland of Hoglands Wood and another ancient woodland lies on the opposite side of Woodside Way. Land east of Woodside Way has planning permission for housing, as does land to the south of the site, south of Hoglands Wood. The land to the west of the site was dismissed on appeal for 600-700 dwellings (UTT/13/1043/OP). The development of this site would introduce development to the west of Woodside way unrelated to the pattern of development. It does not relate to the development site to the south as it is separated from it by Hoglands Wood.

05LtEas15	Rejected	The Ancient Woodland Hoglands Wood lies within the site. To the north west the site adjoins the Little Easton conservation area and there are a number of listed buildings along the northern boundary. High Wood to the south west of the site is an SSSI. The proposal includes the provision of services and facilities within the development. The land to the east of the site was dismissed on appeal for 600-700 dwellings (UTT/13/1043/OP). The main grounds that the application was refused were that the application site was divorced and isolated from Great Dunmow, is in the open countryside and would be visually intrusive, proposed access onto the A120 provides a poor and unacceptable means of access into the application site and loss of high quality agricultural land. Development of the site would lead to coalescence of Great Dunmow and Easton Park Garden Community.
01LtHal15	Rejected	This is a large greenfield site to the west of Little Hallingbury. The site lies within the Green Belt. The site forms part of parcel 13 in the Green Belt Review 2016 which was found to have a 'strong' value in meeting the purposes of the Green Belt. This site is therefore considered unsuitable as the site does contribute to the functions of the Green Belt and development on this site would not contribute to sustainable patterns of development.
02LtHal15	Rejected	This is a large greenfield site wholly within the Green Belt. The site forms part of parcel 14 in the Green Belt Review 2016 which was found to have a 'strong' value in meeting the purposes of the Green Belt. The site does contribute to the functions of the Green Belt and therefore development is considered unsuitable.
03LtHal15	Rejected	The site lies wholly within the Green Belt. The site forms part of parcel 14 in the Green Belt Review 2016 which was found to have a 'strong' value in meeting the purposes of the Green Belt. The site does contribute to the functions of the Green Belt and therefore development is considered unsuitable.
04LtHal15	Rejected	The site is wholly within the Green Belt. The site forms part of parcel 13 in the Green Belt Review 2016 which was found to have a 'strong' value in meeting the purposes of the Green Belt. The site does contribute to the functions of the Green Belt and therefore development is considered unsuitable.
01LtWal15	Rejected	This is small greenfield site located about 1km south of Little Walden. The western boundary of the site is adjacent to flood zones 2 and 3. There are Ancient woodlands to the east and west. This site is in an isolated location, not well related to existing settlements and some distance from services and facilities. Therefore the site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
02LtWal15	Rejected	The western end of the site falls within flood zones 2 and 3. There is a Tree Preservation Order (TPO) on southern boundary and other TPOs in vicinity of the site. Little Walden has very limited facilities and looks to Saffron Walden and Linton for services and facilities. Little Walden is not considered a sustainable location for development. Development of the site is achievable subject to development avoiding the area within flood zones 2 and 3.
03LtWal15	Rejected	The land on other side of the road lies within flood zones 2 and 3. To the north are the listed buildings of Hall Farm. There are Tree Preservation Orders (TPO) on northern boundary of the site and other TPOs in the vicinity. Little Walden has very limited facilities and looks to Saffron Walden and Linton for services and facilities. Little Walden is not considered a sustainable location for development.
01Lit15	Rejected	This brownfield site is separated from the development limits by a single dwelling and its garden. There is a Tree Preservation Order (TPO) on the southern edge of the site and there are other TPOs in the vicinity of the site. A listed building adjoins the site. Land to the east of the site lies within flood zones 2 and 3. Littlebury has limited services. The redevelopment of the site would result in businesses needing to relocate, potentially out of the village. Littlebury is not considered a sustainable location for significant development.
02Lit17	Rejected	This is a greenfield site located on the northern edge of the village. The conservation area and a number of listed buildings are located to the south of the site. Littlebury is a type B village and has limited services and is served by a limited bus service. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
01Man15	Rejected	This greenfield site lies at the southern end of the village and is separated from the development limits by Cock Farm. The northern edge of the site lies within the conservation area. There a number of listed buildings in the vicinity of the site. This site provides important visual separation between the edge of the village conservation area and the group of dwellings at the southern end of the site. The open nature of the site affords especially fine views across the Stort Valley and these broad views would be significantly diminished by the development of the site. In the appeal against the refusal of permission for 12

		<p>dwellings the inspector concluded that the development would have a harmful effect on the character and appearance of the landscape and conservation area (Para 12). The site is therefore considered unsuitable as development on this site would not contribute to sustainable patterns of development.</p>
02Man16	Rejected	<p>This greenfield site lies to the north of the village, adjacent to the conservation area. The road frontage where the access is proposed has a high risk from surface water flooding. The site is within the A3 Stort River Valley category of the Landscape Character Assessment. It has a relatively high sensitivity to change. The site lies above the road and development would have a significant impact on the countryside character of the approach to the village. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.</p>
03Man16	Rejected	<p>This greenfield site lies to the south of the village, beyond the village development limits. The site adjoins listed buildings and the conservation area to the north. The development of this site would introduce development unrelated to the existing settlement pattern. The site is therefore considered unsuitable and development of the site would not lead to a sustainable pattern of development.</p>
01New15	Rejected	<p>This greenfield site lies to the east of the village, separated from the village and the development limits by the railway line. There is a Special Verge/Local Wildlife site along the road frontage of the site. The site is more related to its countryside setting than to the village of Newport. The appeal into refusal of permission for residential development examined three separate planning appeals, all of which the inspector deemed 'would introduce built development which, to varying degrees, would be materially harmful to the rural character of this part of the countryside'. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.</p>
02New15	Preferred	<p>This site comprising a house and garden is at the southern end of the village adjoining the village development limits and proposes the redevelopment of the site for 5-11 houses. The site has been granted planning permission for 11 dwellings.</p>
03New15	Rejected	<p>This greenfield site is located at the south of the village and wraps around site reference 02New15 which has permission for 11 dwellings. It is separated from the adopted development limits by some residential development but adjoins the draft development limits in the emerging Local Plan. Newport is a key village and has a number of services and facilities. This site is well related to the village and along with site 02New15 is considered a suitable site for development. Notwithstanding this an executive decision was made by Members (Council 19 June 2018) to attach specific weight to the extension of the ribbon development and the site is considered unsuitable.</p>
04New15	Rejected	<p>The site has blocks of trees on its northern and southern boundary and in the middle of the site. To the north of this the high visibility of these slopes and the effect of marring views of the important church tower would be highly detrimental. The suitability of this site is affected by the impact of development on the landscape and the highways impact.</p>
05New15	Rejected	<p>The site adjoins the conservation area in the south east corner of site. Land to the north beyond the site is a County Wildlife Site and is within Flood zones 2 and 3. There are a number of Tree Preservation Orders close to the site. The Historic Settlement Character Assessment (2007) considers that the effect of development of this site would have a detrimental impact on the adjacent conservation area and its relationship with the farmland, affecting important views including those of the church. The development of the site would extend development into the open countryside and the river valley. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.</p>
06New15	Preferred	<p>Planning permission has been granted on this site for 94 dwellings</p>
07New15	Rejected	<p>The site north of Wicken Water is a Local Wildlife Site – Wicken Water Marsh designated in 2007. The site touches the conservation area at its eastern end. The majority of the site lies within Flood Zones 2 and 3 with only a small portion fronting Bury Water Lane, and along the southern edge of the site lying beyond. The proposal is to develop in the areas beyond the flood zones 2 and 3 with the remainder of the site being open space. This site comprising of reedbed and wet woodland which are biodiversity action plan habitats is therefore considered an unsuitable site for development.</p>

08New15	Preferred	The site has planning permission for a retirement village (UTT/17/1561/DFO)
09New15	Rejected	This site is located on the northern edge of the village. The site is not adjacent to the adopted development limits. Newport is a key village and has a number of services and facilities. The site has planning permission for 2 dwellings. The site is considered suitable for small scale development. The site is too small / the quantum is too low to allocate the site within a strategic Plan.
10New15	Preferred	This greenfield site lies on the northern edge of the village. The site is allocated for residential development and benefits from planning permission for 20 dwellings.
11New15	Rejected	This site comprising school playing pitches is located at the northern end of the school site. It does not adjoin the village development limits. The development of this site would introduce significant backland development on a site bordering the open countryside. The site is therefore considered unsuitable because of the loss of playing fields and that development on this site would not contribute to sustainable patterns of development.
12New15	Rejected	This site is located adjacent to the conservation area. There are a number of listed buildings opposite the site. There is a TPO in south western corner of site and other TPO in the vicinity. The school is on a split site either side of Bury Water Lane and this site is located in the middle of the school site and there are concerns about the juxtaposition of the two land uses. Concerns are raised over the suitability of this site because of how the residential development can be designed to fit within the school site, loss of playing fields, loss of parking, ground level differences as well as impact from railway noise on the site.
13New15	Rejected	The site is accessed via a narrow road from Debden Road. Newport is a key village with a range of services and facilities but the site is some distance from the village in an isolated location. The allocation of the site would introduce development in an isolated location in the countryside. The site is therefore considered unsuitable for residential or employment development as development on this site would not contribute to sustainable development.
01Que15	Rejected	This site lies at the northern edge of Quendon. Quendon does not have development limits. It lies within the conservation area and there is a listed building adjacent to the access point to the site. There are other listed buildings nearby along Cambridge Road. The site is slightly higher than the properties along the road and to the rear of the site is a treed area. The development of this site would introduce backland development in an area characterised by ribbon development fronting Cambridge Road which may have a detrimental impact on the conservation area and nearby listed buildings. The site is therefore not considered suitable because development of the site would not contribute to sustainable patterns of development.
02Que15	Preferred	This greenfield site is located in the centre of Rickling Green. The site adjoins the adopted development limits. The site is in easy walking distance of the primary school. Land to the south of the site has been granted permission for residential development and construction commenced in 2015. The site is sandwiched between developments and is considered a suitable site for development.
03Que15	Preferred	This site has been granted planning permission for 12 dwellings
04Que15	Rejected	This greenfield site lies on the eastern side of Quendon. Quendon does not have development limits. The western part of the site lies within the conservation area. There are a number of listed building adjacent to the site, particularly the parish Church (Grade II*) to the north and The Old Rectory to the south. There are other listed buildings nearby along Cambridge Road. There is an avenue of trees running through the middle of the site which contains graves. The site is slightly higher than the properties along the road. The development of this site would introduce backland development in an area characterised by ribbon development fronting Cambridge Road which may have a detrimental impact on the conservation area and nearby listed buildings. The site is therefore not considered suitable because development of the site would not contribute to sustainable patterns of development.
05Que15	Rejected	This greenfield site lies at the norther edge of Quendon. Quendon does not have development limits. The site lies adjacent to the conservation area. There are a number of listed building adjacent to the site, particularly the parish Church (Grade II*) to the south. The site is slightly higher than the properties along

		the road. The development of this site would introduce backland development in an area characterised by ribbon development fronting Cambridge Road which may have a detrimental impact on the conservation area and nearby listed buildings. The site is therefore not considered suitable because development of the site would not contribute to sustainable patterns of development.
06Que15	Rejected	This greenfield site lies on the western side of Quendon. Quendon does not have development limits. The site lies adjacent to the conservation area. There are two listed buildings to the south east of the site between the site and the road. There are other listed buildings nearby along Cambridge Road. The development of this site would introduce backland development in an area characterised by ribbon development fronting Cambridge Road which may have a detrimental impact on the conservation area and nearby listed buildings. The site is therefore not considered suitable because development of the site would not contribute to sustainable patterns of development.
07Que17	Rejected	The site is within 1km of five ancient woodland and four local wildlife sites, the nearest being Coney Acre Wood. There are a number of listed buildings in the vicinity. The site is seen to relate more to the countryside than to the village and is therefore considered unsuitable for housing.
08Que17	Rejected	This site lies adjacent to the conservation area. The site is sandwiched between the village and the B1383 but extends southwards into the countryside. The site is to the west of Quendon Wood SSSI and a number of Ancient woodland/local wildlife sites are within 1km of the site. There are 2 listed buildings close to the site. The development of this site would extend development into the countryside and be of an inappropriate scale to the village. The site is therefore considered unsuitable as development on the site would not contribute to sustainable patterns of development.
01Rad15	Rejected	The site is some distance from the village development limit which is drawn around the main part of the village to the west. The public house opposite the site is a listed building. The site is identified as a Local Wildlife Site known as 'Plough Meadow' – identified for its chalk habitat. The site is located at the end of a ribbon development where there is the transition between village and countryside. The development of this site would introduce an area of significant built development in this area of loose knit sporadic development and it would involve the loss of a local Wildlife Site. Development of the site is therefore considered unsuitable.
02Rad15	Rejected	This greenfield site lies on the eastern edge of the village. It does not adjoin the village development limits which are drawn around the main part of the village to the west. The western edge of the site lies within flood zones 2 and 3 and is not being proposed for development. Development along Plough Hill is mainly on the northern side of the road. The development of this site would introduce an area of significant development on the southern side of the B1054, unrelated to the existing pattern of development and which would significantly affect the countryside character of the area.
01Saf15	Rejected	The site is too small / the quantum is too low to allocate the site within a strategic Plan. The site has planning permission for 1 dwelling
02Saf15		The site is too small / the quantum is too low to allocate the site within a strategic Plan. The site has planning permission for 5 dwelling
03Saf15	Preferred	This greenfield site lies outside the adopted development limits. This triangular site is bounded by residential development on one side and commercial development which has residential permission on another side. The site is well related to the development and does not intrude into the open countryside. The site is considered suitable for development.
04Saf15	Preferred	This brownfield site lies on the south eastern edge of the village. It adjoins the adopted town development limits. The site is sandwiched between residential development and the recently developed retail store. The principle of development has been accepted on this site with the permission for the Heritage Centre (now lapsed). The site is considered suitable for development.
	Preferred (Development Opportunity)	This brownfield site lies within the town development limits, in the town centre, and within the conservation area. The site is considered suitable for development. The site is identified as a development opportunity site for town centre uses.

05Saf15	Site)	
06Saf15	Rejected	Trees on the Ashdon road frontage of the site are subject to a Tree Preservation Order. In the Adopted Local Plan and the 2017 Regulation 18 Local Plan the site is identified as open space of environmental value. Although the site is not publically accessible it does contribute to the local environment and is not considered suitable for development.
07Saf15	Preferred (part – land north east of Thaxted Road)	This greenfield site lies on the south eastern edge of the town. The proposal involves the land to the east of Thaxted road being development for residential development and leisure uses on land to the west. The site adjoins the adopted town development limits. Where the site fronts Thaxted Road, it adjoins land within Flood zones 2 and 3. Planning permission for the residential development of the site was dismissed on appeal. The Inspector concluded that the proposed development would not have a significant adverse effect on the character of the area. On highways he concluded that application failed to demonstrate that the development would not adversely affect congestion within the town. Therefore he considered that development would have an adverse effect on the efficient operation the local highway network. He states that there would not be a material adverse effect on air quality in the town. He placed very little weight on the loss of best and versatile agricultural land. He considered that the proposal would not have a detrimental impact on the local infrastructure and services. It is considered that the site is suitable for development subject to being able to demonstrate that there would be no adverse effect on the efficient operation of the local highway network. Local Plan evidence suggests that a development of 150 dwellings would have no adverse effect on the efficient operation of the local highway network and therefore a smaller site to the north east of Thaxted Road is considered suitable for development.
08Saf15	Rejected	The site boundary only adjoins the adopted town development limits for one short length where the site abuts Ozier Court. Otherwise the site is separate from the Town Development Limits by the land proposed for leisure uses under site reference 07Saf15. There is a listed building at Herberts Farm to the east of the site. Between Thaxted Road and Debden Road there is a clearly defined edge to the town and the development of this site would breach this edge. On its own the site is not considered suitable because the development of the site would introduce a scale of development unrelated to the existing pattern of development.
09Saf15	Rejected	The Historic Settlement Character Assessment for this area considers that development in the location would spill urban development down a visually prominent slope onto rolling arable farmland of considerable visual quality. The existing development is on the brow of the hill and development of this site would introduce development on the visually prominent valley side. The site is therefore considered unsuitable as development on this site would not contribute to sustainable patterns of development.
10Saf15	Preferred	The site has planning permission for 85 dwellings.
11Saf15	Rejected	The site adjoins the adopted development limits. The site was allocated, as part of a larger site, for development in the 2014 submission Local Plan (subsequently withdrawn). The Local Plan Inspector considered that in strategic terms this is a sound allocation. Land to the north has planning permission for residential development incorporating land for a primary school. Land to the south (07Saf15) is also allocated for development in the Local Plan. Primary access to the site is proposed through the development to the north. This site, as part of a larger development including land to the south (07Saf15) would assist in the provision of a link road between Radwinter Road and Thaxted Road; and land for further provision of primary education. Local Plan evidence suggests that a development of 150 dwellings would have no adverse effect on the efficient operation of the local highway network and therefore a smaller site to the north east of Thaxted Road is considered suitable for development (07Saf15) It is considered that the addition of this site would not be suitable for development as evidence has not been able to demonstrate that there would be no adverse effect on the efficient operation of the local highway network and air quality.
12Saf15	Preferred	Planning permission has been granted for 31 dwellings.

13Saf15	Preferred	This brownfield site is located on the north eastern edge of the town. The site lies within the town development limits. The use of the site as a coach depot is not the most suitable use, located in the historic core of the town. The redevelopment of this site would enable the use to relocate to a more suitable location. The site is therefore considered suitable for residential development and was allocated for development in the Local Plan
14Saf15	Rejected	There are a number of listed buildings in the vicinity of the site in Freshwell Street, Myddylton Place and Park Lane. Although the proposal suggests that land on the eastern side of the site lies outside flood zones 2 and 3, Council records show that the whole of the site lies within flood zones. The site is therefore not considered suitable for development. Development of the site is not considered achievable due to its location within flood zones 2 and 3.
15Saf15	Rejected	To the south of the site lies the historic garden of Bridge End Gardens. To the west of the site lies the historic parkland of Audley End. There is a listed building to the north of the site at The Vineyard and to the south at Bridge End. The site includes an area of well used allotments. The Historic Settlement Character Assessment 2007 states that Development in this location would have a seriously detrimental effect on the historic core which is immediately adjacent to the south. The effect of development would result in loss of well used allotments or woodlands and spill up the slope destroying an enclosed approach road of great quality. The proposal retains the allotments but not necessarily in the same location within the site. The development of this site would have a detrimental impact on the historic core of the town. The site is therefore considered unsuitable as development on this site would not contribute to sustainable patterns of development
16Saf16	Preferred	The site is located within the town, east of Thaxted Road. The site is part of a larger site proposed in the 2005 Local Plan for residential development. The remaining parcels have been developed for residential purposes. The development of the site would remove an industrial use from a residential area. The site is within walking distance of the town centre and is considered a sustainable location for residential development.
17Saf16	Preferred	This site is located on the south eastern edge of Saffron Walden. The site is currently vacant but has planning permission for retail warehousing. The site adjoins existing retail and employment uses and is therefore considered suitable for employment uses.
18Saf16	Rejected	A viability assessment (Carter Jonas, 2012) of the site considers that due to the rateable value of the current premises it would take a particularly valuable scheme to justify redevelopment. The availability of the site is not known.
19Saf16	Rejected	A viability assessment (Carter Jonas, 2012) of the site concluded that 'a mixed use development providing ground floor retail with an alternative town centre use at the rear with upper floor residential accommodation will be viable, though would require careful design to protect the amenity of any residential units. No scheme is likely to come forward until such time as the Fire Service and/or laundry have a need to relocate to new premises.' The availability of the site is not known.
20Saf17	Rejected	This brownfield site lies within the town development limits and is vacant employment buildings. The site lies within the Saffron Walden Air Quality Management Area and traffic from the site would drive through the AQMA. Saffron Walden's Historic Settlement Character Assessment indicates that the site is located within an area that includes important elements in the character of the historic core, such as a wealth and variety of architectural detailing and important open spaces. This is currently an unattractive building within a residential area which would benefit from redevelopment however the suitability of the site is dependent impact on highways and air quality and loss of employment land.
01Sew15	Rejected	The development of this site would introduce a significant scale of development in a small village with limited facilities. The development would also have an impact on the highway network in Saffron Walden. The development of this site would extend development of the village into open countryside. The development of the site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
02Sew15	Rejected	There is a listed building on the opposite side of the road to the site and 3 other listed buildings in the vicinity of the site. The development of this site would introduce a significant scale of development in a small village with limited facilities. The development would also have an impact on the highway network in Saffron Walden. Due to the lack of services, Swards End is not considered a sustainable location for development.

03Sew15	Rejected	The development of this site would introduce a significant scale of development in a small village with limited facilities. The development would also have an impact on the highway network in Saffron Walden. The development of the site is considered unsuitable as development on this site would not contribute to sustainable patterns of development. The site is not considered available for development; although it has been promoted through the Call for Sites process no evidence has been submitted of the details of the landowners and their agreement to the development of the site.
04Sew15	N/A	The site has planning permission for 3 dwellings.
05Sew15	Rejected	The development of this site would introduce a significant scale of development in a small village with limited facilities. The development would also have an impact on the highway network in Saffron Walden. The development of this site would extend development of the village into open countryside. The Appeal against the refusal of planning permission for 36 was dismissed on the grounds that the proposals would have an unacceptable impact on the landscape, is out of scale/ not in keeping with the village and is poorly related to everyday services and facilities. The development of the site is therefore considered unsuitable as development on this site would not contribute to sustainable patterns of development.
06Sew15	Rejected	The development of this site would introduce a significant scale of development in a small village with limited facilities. The development would also have an impact on the highway network in Saffron Walden. There is currently a firm western edge to the village identified by hedgerow trees and although development has been permitted beyond the adopted development limits in the vicinity of this site it has not extended beyond this village edge. The development of this site would introduce development beyond this boundary and into the open countryside spilling over into the valley side. In the appeal decision 2017 the inspector concluded that development would have an unacceptably harmful effect on the character and appearance of the area, and does not represent sustainable development. The development of the site is therefore considered unsuitable as development on this site would not contribute to sustainable patterns of development.
07Sew15	Rejected	There are a small number of listed buildings in the vicinity of the site. Swards End is a small village with limited facilities. The development of this site would introduce a significant scale of development in a small village with limited facilities. The development would also have an impact on the highway network in Saffron Walden. The development of this site would extend development of the village into open countryside. The development of the site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
01Sta15	Rejected	This site lies in a small hamlet within the Countryside Protection Zone. The site forms part of parcel 9 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a moderate level of harm to the purposes of the CPZ. Trees within the site are subject to a preservation order. There is a listed building opposite the site and others in the vicinity. The north western corner of the site is within the poor air quality zone from the M11. Burton Bower is a small hamlet with no facilities and no bus service. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
02Sta15	Rejected	This site lies wholly within the Green Belt. The site forms part of parcel 5 in the Green Belt Review 2016 which was found to have a 'moderate' value in meeting the purposes of the Green Belt. The site does contribute to the functions of the Green Belt and therefore development is considered unsuitable.
03Sta15	Rejected	The site is within the Green Belt. The site forms part of parcel 8 in the Green Belt Review 2016 which was found to have a 'strong' value in meeting the purposes of the Green Belt. The site does contribute to the functions of the Green Belt and therefore development is considered unsuitable.
04Sta15	Rejected	The site is within the Green Belt. The site forms part of parcel 8 in the Green Belt Review 2016 which was found to have a 'strong' value in meeting the purposes of the Green Belt. The site does contribute to the functions of the Green Belt and therefore development is considered unsuitable.

05Sta15	Rejected	The site is within the Green Belt. The site forms part of parcel 8 in the Green Belt Review 2016 which was found to have a 'strong' value in meeting the purposes of the Green Belt. The site does contribute to the functions of the Green Belt and therefore development is considered unsuitable.
06Sta15	Rejected	This greenfield site is located in the open countryside some distance from the development limits of the village. There is an ancient woodland/Local wildlife site to the east of the site and woodland to the south is a county wildlife site. There a number of listed buildings in the vicinity of the site. The site is beyond the accepted walking/cycling distance to the services and facilities in Stansted Mountfitchet. Alsa Street and Snakes Lane are narrow single track lanes characterised by isolated dwellings set in large grounds and the development of this site would introduce higher density development in the countryside, unrelated to the village and distant from its services and facilities. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
07Sta15	Rejected	Pennington Lane running north is a protected lane. The site was subject to an application (UTT/13/1203/OP) for 140 dwellings, primary school and recreational space which was refused and dismissed on appeal. The Inspector concluded that the scheme would harm the countryside north of Bentfield Green. Similarly the Inspector concluded that the development would harm the character of the Conservation Area which was characterised by this edge of settlement rural location. This proposal is for a smaller scale development which moves the development away from the conservation area and the traffic would use Rainsford Road. The suitability of this site is subject to evidence that the local highway network has capacity.
08Sta15	Rejected	This site lies wholly within the Green Belt. The site forms part of parcel 5 in the Green Belt Review 2016 which was found to have a 'moderate' value in meeting the purposes of the Green Belt. The site does contribute to the functions of the Green Belt is therefore development is considered unsuitable.
09Sta15	Preferred	The Historic Settlement Character Assessment notes that the northern boundary of the Church provides a clear break with the open countryside adjacent to the north which slopes down to the apex of this triangular plot defined by the B184 on its eastern boundary and High Lane to the west. For the most part these boundaries screen this site with prominent deciduous trees that form strong hedgerows. This is considered a suitable site for development.
10Sta15	Rejected	There is a listed building to the west of the site. The site lies within the poor air quality zone of the M11. The development of this site would introduce development beyond that boundary in an area with a countryside character. It would also be inappropriate to allocated land which lay totally within an area of poor air quality. The site is therefore considered unsuitable as development on this site would not contribute to sustainable patterns of development. Development of the site is not considered achievable due to the sites location within the poor air quality zone.
11Sta15	Rejected	This site lies in a small hamlet, north of the airport and east of the M11. It lies within the Countryside Protection Zone. The site forms part of parcel 9 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a moderate level of harm to the purposes of the CPZ There is a tree on front of the site fronting the road subject to a tree preservation order. There a 3 listed buildings in the vicinity to the north of the site. Burton Bower is a small hamlet with no facilities and no bus service. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
12Sta15	Rejected	The site is traversed by a ditch which means that a small area of the site lies within flood zones 2 and 3. A Local Wildlife Site lies to the east and north of the site. The Historic Settlement Character Assessment notes that High Lane is tree lined and the wider landscape in this location is enclosed by a tree screen to the east. The development of this site would introduce a significant amount of development beyond this defensible boundary. The site is therefore considered unsuitable as development on this site would not contribute to sustainable patterns of development. Development of the site is achievable subject to development avoiding the areas within flood zones 2 and 3.
13Sta15	Rejected	The site is within the Green Belt. The site forms part of parcel 2 in the Green Belt Review 2016 which was found to have a 'strong' value in meeting the purposes of the Green Belt. The development of this site would introduce a significant scale of development to Stansted and the site does contribute to the functions of the Green Belt and therefore development is considered unsuitable.

14Sta15	Rejected	The proposal suggests two housing opportunity areas, one fronting the B1051 along the southern boundary of the site and the other to the east of Gall End Lane along the western site boundary. Gall End Lane is a narrow single track road until it reaches Lower Street. Within the site there are a number of trees subject to a tree preservation order. The western edge of the site includes a narrow area of land within FRZ 2 and abuts land within FRZ 2 and 3 along Gall End Lane. There are listed building to the north and south. Stansted Castle to the south is an Ancient Monument. High Lane currently acts as a firm boundary to the eastern edge of the village with attractive countryside beyond. The land near Gall End Lane is in a marked attractive treed valley. The Historic Settlement Character Assessment considers the sunken lane at Gall End to be a fine environmental and ecological feature set in an enclosed landscape; that development at Gall End Lane would have a direct detrimental effect on the historic core nearby, and would involve the loss of a high quality sunken lane and a unique feature in the context of the village. The development of this site would introduce a significant amount of development beyond the defensible boundary of High Lane and extending along the road towards Elsenham. The site is therefore considered unsuitable as development on this site would not contribute to sustainable patterns of development.
15Sta15	Rejected	This greenfield site lies on the northern edge of the village. The southern part of the site has planning permission for 160 dwellings, 600m2 commercial floorspace, land reserved for educational uses and open/recreational space. This proposal enlarges the site with land to the north, increasing the capacity to 300 dwellings, 1000m2 commercial floorspace, 2ha land for education and 3ha open space. The site adjoins the development limits. Stansted is a key village and has a number of services and facilities. Pennington Lane is a Protected Lane. The eastern edge of the site lies within flood zones 2 and 3. There is a local wildlife site to the east of the site. The development of this larger site would introduce a tongue of development extending into the countryside. It is not considered suitable to development this larger site.
16Sta15	Preferred	The brownfield site within the airport is being proposed for employment development. Adopted policy restricts development in this area to airport related development. The 2014 Submission Local Plan (subsequently withdrawn) proposed this site for business, industry and non-strategic warehousing based on the evidence of the Employment Land Review April 2011. The site lies across the 51 – 54 LEQ aircraft noise contours at night and the 57 LEQ contour during the day. There are some Local Wildlife Sites to the south of the site. The site lies within the airport development limits, the principle of development is accepted, it has good access to the strategic highway network and therefore is considered a suitable site for commercial development.
17Sta15	Rejected	There are trees subject to preservation orders within the site and to the south of the site. There are listed buildings to the east of the site. The site adjoins land to the east within flood zones 2 and 3. The Historic Settlement Character Assessment notes that High Lane is tree lined and the wider landscape in this location is enclosed by a tree screen to the east. The development of this site would introduce a significant amount of development beyond this defensible boundary into the attractive valley setting. The site is therefore considered unsuitable as development on this site would not contribute to sustainable patterns of development.
18Sta15	Rejected	This greenfield site does not adjoin the development limits. Although there is a footpath along the B1383, the site is not within walking/cycling distance of the village facilities but the site is on the bus route between Saffron Walden and Bishop's Stortford. Pennington Lane to the south is a Protected Lane. Pennington Lane is the only road fronting the site. The lane is single width and is noted for its range of features, form, alignment, depth and width. It has also had limited or discrete erosion/damage to its historic fabric. Accessing this large site from Pennington Lane would be detrimental to these features. Development of this site would introduce significant development unrelated to the existing form of development.
19Sta15	Rejected	The western edge of the site contains trees subject to a preservation order. Along the western boundary are trees important in the landscape. Gall End Lane to the west lies within flood zones 2 and 3. The Historic Settlement Character Assessment considers the sunken lane at Gall End to be a fine environmental and ecological feature set in an enclosed landscape; that development at Gall End Lane would have a direct detrimental effect on the historic core nearby, and would involve the loss of a high quality sunken lane and a unique feature in the context of the village. High Lane currently acts as a firm boundary to the

		eastern edge of the village with attractive undulating countryside beyond. The Historic Character Assessment notes that High Lane is tree lined and the wider landscape in this location is enclosed by a tree screen to the east. The development of this site would introduce a significant amount of development beyond this defensible boundary. The site is therefore considered unsuitable as development on this site would not contribute to sustainable patterns of development.
20Sta15	Rejected	This greenfield site lies on the south western edge of the village is wholly within the Green Belt. The site forms part of parcel 8 in the Green Belt Review 2016 which was found to have a 'strong' value in meeting the purposes of the Green Belt. The site does contribute to the functions of the Green Belt and therefore development is considered unsuitable.
21Sta15	Preferred	The site of the existing auction house lies to the north of Stansted Mountfitchet. It lies beyond the development limits. Land to the north is a local wildlife site. The proposal is to provide facilities to complement the auction rooms such as artisan workshops and shops; and some office development. The auction rooms are an established commercial enterprise. There is also an office development to the south of the site. The site has access to the main road network. The site is considered suitable for employment development.
22Sta15	Rejected	This greenfield site lies between Stansted Mountfitchet and Elsenham. The site is beyond expected walking/cycling distance to services and facilities. The development of this site would introduce significant development in the countryside, unrelated to the existing development pattern of the villages. The site is therefore considered unsuitable and development on this site would not contribute to sustainable patterns of development.
23Sta15	Rejected	This is a greenfield site situated north of Stansted Mountfitchet. It does not adjoin the development limits and is located in a rural landscape. Although there is a footpath along the B1383, the site is not within walking/cycling distance of the village facilities but the site is on the bus route between Saffron Walden and Bishop's Stortford. The site is considered unsuitable as development would not contribute to sustainable patterns of development.
24Sta16	Rejected	Pennington Lane to the east is a Protected Lane. Development of the site would not extend development any further north than development planned at Walpole Farm to the east. The development of this site is reliant on the development of site 07Sta15 to the south. This would result in an increase in traffic along Rainsford Road and Croasdaile Road to the B1383. ECC as Highway Authority raised no objection in principle to an application for 140 dwellings (UTT/13/1203/OP). The site is considered suitable subject gaining access through 07Sta15 and the capacity of the road network; however this uncertainty means that there are questions surrounding achievability.
25Sta16	Rejected	The site has only road frontage with Pennington Lane which is a Protected Lane, but it is proposed that site could be accessed from the B1383 potentially via a shared access across site 15Sta15 which adjoins to the east. The development of this larger site would introduce development extending into the open countryside. It is not considered suitable to develop this larger site.
26Sta16	Preferred (Development Opportunity Site)	The site is located within the village centre. The site is identified in the Local plan as a Development Opportunity Site for Town Centre including residential uses. Planning permission was granted for 10 dwellings at 14 Cambridge Road.
27Sta17	Rejected	This greenfield site is located within the Green Belt. The site forms part of parcel 4 in the Green Belt Review 2016 which was found to have a 'strong' value in meeting the purposes of the Green Belt. The site contributes to the functions of the Green Belt. Development of the site is therefore considered unsuitable as development on the site would not contribute to sustainable patterns of development.
28Sta17	Rejected	This site lies beyond the development limits. It lies 1.5km from Stansted Mountfitchet and is separated from Elsenham by the M11. Alsa Wood ancient wood is located 200m to the north/north east. The site is located within the B10 Broxted Farmland Plateau area of the Landscape Character Assessment, which has a moderate to high sensitivity to change. The listed Down Farmhouse lies 250m to the south of the site. The site is isolated from the villages of Stansted and Elsenham and therefore the services in these villages are not accessible other than by car. The development of this site would introduce significant development in an isolated location. The site is therefore considered unsuitable as development on the site would not contribute to sustainable patterns of

		development.
01Ste15	Rejected	This site lies within the conservation area. There are listed buildings adjacent to the site. Mill Lane is characterised by ribbon development and the development of this site would introduce backland development detrimental to the character of the lane and the conservation area.
02Ste15	Rejected	The south western boundary abuts the area subject to flooding. There are listed buildings adjoining the property. There is a Local Wildlife Site to the south on the opposite side of Stebbing Brook. Planning permission has been granted for 5 dwellings along the Brick Kiln Lane frontage. This proposal is to build 9 dwellings around the properties which are on the junction of the B1057 and Brick Kiln Lane. These properties are beyond the adopted development limits respecting their location in the transition between village and countryside. This site is considered unsuitable because it would consolidate this loose knit group of dwellings, and have a detrimental impact on the wider countryside setting of the listed buildings.
03Ste15	Rejected	The site is too small / the quantum is too low to allocate the site within a strategic Plan.
04Ste15	Rejected	This greenfield site adjoins the conservation area. The site does not adjoin the development limits which exclude the area around the church. There are listed buildings either side of the site. Church End Stebbing is a compact group of listed buildings. The development of this site would impact on the setting of these listed buildings and lead to the coalescence of Church End with the dwellings to the east of the site along Watch House Road. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
07Ste16	Rejected	A small area of site lies within a 1 in 1000 surface water flood risk extending onto the west of the site. Site is within 100m of a Local Wildlife Site. Development of the site would introduce built form in an important gap on the west side of the High Street with views across the valley. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
08Ste16	Rejected	The site is within a 1 in 30 flood risk zone running across the southern section of the site from west to east. The 1 in 30 zone is thin, but 1 in 100 and 1 in 1000 risk zones extend further onto the site on either side. The site is partially within Stebbing Conservation Area. The site is also within 100m of an Scheduled Ancient Monument. Development of the site would introduce built form in an important gap on the west side of the High Street with views across the valley and with potential to impact the Scheduled Ancient Monument. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
09Ste16	Rejected	Brick Kiln Lane is a very narrow land and the site is elevated above the road. Development of the site would have a significant impact on the countryside character of the area and is therefore considered unsuitable.
10Ste16	Rejected	This greenfield site lies opposite Collops Villas in a small hamlet of houses, separate from the main village. The site is beyond expected walking distance to the school and village facilities. Development of the site would extend ribbon development within a small hamlet in the countryside with limited access to services and facilities. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
11Ste16	Rejected	This site abuts the West of Braintree Garden Community proposal. It lies beyond development limits. The Local Wildlife Sites of Stebbing Green is within 200 m of the Site. The site is close to listed buildings at Stebbing Green. The site lies some distance from services and facilities. Development of this site would introduce a significant built form in an area characterised by loose sporadic development in an area with a high risk of flooding. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
01Tak15	Preferred	This greenfield site lies adjacent to the adopted development limits and is bounded by residential development to the west, east and north. The site is served by a bus service to Bishop's Stortford and the Airport. The site is allocated for development in the Local Plan. Planning permission has been granted.

02Tak15	Rejected	This greenfield site lies within the Countryside Protection Zone. The site forms part of parcel 3 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a high level of harm to the purposes of the CPZ. There are a number of listed buildings opposite the site. The site lies beyond the ribbon of built development on the south side of the B1256 where development becomes more sporadic and therefore development is considered unsuitable.
03Tak15	Rejected	The property Millers to the east is a listed building, as is the parish church to the north. The site is separate from the development limits around Takeley. The site lies within the Countryside Protection Zone. The site forms part of parcel 4 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a high level of harm to the purposes of the CPZ. Land to the south and to the east is being/has been developed for housing. It is considered that Church Lane is a defensible boundary to the development of Takeley and to development this site would breach that boundary and extend development into the countryside. The site is therefore considered unsuitable for development because it would not lead to a sustainable pattern of development.
04Tak15	Rejected	The property Millers to the east is a listed building as is the parish church to the north. The site is separate from the development limits around Takeley. The site lies within the Countryside Protection Zone. The site forms part of parcel 4 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a high level of harm to the purposes of the CPZ. Land to the south and to the east is being developed for housing. It is considered that Church Lane is a defensible boundary to the development of Takeley and the development of this site would breach that boundary, extend development into the countryside and have an impact on the setting of the listed buildings. The site is therefore considered unsuitable for development because it would not lead to a sustainable pattern of development.
05Tak15	Rejected	Properties to the east of the site in Smiths Green are listed. The site lies within the Countryside Protection Zone. The site forms part of parcel 5 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a high level of harm to the purposes of the CPZ. Development on this site has been dismissed on appeal following refusal of a planning application. The Inspector stated that "The site is currently a gap within the street scene of Dunmow Road providing a transition between the main village of Takeley and the development further east beyond Smiths Green. Whilst the site would be well screened and the dwellings would be set back from the road, the built form would be glimpsed in views travelling in both directions along Dunmow Road. Whilst I note there would be a buffer between the site and The White House, the gap in the street scene would be significantly reduced and fundamentally alter the contribution the site makes in the street scene. As such the proposal would have a harmful effect upon the character and appearance of the area". The site is therefore not considered suitable as development on this site would not contribute to sustainable patterns of development.
06Tak15	Rejected	This greenfield site does not adjoin the adopted development limits. It lies within the Countryside Protection Zone. The site forms part of parcel 4 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a high level of harm to the purposes of the CPZ. The site lies wholly within flood zones 2 and 3 and therefore is not considered suitable for development. Development of the site is not considered achievable due to its location within flood zones 2 and 3.
07Tak15	Rejected	The rear of the site lies within the Countryside Protection Zone (CPZ). The site forms part of parcel 3 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a high level of harm to the purposes of the CPZ. The rear of the site contributes to the function of the CPZ and development is considered unsuitable. The barn to the front of the site is listed, as is the dwelling adjacent to the site to the west. Development of the site is achievable subject to mitigating impact on listed buildings and cost of clearing the site.
08Tak15	Rejected	This greenfield site lies between Takeley and the Priors Green Development. Priors Wood to the north is an Ancient Woodland and Local Wildlife Site. The site lies within the Countryside Protection Zone. The site forms part of parcel 5 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a high level of harm to the purposes of the CPZ. The site is considered unsuitable because it would harm the purposes of the CPZ and lead to coalescence of Takeley village with Priors Green and is therefore not considered a sustainable pattern of development.

09Tak15	Rejected	The site lies within the Countryside Protection Zone. The site forms part of parcel 5 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a high level of harm to the purposes of the CPZ. The development site forms a significant part of the parcel and therefore development is considered unsuitable. Bambers Green Road to the west of the site is a protected lane. Warish Hall Ancient Monument lies to the west of the site. There are listed building adjoining the site along the B1256 and at Frogs Hall to the east. There are also protected trees at Frogs Hall. The site is within walking/cycling distance of the facilities at Priors Green.
10Tak15	Rejected	This greenfield site lies within the Countryside Protection Zone. The site forms part of parcel 5 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a high level of harm to the purposes of the CPZ. The development site forms a significant part of the parcel and therefore development is considered unsuitable. Furthermore the Council's development strategy is towards larger self-sustaining Garden Communities which can support a secondary school.
11Tak15	Rejected	This proposal is a combination of sites 08Tak15 and 10Tak15. This greenfield site lies to the north of Takeley and the Priors Green Development. Priors Wood to the north is an Ancient Woodland and Local Wildlife Site. The site lies within the Countryside Protection Zone. The site forms part of parcel 5 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a high level of harm to the purposes of the CPZ. The development site forms a significant part of the parcel and therefore development is considered unsuitable. Furthermore the Council's development strategy is towards larger self-sustaining Garden Communities.
12Tak15	Rejected	This greenfield site lies within the Countryside Protection Zone. The site forms part of parcel 4 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a high level of harm to the purposes of the CPZ. Takeley parish church is a listed building and lies to the west of the site. Development of the site would have a significant intrusion into the CPZ and therefore development is not considered suitable.
13Tak15	Rejected	The site lies within the Countryside Protection Zone. The site forms part of parcel 3 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a high level of harm to the purposes of the CPZ. The proposed development site forms the majority of parcel 3 and therefore development is considered unsuitable. There are a number of listed buildings in Takeley Street. The western half of the site is subject to air noise. The woodland to the west of the site is an Ancient Woodland and Local Wildlife Site. Hatfield Forest SSSI lies in close proximity to the south.
14Tak15	Rejected	This greenfield site lies to the east of Stansted Airport and comprises 7 parcels of land and is being proposed for employment development. The site falls within the Countryside Protection Zone. The site forms part of parcel 6 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a high level of harm to the purposes of the CPZ. It adjoins the development boundary of the airport. Within the site are listed buildings and a scheduled monument, important woodlands. There is a narrow floodplain of zones 2 and 3 along the River Roding. Development of the site would lead to the coalescence of the airport with the hamlets of Molehill Green and Bambers Green and Takeley. The site forms part of parcels 6 and 7 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a high level of harm to the purposes of the CPZ.
15Tak15	Rejected	This greenfield site lies within the Countryside Protection Zone. The site forms part of parcel 4 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a high level of harm to the purposes of the CPZ. The development of the eastern part of the site would introduce an isolated development unrelated to the existing pattern of development and would lead to the coalescence of Takeley and Takeley Street. The site is therefore considered unsuitable as development on this site would not contribute to sustainable patterns of development.
16Tak15	Rejected	The site lies within the Countryside Protection Zone. The site forms part of parcel 3 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a high level of harm to the purposes of the CPZ. The proposed development site forms the majority of parcel 3 and therefore development is considered unsuitable. Also, a number of listed buildings adjoin the site to the south. Hatfield Forest SSSI lies to the south. The development of this site would lead to the coalescence of the airport with Takeley Street.

17Tak15	Rejected	The site lies within the Countryside Protection Zone and adjoins the Takeley Street development limits. The site forms part of parcel 3 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a high level of harm to the purposes of the CPZ. A number of listed buildings adjoin the site to the south. Hatfield Forest SSSI lies to the south. The development of this site would lead to the coalescence of the airport and Takeley Street. This site is considered unsuitable as development of this site would not contribute to sustainable patterns of development.
18Tak16	Rejected	This is a greenfield site located between the A120 and Stansted Airport, north of Takeley. The site is being promoted as an extension to an existing business facility. The site lies within the Countryside Protection Zone. The site forms part of parcel 3 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a high level of harm to the purposes of the CPZ.
19Tak16	Rejected	This is a greenfield site located between the A120 and Stansted Airport, north of Takeley. The site is being promoted as an extension to an existing business facility. The site lies within the Countryside Protection Zone. The site forms part of parcel 3 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a high level of harm to the purposes of the CPZ.
20Tak16	Rejected	This is a greenfield site located between the A120 and Stansted Airport, north of Takeley. The site is being promoted as an extension to an existing business facility. The site lies within the Countryside Protection Zone. The site forms part of parcel 3 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a high level of harm to the purposes of the CPZ.
21Tak16	Rejected	This is a greenfield site located between the A120 and Stansted Airport, north of Takeley and proposed for employment development. The site lies within the Countryside Protection Zone. The site is within 500m of local wildlife sites. There is a bus stop within 800m of the site. The site has access into the Airport and the A120 via Coopers Roundabout or southwards to the B1256 through Takeley. The site forms part of parcel 6 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a high level of harm to the purposes of the CPZ. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
22Tak17	Rejected	This greenfield site lies within the Countryside Protection Zone. The site forms part of parcel 3 in the Countryside Protection Zone Study 2016 which if released from the CPZ would lead to a high level of harm to the purposes of the CPZ. There are a number of listed buildings opposite the site. The Flitch Way is a linear country park and a local wildlife site. Hatfield Forest is a SSSI. The site lies beyond the ribbon of built development on the south side of the B1256 where development becomes more sporadic and therefore development is considered unsuitable.
23Tak17	Rejected	This greenfield site lies beyond development limits and connects the two development limits of Takeley and Priors Green. The Flitch Way lies along the southern boundary of the site. This site, along with Smiths Green, performs an important function in maintaining the separation between Takeley village and Priors Green. Development of this site would lead to the coalescence of these parts of the parish. The site is therefore considered unsuitable as development on the site would not contribute to sustainable patterns of development.
01Tha15	Rejected	This is a greenfield site which is located in the hamlet of Bardfield End Green. The site does not adjoin adopted development limits. There are a number of listed buildings in the hamlet. The site is mostly surrounded by agricultural fields and development would be highly visible and would have a detrimental impact on the surrounding landscape. The inspector for appeal into the refusal of permission for 2 dwellings found that the development would materially harm the character and appearance of the surrounding open countryside. The site is not within walking or cycling distance to services and facilities. This site is considered unsuitable as development would not contribute to sustainable patterns of development.
02Tha15	Rejected	This is a residential curtilage site in Monk Street, Thaxted. The site does not adjoin adopted development limits. The site is mostly surrounded by agricultural fields and development would be highly visible and would have a detrimental impact on the surrounding landscape. There is a listed building to the west of the site. The site is not within walking or cycling distance to services and facilities. This site is considered unsuitable as development would not contribute to sustainable patterns of development.

03Tha15	Rejected	There are a number of trees subject to a preservation order on the southern boundary. The site has been subject to a number of previous planning applications and has current planning permission for the demolition of the existing dwelling and the erection of three detached dwellings (UTT/13/1644/OP). In June 2012 planning permission was refused for the erection of six dwellings on the site. The decision was appealed with the appeal being dismissed in 2013 primarily because of the amount of built form that would extend further into the countryside and the resultant detrimental impact that this would have. Therefore this site is not considered suitable for 5 to 6 dwellings and is only be suitable for small scale development and this is below the threshold for allocation in the Plan.
04Tha15	Rejected	Part of the site lies within the 57Leq noise contour. The Thaxted Historic Character Assessment (2009) states that “development to the south of Sampford Road would have detrimental impacts on views of the church spire, the dominant landmark building in Thaxted thus diminishing the sense of place and local distinctiveness in this location.” Although there has been recent development on Sampford Road the development of this site, which would extend housing further eastwards would result in urbanisation of the rural area and would have a significant impact on views of the church.
05Tha15	Rejected	The site opposite is identified in the Thaxted Neighbourhood Plan as a development opportunity site. Development of this site would increase ribbon development and extend development into the open countryside.
06Tha15	Rejected	This is a greenfield site situated on the southern edge of Thaxted. This site is situated on the eastern side of Dunmow Road just outside the development limits. The Historic Settlement Character Assessment states that “The landscape in this location, as elsewhere, performs the function of clearly defining and containing the extent of the built form.” The site is therefore considered unsuitable as development here would extend the village into the open countryside in an area characterised by loose knit sporadic development.
07Tha15	Rejected	This is a narrow greenfield site situated behind residential properties on Bardfield Road. Access is via a narrow track off Dunmow Road. Development of this site would lead to inappropriate backland development. The site is therefore considered unsuitable for development.
08Tha15	Rejected	This is a greenfield site situated off Dunmow Road. The site lies beyond the development limits. The site is on the southern edge of the village and the surrounding landscape in one of open countryside. The Historic Settlement Character Assessment for Thaxted 2009 states that ‘The principle effect of development here would be to extend the village into open arable farmland.’ The development of this site would introduce considerable development in an area characterised by loose knit sporadic development. Development of the site is therefore considered unsuitable.
09Tha15	Rejected	Trees along the brook, within and adjacent the site are protected by a preservation order. The Historic Settlement Character Assessment for Thaxted states that ‘Development off Copthall Lane would result in unacceptable changes and the destruction of a narrow country lane and a small scale linear agricultural landscape.’ The site is elevated and development may be visible from Copthall Lane during winter months. Therefore depending on the design of the development, its southern edge may have a detrimental impact on the character of Copthall lane. Development of the site would extend development further eastwards along the valley of the brook. There is no defensible eastern boundary to the area being proposed for development and there is potential for the development to extend further eastwards in the future. The site is not considered suitable because of its potential impact on Copthall Lane and the access roads to the site.
10Tha15	Preferred	This previously development site lies within the village development limits. Planning permission has been granted for 29 dwellings
11Tha15	Rejected	This site lies beyond the adopted development limits. To the north of the site lies an important woodland. Copthall Lane is a narrow single track road with no pavements. The Historic Settlement Character Assessment for Thaxted states that ‘Development off Copthall Lane would result in unacceptable changes

		and the destruction of a narrow country lane and a small scale linear agricultural landscape.' The development of this site would have a detrimental impact on the character of Copthall Lane. It is proposed that vehicular traffic would be from Bardfield Road but this would create a long access road to the site and would need improving. This is an isolated site in the countryside and its development would introduce dwellings unrelated to the existing village. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development (planning permission has been granted for 7 dwellings).
12Tha15	Rejected	The site is considered too small / has too small a quantum for consideration as an allocation within a strategic Plan.
13Tha15	Rejected	The Historic Settlement Character Assessment for Thaxted (2009) notes that Copthall Lane 'is particularly attractive as it approaches the existing built up area with steep banks and overhanging trees and hedges providing particularly rural environment. Land (to the south) rises quite steeply to meet the 20th century development at Barnards Fields.' It concludes that the effect of development off Copthall Lane would be seriously detrimental to the particularly attractive rural character of this area. Development of the site is therefore considered unsuitable as development on the site would not contribute to sustainable patterns of development.
14Tha15	Preferred	This part brownfield and part greenfield site lies on the south eastern side of the village, adjacent to the development limits. The site is within walking/cycling distance of the village services and facilities. The Historic Settlement Character Assessment for Thaxted (2009) considers that the small scale of the existing barns is generally harmonious with the nearby listed building and the edge of the Conservation area. However, development or redevelopment of the site complex would have an impact on the historic core of the village. The assessment makes some recommendations as to how the site could be successfully redeveloped. The site is considered suitable for development but the design and layout would need to be sensitive to the site's location on the edge of the historic core of the village, especially considering that the site is higher than properties on Bardfield Road making any development prominent in the village setting. The site is identified for housing in the Thaxted Neighbourhood Plan.
15Tha15	Rejected	There are a number of listed buildings along Park Lane. Land to the south lies within flood zones 2 and 3. Land within the site is subject to low risk from surface water flooding and along the western boundary of the site is subject to a high risk from surface water flooding. The extensive coverage of these flood risk zones indicate that development would be unlikely to be able to avoid these areas completely. The site is within the A6 Upper Chelmer River Valley category of the Landscape Character Assessment. It has relatively high sensitivity to change. The site lies within Sector 5 - Dunmow Road to Park Street of the Historic Settlement Character Assessment. Development on Sector 5 land beyond existing Development limits would impact on the southern extent of the historic core due to its proximity in this approach. Additionally the effect of development here would be to extend the village into open arable farmland. The site is considered unsuitable as development on the site would not contribute to sustainable patterns of development.
16Tha15	Rejected	The south eastern side of the site lies within the 57 Leq noise contour. The Historic Settlement Character Assessment (2009) considers that although development in this location would not directly impact on the historic core of the village it would potentially have a detrimental impact on views of the church spire, the dominant landmark building in Thaxted, thus diminishing the sense of place and local distinctiveness. An appeal against refusal of planning permission for 120 dwellings on the site was dismissed in January 2015 (UTT/14/1033OP). The Inspector concluded that the proposed development would cause significant harm to the landscape setting of Thaxted. He considered that the extent of harm, particularly to the character and appearance of the area and the harm to the setting of the church would not constitute sustainable development in terms of the Framework. The site is therefore not considered suitable for development.
17Tha15	Rejected	This greenfield site lies to the north eastern edge of the village. The site is sandwiched between recent housing developments to the north and east. The site is in the ownership of Essex County Council and has historically been safeguarded for school or community uses. The site is being promoted by a third

		party. The site lies beyond the development limits. Numerous listed buildings are located within 500m of the site. There are a few trees subject to a preservation order on the boundary. The site has been the subject of a Bioblitz which found the site to be ecologically rich in wild flowers, birds, insects and reptiles. The site is not considered suitable for residential development. The availability of the site is uncertain as Essex County Council has not clarified their future plans for this site.
18Tha15	Rejected	This site lies within the conservation area. There are 5 trees subject to preservation orders on the site boundary and there is a listed building to the north east of the site. The Thaxted Conservation Area Appraisal and Management Proposals 2012 considers that the site provides a setting to Brooklyns which is identified as a building that makes an important architectural or historic contribution and the site is also adjacent to a listed building to the west; and a number of mature trees within the site add to its quality. The Appraisal therefore identifies the site as important open space to be protected from development with important trees and hedgerows to be protected; and Brooklyns as a building to be protected from demolition. The inspector considering the appeal into the refusal of permission for 9 dwellings concluded that the proposal would cause significant harm to the character and appearance of the Thaxted Conservation Area. The site is therefore considered unsuitable for development.
19Tha15	Rejected	This greenfield site lies within the small hamlet of Monk Street to the south of Thaxted. There are a number of listed buildings in the vicinity of the site. Folly Mill Lane to the west is a protected lane. The site is over 2km from the services and facilities in Thaxted village. The site is not considered suitable as it would not contribute to sustainable patterns of development.
20Tha15	Rejected	This is a greenfield site located at a fork in the road. The proposal is for a gypsy pitch. There are a number of listed buildings at Bardfield End Green. The site is about 950m from the primary school and a little further to the village centre. There is a very limited bus service of 1 day per week. The site being at a fork in the road is very prominent in the landscape and the development of the site would be intrusive in the countryside. The site is considered as not suitable for development.
01Ugl15	Rejected	This is a greenfield site accessed via Vicarage Lane, Ugley. Vicarage Lane is a no through road leading to a handful of large properties, a number of which are listed buildings. The character of the road and surrounding area is of open countryside. Development on this site could have a detrimental impact on the countryside character. Development on this site would not contribute to sustainable patterns of development.
02Ugl15	Rejected	The site is a greenfield site situated between the M11 and the railway line and located close to Jacks Wood, ancient and important woodland. The site is being promoted as a possible exception site. There would have to be a local needs assessment carried out and support from the community. The site is located in an area of open countryside and development on this site could have a detrimental impact on the surrounding countryside. The site is not within walking/cycling distance of services and facilities and as such development on this site would not contribute to sustainable patterns of development.
03Ugl15	Rejected	This is a greenfield site on the western edge Elsenham, situated in close proximity to the M11. Access to the site is in-between two residential dwellings off Bedwell Road and the site constitutes backland development. The housing to the east of the site is low density and the development of this site would introduce higher density housing uncharacteristic of the area to the detriment of the rural character of the area. Small scale development, which falls below the threshold of this assessment may be suitable and could be pursued through pre-application advice, however the proposal for 12 dwelling is not considered suitable.
04Ugl15	Rejected	The character of the area is open countryside, development on this site could have a detrimental impact on the surrounding landscape. The site is not within walking/cycling distance of basic facilities and services and is therefore not suitable for market housing as it does not contribute to sustainable patterns of development.
05Ugl15	Rejected	This site is situated behind the Chequers public house, a grade II listed building. The site has a number of current uses. Despite the site being in close proximity to some residential dwellings the area is characterised as open countryside. The site is not within walking distance to services and facilities. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.

01Wen15	Rejected	This is a greenfield site which does not adjoin the existing village development limit. This site represents a break in frontage development. The character of the site and immediate vicinity is one of open countryside. The introduction of built form would have a detrimental impact on the rural character of the surrounding countryside. The inspector dealing with the appeal against the refusal of permission for 1 dwelling found that the development would have a significant detrimental impact on the rural setting of the site which was not well integrated into the fabric of the village and was therefore not sustainable development. Wendens Ambo has limited services and facilities. The site is considered unsuitable as development would not contribute to sustainable patterns of development.
02Wen15	Rejected	This greenfield site lies on the eastern edge of the village adjacent to the B1383. The site has previously been promoted and allocated for employment uses in the withdrawn 2014 Submission Local Plan. The site is now being promoted for residential development. The site adjoins the development limits to the west. Small and peripheral areas of the site are subject to surface water flooding. The site is within the A1 Cam River Valley category of the Landscape Character Assessment. It has a relatively high sensitivity to change. The public house on the other side of the B1383 is listed. Wendens Ambo is a type B village with limited services and the site is considered unsuitable as residential development on the site would not contribute to sustainable patterns of development.
01WRod15	Rejected	This greenfield site is wholly within the Green Belt. The site forms part of parcel 24 in the Green Belt Review 2016 which was found to have a 'strong' value in meeting the purposes of the Green Belt. The site does contribute to the functions of the Green Belt. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
01Wic15	Rejected	This is a greenfield site which does not adjoin the existing village development limit. There are a number of listed buildings in the vicinity of the site. The church yard, to the south east of the site is a local wildlife site. The site is located on a small street with low density development. Development here could have a detrimental impact on the rural character of the surrounding countryside. Wicken Bonhunt is a Type B village with limited services and facilities. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
02Wic15	Rejected	This is a greenfield site outside the village development limits. Development of this site would consolidate the loose knit development in the location and lead to the coalescence of the east and western parts of the village. A strip on the northern edge of the site lies within flood zone 3 and mitigation measures would need to be considered when assessing the viability of the site. Wicken Bonhunt is a Type B village with limited facilities and the site is not in walking/cycling distance of basic services. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
03Wic17	Rejected	This greenfield site lies within the central gap between the 2 parts of the village. A small part of the site's boundary adjoins the development limits. The site is west of a Local Wildlife site at the church yard. The site is located within 2 areas of the Landscape Character Assessment. The first being the A1 Cam River Valley, which has a relatively high sensitivity to change; and the second being the H2 Arkesden Chalk Upland, which has a moderate to high sensitivity to change. The site is within 500m to 16 listed buildings, the closest being the grade II Timber Framed Barn Wicken Hall east of the site. The site forms part of the important open gap which separates the two parts of the village. Development of this site would consolidate the loose knit development in the location and lead to the coalescence of the east and western parts of the village. Wicken Bonhunt is a Type B village with limited facilities and the site is not in walking/cycling distance of basic services. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
01Wid15	Rejected	Widdington is a Type B village with limited services and facilities. The site has been subject to a number of appeals against refusal for between 1 and 6 dwellings. Inspectors have considered that development would not provide a sustainable form of development and would harm the rural character of the lane and the local area by removing the openness of the site. Due to the lack of services in Widdington and the impact of the development on the character of the area the site is not considered suitable for development.
		There are a number of listed buildings to the west of the site and Cornells Lane is a protected lane. Widdington is a Type B village with limited services and

02Wid15	Rejected	facilities. Due to the lack of services, Widdington is not considered a sustainable location for development.
01Wim15	Rejected	The site is in close proximity to Carver Barracks but sits some distance from Wimbish and as such is unrelated to the village. Development of this site would introduce additional dwellings in the countryside and could have a detrimental impact on the countryside character of the area. Wimbish is a type A village with a school, however this site is beyond the normal walking/cycling distance of these services. This site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
02Wim15	Rejected	This is a greenfield site containing agricultural buildings in an isolated location between Tindon End and Thaxted. The site abuts a Grade II listed farmhouse and is accessed via a narrow single track road which would be unsuitable for the scale of development proposed. The site, being 3km from Thaxted village centre is not within walking/cycling distance of basic services and facilities. The development of the site would introduce significant development in an isolated location. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
03Wim15	Rejected	This is a greenfield site containing agricultural buildings in an isolated location between Tindon End and Thaxted. The site abuts a Grade II listed farmhouse and is accessed via a narrow single track road which would be unsuitable for the scale of development proposed. The site, being 3km from Thaxted village centre is not within walking/cycling distance of basic services and facilities. The development of the site would introduce significant development in an isolated location. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.
04Wim15	Rejected	This is a greenfield site containing agricultural buildings in an isolated location between Tindon End and Thaxted. The site abuts a Grade II listed farmhouse and is accessed via a narrow single track road. The site, being 3km from Thaxted village centre is not within walking/cycling distance of basic services and facilities. The development of the site would introduce development in an isolated location. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.

Appendix V: SA of reasonable alternatives

Introduction

As explained within 'Part 1' in the main report (Chapters 4 to 8), a focus of work has been on the development and appraisal of district-wide spatial strategy alternatives, with a view to informing determination of the preferred strategy.

A number of interim steps necessary were necessary in order to establish district-wide spatial strategy options and these included an appraisal of options for the delivery of garden Communities as well as growth options for Takeley Village. Options were also explored for the delivery of strategic employment land during the plan period.

This appendix sets out the detailed appraisal findings for the identified reasonable alternatives. It is structured as follows:

- Appraisal methodology;
- Garden Community options;
- Takeley growth options;
- Spatial strategy options; and
- Strategic employment land options.

Appraisal methodology

For each of the options, the assessment examines **likely significant effects** on the baseline, drawing on the sustainability objectives identified through scoping (see Table 3.1 in the main report) as a methodological framework. **Green** is used to indicate significant positive effects, whilst **red** is used to indicate significant negative effects. If no colour is used then no residual significant effects are predicted.

Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how scenarios will be implemented 'on the ground' and what the effect on particular receptors would be. Where there is a need to rely on assumptions in order to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.

Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a **rank of preference**. The number indicates the rank and does not have any bearing on likely significant effects. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'.

Finally, it is important to note that effects are predicted taking into account the criteria presented within Regulations.⁹⁵ So, for example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. where the effects of the plan in combination with the effects of other planned or on-going activity that is outside the control of the Uttlesford District Local Plan).

⁹⁵ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

Garden Community options

Within the main report, Chapter 8 explains how options for the delivery of Garden Communities were identified. The options for assessment are identified within the table below.

Option		Delivery during the plan period (up to 2033)	Delivery total
Option 1: North Uttlesford		1,925 dwellings	5,000 dwellings
Option 2: West of Braintree	2a: Delivery on the southern site only within Uttlesford	970 dwellings	8,500 - 9,000 dwellings (including 1,500 dwellings total on the southern site)
	2b: Delivery on the southern and northern site within Uttlesford	970 dwellings	10,500 - 11,000 dwellings (including 3,500 dwellings total on the northern and southern site)
Option 3: Easton Park	3a: Reduced level of growth focussing development centrally within the site	1,925 dwellings	5,000 dwellings
	3b: Preferred level of growth	1,925 dwellings	10,000 dwellings

Appraisal findings for the Garden Community options

A comparative appraisal of the options was carried out under each SA Objective. The findings are presented in the tables below.

SA Objective 1: To conserve and enhance biodiversity (habitats, species and ecosystems) within the district					
	Option 1: North Uttlesford (5,000 dwellings)	Option 2a: West of Braintree (8,500-9,000 dwellings) (1,500 in Uttlesford)	Option 2b: West of Braintree (10,500-11,000 dwellings) (3,500 in Uttlesford)	Option 3a: Easton Park (5,000 dwellings)	Option 3b: Easton Park (10,000 dwellings)
Rank	2	4	4	1	3
Significant effect?	No	Yes - Negative	Yes - Negative	No	Yes - Negative
Discussion	<p><i>North Uttlesford</i></p> <p>The site at North Uttlesford (proposed under Option 1) contains a 'Special Verge' also designated as a Local Wildlife Site (Great Chesterford - Stumps Cross on A11) which is located along the northern border of the site. It also partially contains another 'Special Verge' designated as a Local Wildlife Site (LWS); in the south west along the B184, and a small area of BAP Priority Habitat (Deciduous Woodland) in the north east of the site. The site lies adjacent to an area of Important Woodland⁹⁶ in the east, and in relatively close proximity to the Crave Hall Meadow LWS and Burton Wood LWS located in the east and south east by Crave Hall and Burtonwood Farmhouse. Waterbodies on site (ponds, ditches and streams) are also considered likely to contribute to biodiversity and ecological connectivity. Whilst development is considered unlikely to result in direct loss of the designated biodiversity on site (as the habitats are roadside verges), it is considered that there is the potential for minor long term negative effects as a result of increased disturbance, noise, light and air pollution, and potential loss of ecological features such</p>				

⁹⁶ As identified within the Uttlesford District Policies Map.

as ponds. In terms of the wider setting, the site lies within the SSSI Impact Risk Zone of the Nunn Woods SSSI; housing development is not identified as requiring further consultation with Natural England with regards to risk to the SSSI, but the development of any associated road infrastructure may require further consultation.

West of Braintree

The whole site under consideration at the West of Braintree (including the land within Braintree District) contains designated biodiversity assets, including Broxted Wood LWS and a number of areas of BAP Woodland Priority Habitats, including areas of Ancient Woodland. Development will need to retain these habitats on site to avoid significant negative effects arising in relation to habitat loss. Overall it is considered likely that development will lead to minor negative effects on biodiversity habitats and the species they support as a result of increased disturbance, noise, light and air pollution; with the potential for minor long term negative effects. In terms of the wider setting, the site lies within the SSSI Impact Risk Zone of the Bovingdon Hall Woods SSSI; however, the type of development proposed is not identified as requiring further consultation with Natural England. In terms of the options proposed, the difference lies in the development of the southern site that falls within the Uttlesford boundary (Option 2a) versus both the southern and northern sites that fall within the Uttlesford boundary (Option 2b). In this respect, the northern site (Option 2b) is not known to contain designated biodiversity, however it does lie adjacent to an area of Ancient Woodland that is also designated as a LWS (Mouslin Wood) and, as such, it is considered that there is the potential for minor long term negative effects on the LWS as a result of increased disturbance, noise, light and air pollution. As such, the higher growth option (Option 2b) has the potential for negative effects of greater significance than the lower growth option (Option 2a) which does not include the northern site.

Easton Park

There are also significant biodiversity assets within and surrounding the Easton Park site. Adjacent to the site (proposed under Option 3b) in the south east is High Wood, Dunmow SSSI. The SSSI lies in close proximity to Important Woodland and Priority Habitat at Canfield Spring. Canfield Spring is located within the development site is considered likely to be a supporting habitat for the SSSI. In the north of the site (Option 3b) there are further BAP Priority Habitats, including Deciduous Woodland at Broxted Common Wood in the north east, and Ancient Woodland at Middlefield Wood in the north west; which is also designated as a LWS. The lower growth option (Option 3a) locates development centrally within the site so as to minimise the effects on biodiversity, by avoiding the loss of the majority of these woodland habitats. However, in the long term it is still considered likely that development will lead to minor negative effects through increased disturbance, noise, light and air pollution.

Whilst there is the potential for development across the whole site (proposed under Option 3b) to have significant negative effects on biodiversity through direct loss of designated and important habitats (alongside the same potential for minor negative effects as a result of increased disturbance, noise, light and air pollution), this needs to be considered alongside the potential to possibly retain and enhance these habitats and deliver significant positive effects. The larger scale proposal under Option 3b includes delivery of a Country Park and, if this option is progressed, then alongside retaining the existing woodland habitats, development should ideally seek to 1) extend and enhance habitats in the south of the site, to provide a natural buffer around the SSSI site (that contributes to the management aims of the site identified by Natural England⁹⁷), and 2) creates ecological corridors connecting the northern and southern woodland habitats on site. The enhancement of biodiversity in this area has the potential to yield significant positive effects by supporting ecological connectivity and improving the status of the SSSI which is currently recognised as in an 'unfavourable - no change' condition.⁹⁸

There are also significant biodiversity assets surrounding the Easton Park site. Quenden Wood and Easton Wood SSSIs are located just north west of the site, and Hatfield Forest SSSI and

⁹⁷ Natural England (2003) Views About Management – A statement of English Nature's views about the management of High Wood, Dunmow Site of Special Scientific Interest (SSSI)
<https://designatedsites.naturalengland.org.uk/PDFsForWeb/VAM/1003967.pdf>

⁹⁸ Natural England (2018) Designated Sites View – SSSI Condition Summary [online] available at:
[https://designatedsites.naturalengland.org.uk/ReportConditionSummary.aspx?SiteCode=S1003967&ReportTitle=High Wood, Dunmow SSSI](https://designatedsites.naturalengland.org.uk/ReportConditionSummary.aspx?SiteCode=S1003967&ReportTitle=High%20Wood,%20Dunmow%20SSSI)

National Nature Reserve is located in the south west beyond Takeley Village. It is recognised that development of the Garden Community at Easton Park has the potential to negatively affect these designated habitats through increased recreational pressures and decreased air quality in the vicinity (as a result of likely increases in local traffic - particularly along the A120). It is also considered that the higher growth scenario (Option 3b) is likely to lead to effects of greater significance than the lower growth option (Option 3a). In line with advice from Natural England, it is recommended that Local Plan policy provisions seek contributions towards the delivery of mitigation measures to address the likely impacts of recreational disturbance and decreased air quality at Hatfield Forest from all development falling within the emerging Zone of Influence (ZoI).

Conclusions

Overall, it is considered that each of the GC options present biodiversity constraints that would need to be addressed. Given the extent of designated habitats within Options 2a, 2b, and 3b, these are considered most likely to have the potential for negative effects of greater significance. The assessment however also identifies significant potential under Option 3b to deliver positive effects through biodiversity enhancement/ net gain. Options 1 and 3a largely avoid designated biodiversity assets (most significantly under Option 3a) and are both considered less likely to result in significant negative effects for biodiversity compared to the other options.

It is also considered that biodiversity could potentially be enhanced at each of the GC sites through strong Local Plan policies on biodiversity net gain.

In line with advice from Natural England, it is also recognised that the significant levels of growth at Garden Communities has the potential to impact the Epping Forest Special Area of Conservation (SAC) as a result of decreased air quality (associated with the likely increase in traffic and congestion as a result of development). This is assessed in more detail through the accompanying Habitat Regulations Assessment (HRA), however it is recommended that policy provisions seek contributions from development to support the ongoing mitigation and monitoring of effects on air quality in the vicinity of the Epping Forest SAC.

SA Objective 2: To conserve and enhance water quality and resources and help achieve the objectives of the Water Framework Directive					
	Option 1: North Uttlesford (5000 homes)	Option 2a: West of Braintree (8,500-9,000 dwellings) (1,500 in Uttlesford)	Option 2b: West of Braintree (10,500-11,000 dwellings) (3,500 in Uttlesford)	Option 3a: Easton Park (5000 homes)	Option 3b: Easton Park (10,000 homes)
Rank	2	3	3	1	3
Significant effect?	No	No	No	No	No
Discussion	<p><u>Water quality</u></p> <p>North Uttlesford</p> <p>Development at the North Uttlesford site (Option 1), given its location, is not considered likely to affect the main rivers running through the Plan area. The site is, however, located within a Groundwater Source Protection Zone and contains other waterbodies (likely ponds, ditches/ streams) and therefore development has the potential to affect the quality of groundwater and/ or surface water. It is recommended that any development at this site should incorporate sustainable drainage systems.</p> <p>West of Braintree</p> <p>The West of Braintree development site as a whole (including the land within Braintree District) is constrained by the River Ter in the south of the site, and the River Brain in the north east of the site (within Braintree). The latest WFD classification (2016)⁹⁹ identifies that both the River Ter and the River Brain are of 'moderate' ecological quality and 'good' chemical quality. While there is the potential for negative effects given the presence of the waterbodies on site, it is also considered that mitigation available at the development management level (and supported by site specific policy should the option proceed) could significantly reduce the potential for negative effects, and enhance the potential for development to deliver positive effects in terms of ecological quality enhancements in this area. It will also be important for development at the site to provide mitigation (including sustainable drainage systems) to ensure that groundwater and/ or surface water quality supports or enhances the ecological and chemical quality of the rivers. In terms of the options proposed, the difference lies in the development of just the southern site that falls within the Uttlesford boundary (Option 2a) or both the southern and northern sites that fall within the Uttlesford boundary (Option 2b). In this respect, the northern site (under Option 2b) is not constrained by either river, and therefore both options are considered to perform on a par with each other in terms of the effects on this SA objective.</p> <p>Easton Park</p> <p>The full extent of the Easton Park site (Option 3b) includes the River Roding running along the western boundary of the site, and a tributary extending into the south of the site. Falling within the Upper Roding (to Cripsey Brook) catchment area, the river was found in 2016¹⁰⁰ to be of 'poor' ecological quality and 'good' chemical quality. Whilst development under Option 3a would largely avoid the watercourses (by focusing development centrally within the site), it will be important for development to minimise effects on surface water quality (e.g. through the incorporation of sustainable drainage systems), to avoid negative effects on the ecological and chemical quality of the River Roding associated with surface water run-off. The potential for negative effects is greater under Option 3b given that the larger site contains waterbodies; however, it is considered that mitigation available at the development management level (and supported by site specific policy should the option proceed) could significantly reduce the potential for negative effects, and enhance the potential for development to deliver positive effects in terms of ecological quality enhancements in this area. While the EA have expressed</p>				

⁹⁹ Environment Agency (2016) Catchment data explorer [online] available at: <http://environment.data.gov.uk/catchment-planning/> [accessed 20/11/18]

¹⁰⁰ Ibid.

	<p>concerns in relation to the Easton Park GC and potential options for addressing wastewater and sewerage infrastructure, the WCS considered this issue and indicated that development can be accommodated.</p> <p><i>Conclusions</i></p> <p>Overall, the potential for negative effects is greatest under Options 2a, 2b and 3b given the presence of main rivers on-site; although it should be noted that policy mitigation (including the provisions of the NPPF) and mitigation available at the development management level should be sufficient to ensure that development does not lead to any significant negative effects. It is also considered that there is the potential for minor negative effects on water quality under Option 1 given the presence of 'other' waterbodies (e.g. ponds) on site and the site's location within a Groundwater Source Protection Zone. The Option 3a site does not contain waterbodies and, as such, is considered to perform best against this SA objective; however, it will still be important to ensure that development minimises polluted run-off which may affect waterbodies off site.</p> <p>Water resources</p> <p>The Water Cycle Study (2018)¹⁰¹ identifies that Uttlesford District is partly underlain by a chalk aquifer of regional importance and the Environment Agency currently class the surface water and groundwater resources within the district as over-licensed or over-abstracted, meaning there that there is no additional water available for supply. The District falls within Affinity Water's supply area. Water companies in England are legally required to supply water to private consumers and businesses within their area. As set out in the Water Industry Act 1991, they must prepare and maintain a Water Resources Management Plan (WRMP) that sets out how the company intends to maintain the balance between water supply and demand. Water companies are currently in the process of updating their WRMPs to take account of predicted growth and ensure that there are schemes in place to meet future demands.¹⁰² As the scale of growth proposed under the options increases so does the pressure on water resources. However, given the legal requirements in place for WRMPs, it is considered that there are no significant differences between the options in terms of effects on water resources. In line with the Water Cycle Study recommendations, Local Plan policies should encourage the conservation of water in new dwellings and commercial properties to minimise negative effects on water resources. It is expected that development at any of the Garden Community options can deliver mitigation (for example rainwater harvesting measures) to support reduced water use per person per day.</p> <p>The Water Cycle Study also assessed the impacts of development at the Garden Community options¹⁰³ on wastewater treatment and sewage infrastructure and found that, overall, there were no 'show-stoppers' that would prevent a timely delivery of at least one suitable technically feasible option to discharge to existing Water Recycling Centres (WRC) for each Garden Community. Furthermore, given the scale of growth under each of the options, there would be the potential to provide a new, separate on-site WRC to serve each community; however, in line with current legislation and policies, new discharges should be connected to existing infrastructure where it is reasonable to do so.</p>
--	---

¹⁰¹ Arcadis Design and Consultancy prepared for Uttlesford District Council (2018) Water Cycle Study Detailed Update [online] available at: <https://www.uttlesford.gov.uk/article/4942/Infrastructure> [accessed 30/11/18]

¹⁰² Affinity Water (2014) Water Resource Management Plan.

¹⁰³ It should be noted that the options tested through the Water Cycle Study are not precisely the same as the five options being appraised in this assessment.

SA Objective 3: To conserve and enhance the district's landscape character and townscapes					
	Option 1: North Uttlesford (5000 homes)	Option 2a: West of Braintree (8,500-9,000 dwellings) (1,500 in Uttlesford)	Option 2b: West of Braintree (10,500-11,000 dwellings) (3,500 in Uttlesford)	Option 3a: Easton Park (5000 homes)	Option 3b: Easton Park (10,000 homes)
Rank	5	1	2	3	4
Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative
Discussion	<p><i>North Uttlesford</i></p> <p>The North Uttlesford site (Option 1) lies wholly within the Cam River Valley Landscape Character Area (LCA). Suggested Landscape Planning Guidelines for the LCA¹⁰⁴ include; conserving and enhancing the landscape setting of settlements; maintaining cross-valley views; and ensuring any development on valley sides is small-scale and that it responds to historic settlement pattern, form and building materials. The Landscape & Visual Appraisal of the site (2017)¹⁰⁵ concludes that the land at the North Uttlesford site “is of high landscape and visual sensitivity, given its steeply sloping landform and elevated position; its open fields and its 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. As such, it is desirable to limit development on the upper valley sides and the ridgeline.” The appraisal also identifies that good design will be key in mitigating the potential landscape and visual impacts of any development proposals for the site. However; given the overall landscape and visual sensitivity of the site, the potential for significant long term negative effects is identified at this stage. It is recommended that any policy mitigation ensures that development minimises impacts by adhering to the guidelines for development outlined by the Landscape & Visual Appraisal for the site, and avoids significant negative effects on the landscape and townscape character of the area; particularly by locating development away from the upper valley sides and ridgeline of the site.</p> <p><i>West of Braintree</i></p> <p>With regard to the West of Braintree options (Options 2a and 2b); both of the sites within Uttlesford District lie within the Rayne Farmland Plateau LCA. Landscape guidelines for this LCA¹⁰⁶ include; maintaining cross-valley views and characteristic views across the valley; and conserving the hedgerow pattern and strengthening planting where appropriate to local landscape character. The Landscape & Visual Appraisal of the site (2017)¹⁰⁷ concludes that the land at the West of Braintree (whole site to include land within Braintree) “is of moderate to high landscape and visual sensitivity, varying across the site, and concludes that there is potential for part of the site to accommodate development, subject to appropriate mitigation developed in accordance with published landscape character guidelines, planning policy and the opportunities and constraints identified within the Appraisal.” The Appraisal finds that “the easternmost 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.” Given the identified sensitivity of the site, it is appropriate at this stage to highlight the potential for significant negative effects on landscape character, particularly to the east of the site. However, mitigation as outlined by the Landscape & Visual Appraisal, which reduces the extent of development (to avoid the most sensitive areas), is considered likely to reduce the significance of the potential negative effects. It is worth noting at this stage that the sites within Uttlesford District are located to the west of the larger site, and thus are not located within the area identified as being most sensitive to development. However, given that more development is proposed through Option 2b, the effects of the higher growth option (Option 2b) are considered likely to be of greater significance than the lower growth option (Option 2a).</p>				

¹⁰⁴ Chris Blandford Associates prepared for Uttlesford District Council (2006) Landscape Character Assessment [online] available at: <https://www.uttlesford.gov.uk/article/4937/Environment>

¹⁰⁵ Chris Blandford Associates prepared for Uttlesford District Council (2017) Land at North Uttlesford Landscape & Visual Appraisal [online] available at: <https://www.uttlesford.gov.uk/article/4937/Environment> [commissioned by the Council]

¹⁰⁶ Chris Blandford Associates prepared for Uttlesford District Council (2006) Landscape Character Assessment [online] available at: <https://www.uttlesford.gov.uk/article/4937/Environment>

¹⁰⁷ Chris Blandford Associates prepared for Uttlesford District Council (2017) Land West of Braintree Landscape & Visual Appraisal [online] available at: <https://www.uttlesford.gov.uk/article/4937/Environment>

	<p>Easton Park</p> <p>In relation to the Easton Park options, the smaller site under Option 3a falls entirely within the Broxted Farmland LCA. Whilst the larger site under Option 3b falls primarily within this area as well, the north-eastern corner of the site also falls within the Upper Chelmer River Valley LCA. Landscape guidelines for the Broxted Farmland LCA¹⁰⁸ include; strengthening and enhancement of hedgerows; conserving and managing areas of ancient and semi-natural woodland; and conserving historic lanes. The Landscape & Visual Appraisal for the site (2017)¹⁰⁹ concludes that the land at Easton Park is “<i>of moderate to high landscape and visual sensitivity, varying across the site, and concludes that there is the potential for part of the site to accommodate development, subject to appropriate mitigation developed in accordance with published landscape character guidelines, planning policy and the opportunities and constraints identified within the Appraisal.</i>” The Appraisal finds that “<i>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. The southern part of the site is of lesser sensitivity to development, given the range of land uses within include an aggregates quarry, the A120 and Stortford Road, all of which reduce the sense of tranquillity and landscape quality in this area.</i>” Given the identified sensitivity of the site, it is appropriate at this stage to highlight the potential for significant negative effects on landscape character, particularly to the north of the site. However, mitigation as outlined by the Landscape & Visual Appraisal which reduces the extent of development (to avoid the most sensitive areas) is considered likely to reduce the significance of the potential negative effects; however, this is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures.</p> <p>Conclusions</p> <p>Overall, all of the options are located in areas of high (Option 1), or moderate to high (Options 2a, 2b, 3a and 3b), landscape and visual sensitivity. Given the high sensitivity of the landscape at the North Uttlesford site (Option 1) the effects are considered to be of slightly greater significance compared to other options. Evidence indicates that careful planning and the sensitive design and location of development within the sites can reduce the potential for negative effects; however, each option contains particular areas that are significantly sensitive to development and care and appropriate mitigation of these impacts will be required in order to minimise the potential for long term negative effects on landscape and townscape settings. The higher growth options are also considered likely to lead to effects of greater significance more generally than the lower growth options.</p>
--	---

¹⁰⁸ Chris Blandford Associates prepared for Uttlesford District Council (2006) Landscape Character Assessment [online] available at: <https://www.uttlesford.gov.uk/article/4937/Environment>

¹⁰⁹ Chris Blandford Associates prepared for Uttlesford District Council (2017) Land at Easton Park Landscape & Visual Appraisal [online] available at: <https://www.uttlesford.gov.uk/article/4937/Environment>

SA Objective 4: To conserve and enhance soil and contribute to the sustainable use of land					
	Option 1: North Uttlesford (5000 homes)	Option 2a: West of Braintree (8,500-9,000 dwellings) (1,500 in Uttlesford)	Option 2b: West of Braintree (10,500-11,000 dwellings) (3,500 in Uttlesford)	Option 3a: Easton Park (5000 homes)	Option 3b: Easton Park (10,000 homes)
Rank	1	2	4	1	3
Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative
Discussion	<p><i>North Uttlesford</i></p> <p>Development at the North Uttlesford site (Option 1) is likely to result in the loss of Grade 2 and 3 agricultural land (the sub-grade 3a or 3b is unknown at this stage due to shortcomings in the available data). Given the predominance of Grade 2 Best and Most Versatile (BMV) agricultural land (agricultural land of the highest quality), development is considered likely to lead to significant permanent negative effects.</p> <p><i>West of Braintree</i></p> <p>The majority of the West of Braintree site (including the land outside of Uttlesford District) is Grade 2 BMV agricultural land and development at the site will result in a significant loss of this soil resource with the potential for permanent significant negative effects. In terms of the options proposed, the difference lies in the development of just the southern site that falls within the Uttlesford boundary (Option 2a) or both the southern and northern sites that fall within the Uttlesford boundary (Option 2b). In this respect, the northern site (featured in Option 2b only) is a mix of Grade 2 and Grade 3 agricultural land and the higher growth option, by including this land, would lead to negative effects of greater significance than the lower growth option (Option 2a).</p> <p><i>Easton Park</i></p> <p>At Easton Park the land is largely Grade 2 BMV agricultural land, except for a small portion of the north-eastern corner of the site (applicable to Option 3b only). Development under Options 3a and 3b is considered likely to lead to significant permanent negative effects; however, given the extra land take under Option 3b, the effects are likely to be of greater significance for this higher growth option.</p> <p><i>Conclusions</i></p> <p>Overall, development under any of the options will result in the loss of high quality agricultural land at a significant scale; with likely significant permanent negative effects on soil resources. It is considered that the higher growth options are likely to lead to negative effects of greater significance than the lower growth options, given the associated increases in land take.</p>				

SA Objective 5: To maintain and enhance the district's cultural heritage assets and their settings					
	Option 1: North Uttlesford (5000 homes)	Option 2a: West of Braintree (8,500-9,000 dwellings) (1,500 in Uttlesford)	Option 2b: West of Braintree (10,500-11,000 dwellings) (3,500 in Uttlesford)	Option 3a: Easton Park (5000 homes)	Option 3b: Easton Park (10,000 homes)
Rank	4	1	2	3	4
Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative
Discussion	<p><i>North Uttlesford</i></p> <p>The North Uttlesford site (Option 1) contains a scheduled monument (a Romano-Celtic temple 400m south of Dell's Farm) and the development site surrounds Park Farm which contains a listed building. The scheduled monument is considered rare nationally with only about 150 sites recorded in England; the reasons for designation identify that "in view of their rarity and their importance in contributing to the complete picture of Roman religious practice, including its continuity from Iron Age practice, all Romano-Celtic temples with surviving archaeological potential are considered to be of national importance." It is further identified that "despite damage caused by prolonged ploughing, the Romano-Celtic temple complex 400m south of Dell Farm survives well" and "although part of the site, including the central building, has been excavated, the greater part of the area within the temenos [surrounding sacred precinct] has not been explored."¹¹⁰ At this stage of assessment it is recognised that there is the potential for significant negative effects on the historic environment as a result of development. However, mitigation measures may reduce the likelihood and significance of negative effects, and development has the potential to deliver positive effects also. The scheduled monument is located in the south-west of the site adjacent to the border; as such, it is identified that development has the potential to avoid this area of the site, and contribute to increasing the archaeological understanding of the site through facilitating further archaeological investigation.</p> <p>Whilst development at the North Uttlesford site (Option 1) will surround the listed building at Park Farm, a land buffer around the listed building exists, and it is considered that development has the potential for both positive and negative effects. Mitigation available at the project level/ development management stage is likely to ensure that no significant negative effects arise (including mitigation provided for through the NPPF); and the consideration of good, high quality design and appropriate layout may also lead to landscape/ townscape improvements and positive effects such as increased awareness and access.</p> <p>Further to the above, the south-western corner of the North Uttlesford site (Option 1) extends to Walden Road, adjacent to the Great Chesterford settlement. The scheduled monument on site is known to be connected to the historic settlement which contains further scheduled monuments including; a Roman Fort, a Roman town, and Roman and Anglo Saxon cemeteries. Though not adjacent to the North Uttlesford option, much of Great Chesterford is a designated conservation area containing many listed buildings. The delivery of 5,000 homes adjacent to this settlement is considered likely to significantly impact on its historic character and setting, however; the overall significance of the effects will ultimately be dependent on details such as design and layout and overall reliance on Great Chesterford and its services, facilities and infrastructure.</p> <p>The Uttlesford Heritage Impact Assessment¹¹¹ also identifies the following non-designated heritage assets on site at the North Uttlesford option (Option 1): Chesterford Deer Park, Dells Farm, The Mills and historic routes/ boundaries (Park Road). It will important for any site-specific policy to enhance protections for the non-designated assets on site to avoid long term minor negative effects arising in this respect.</p> <p><i>West of Braintree</i></p> <p>At the West of Braintree site, the Uttlesford Heritage Impact Assessment¹¹² assesses the wider allocation to include the land within Braintree, and identifies overall that there are listed buildings on site, a non-registered park and garden (Blake House Farm - small arboretum) and two non-</p>				

¹¹⁰ Historic England (2018) List Entry: Romano-Celtic temple 400m south of Dell's Farm. List Entry Number: 1017453 [online] available at: <https://historicengland.org.uk/listing/the-list/list-entry/1017453>

¹¹¹ Donald Insall Associates (2018) Uttlesford Heritage Impact Assessments [online] available at: <https://www.uttlesford.gov.uk/article/4940/Historic-environment>

¹¹² Ibid.

designated assets (Old Hall moat and fishponds, and Airfield buildings and firing range - the Butts).¹¹³ Further to this there are a large number of heritage assets surrounding the site, including: Great Saling Conservation Area, Saling Hall and Saling Grove Registered Parks and Gardens, and further listed buildings and non-registered assets. The overall development of the site is likely to significantly impact upon the historic character of the area and the rural setting; and, as such, the potential for significant negative effects is identified at this stage. In regards to the sites promoted within the district at the West of Braintree (Options 2a and 2b), neither is known to contain any designated heritage assets; however, both sites lie in close proximity to listed buildings, particularly the southern site (featuring in both Options 2a and 2b) in the west around Stebbing Green. It is considered that development at the sites within the District have the potential for both positive and negative effects; which are ultimately dependent on detail such as design and layout. The higher growth option (Option 2b) by developing more land within a rural setting is considered to have the potential for negative effects of greater significance than the lower growth option (Option 2a).

Easton Park

The Easton Park site (Options 3a and 3b) is also subject to significant historic environment constraints. In particular, Easton Lodge Registered Park and Garden is located in the north-east of the site (featuring within Option 3b), and the site contains three listed buildings. Further to this, the Uttlesford Heritage Impact Assessment¹¹⁴ identifies three non-designated assets (World War II Airfield, Brookend Farmhouse, and Strood Hall) and 12 Sites of Special Archaeological Interest on site. The site is also adjacent to/ partially within the recently designated Little Easton Conservation Area. At this stage of assessment it is recognised that there is the potential for significant negative effects on the historic environment as a result of development. However, mitigation measures may reduce the potential for negative effects - in particular considerations for mitigation should include high quality design and layout, and appropriate archaeological investigations prior to development. It is also considered that development has the potential to deliver positive effects; if it retains the identified heritage assets on site and seeks to improve access and understanding of the heritage setting, it can contribute to delivering positive effects for the historic environment. Development is also considered to have the potential to improve access to the Registered Park and Garden which may lead to long term positive effects, and has the potential to link biodiversity recommendations for the site with heritage assets and their settings to deliver synergistic long term positive effects.

Whilst development under Option 3a may reduce the potential for negative effects by reducing the extent of the development such that it does not include the Registered Park and Garden, the scale of growth is still likely to significantly impact upon its setting.

Conclusions

Overall, the scale of proposed growth at each of the sites (including West of Braintree when considering the wider allocation under Options 2a and 2b) will significantly change the historic rural character and setting of these areas, and is therefore likely to have a significant permanent negative effect on the historic environment.

¹¹³ It should be noted that the Heritage Impact Assessment assessed a different site boundary at the West of Braintree option.

¹¹⁴ Donald Insall Associates (2018) Uttlesford Heritage Impact Assessments [online] available at: <https://www.uttlesford.gov.uk/article/4940/Historic-environment>

SA Objective 6: To reduce contributions to climatic change					
	Option 1: North Uttlesford (5000 homes)	Option 2a: West of Braintree (8,500-9,000 dwellings) (1,500 in Uttlesford)	Option 2b: West of Braintree (10,500-11,000 dwellings) (3,500 in Uttlesford)	Option 3a: Easton Park (5000 homes)	Option 3b: Easton Park (10,000 homes)
Rank	2	1	1	2	1
Significant effect?	No	No	No	No	No
Discussion	<p>Development under any of the options has the potential to incorporate renewable or low carbon energy. In this respect, policy provisions will be important to ensure that opportunities for incorporating these as part of any new settlement are not missed. The Renewable Energy Study¹¹⁵ identifies that a high proportion of the households in Uttlesford could employ solar water heating systems, active and passive solar space heating and solar photovoltaics (PV). In larger schemes, large active solar systems can be combined with community heating schemes to support renewable energy and increased energy efficiency. Further to this, the Study identifies potential for community wind energy projects particularly within rural communities, and scope for ground-coupled energy which is identified for the ability to compete economically in rural locations where the only conventional form of heating available is that fuelled by oil or electric storage heaters. There is good scope for development to include such measures to support renewable energy generation and, generally speaking, larger scale development has greater potential to incorporate such measures.</p> <p><i>North Uttlesford</i></p> <p>The North Uttlesford site (Option 1) is located in relatively close proximity to the train station at Great Chesterford; however, this is beyond reasonable walking distance with respect to the majority of the site. The strategic development at the site is considered of a sufficient scale to deliver accessibility and infrastructure improvements (including improved bus services and connections) between the site and a railway station and this would support the use of more sustainable modes of transport; however, ultimately the development of a new settlement will increase the number of private vehicle trips.</p> <p><i>West of Braintree</i></p> <p>The whole site at the West of Braintree (including land within Braintree District) is not located within reasonable walking distance of a railway station, with the closest station located within Braintree town. However, the larger scheme across the whole site is expected to deliver the second phase of the Rapid Transit System (RTS) route which will improve east-west access to the main settlement areas, London Stansted Airport, and the railway infrastructure within Braintree. This is likely to contribute to reducing reliance on the private vehicle; however, ultimately the development of a new settlement will increase the number of private vehicle trips. In regards to the sites within Uttlesford District proposed under Options 2a and 2b – both are considered to perform on par with each other in terms of their performance against this SA objective.</p> <p><i>Easton Park</i></p> <p>The Easton Park site (Options 3a and 3b) is located in relatively close proximity to the train station at Stansted Airport, however, this is considered beyond reasonable walking distance with respect to the majority of the site and development would need to improve bus/ cycle connections to make the station more accessible. The higher growth option (Option 3b) will deliver the first phase of a Rapid Transit System (RTS) which will improve east-west access to London Stansted Airport and Great Dunmow. This may help to reduce reliance on the private vehicle; however, ultimately the development of a new settlement will increase the number of private vehicle trips. However, on balance, the higher growth option (Option 3b) will deliver more in the way of mitigation and benefits and is considered preferable in this respect.</p>				

¹¹⁵ Altechnica (2008) Renewable Energy Study of the District [online] available at: <https://www.uttlesford.gov.uk/article/4937/Environment>

SA Objective 7: Reduce and control pollution					
	Option 1: North Uttlesford (5000 homes)	Option 2a: West of Braintree (8,500-9,000 dwellings) (1,500 in Uttlesford)	Option 2b: West of Braintree (10,500-11,000 dwellings) (3,500 in Uttlesford)	Option 3a: Easton Park (5000 homes)	Option 3b: Easton Park (10,000 homes)
Rank	2	1	1	2	1
Significant effect?	No	No	No	No	No
Discussion	<p>None of the options are located within an Air Quality Management Area (AQMA), and none are within a Poor Air Quality Zone. Despite this, the options all seek to deliver significant development that is highly likely to increase vehicle numbers and trips and emissions in and around the development areas and lead to overall reductions in air quality and increases in noise; with the potential for long term negative effects. It is difficult at this stage to accurately predict the extent of the negative effects, which will ultimately be dependent upon design, layout and provisions to improve accessibility (particularly accessibility to sustainable transport modes). As such, at this stage it is assumed that the larger the scale of growth, the higher the potential for negative effects of greater significance.</p> <p>All of the options have the potential to improve accessibility to nearby railway stations. However, the West of Braintree options (Options 2a and 2b - as part of the wider scheme for the site) and the higher growth option at Easton Park (Option 3b) seek to deliver a Rapid Transit System (RTS) that will improve east-west access between London Stansted Airport and Braintree. The RTS would significantly enhance access to sustainable transport modes with respect to development at both of these sites and support a reduced reliance on the private vehicle (and thus lower emissions associated with development than would otherwise be the case). Overall, whilst higher growth options will potentially have a greater impact on traffic and congestion, they also provide the opportunity for greater self-containment (e.g. in terms of providing services within the development and therefore minimising the need to travel beyond the development site) and the delivery of the RTS. While there is an element of uncertainty at this stage, overall the higher growth options are arguably preferable due to the potential benefits they provide and greater opportunities to mitigate negative effects.</p> <p>Development at the North Uttlesford site (Option 1) is located north of Saffron Walden, and is considered to have the greatest potential to increase traffic flows into/ out of Saffron Walden affecting the AQMA there. On the other hand, one reason for a focus on the delivery of Garden Communities is that they direct development away from the District's main settlements, particularly Saffron Walden, which might otherwise be subject to higher levels of development which could, in turn, further exacerbate existing air quality issues.</p>				

SA Objective 8: To reduce the risk of flooding					
	Option 1: North Uttlesford (5000 homes)	Option 2a: West of Braintree (8,500-9,000 dwellings) (1,500 in Uttlesford)	Option 2b: West of Braintree (10,500-11,000 dwellings) (3,500 in Uttlesford)	Option 3a: Easton Park (5000 homes)	Option 3b: Easton Park (10,000 homes)
Rank	3	4	5	1	2
Significant effect?	No	No	No	No	No
Discussion	<p><i>North Uttlesford</i></p> <p>At the North Uttlesford site (Option 1) there is an area of flood risk (Flood Zones 2 and 3) located along the southern border stretching into the eastern area of the site. A larger area along the southern border, extending further into the eastern and western parts of the site, is also subject to surface water flood risk. The site also lies partially within an area susceptible to groundwater flooding in the west.¹¹⁶</p> <p><i>West of Braintree</i></p> <p>The whole site at West of Braintree (including the land within Braintree District) includes areas subject to areas of fluvial and surface water flood risk. These areas are largely concentrated around the River Ter in the south-west of the site (within Uttlesford District), and around a tributary of the River Ter running centrally through the site, and in the vicinity of the River Brain to the east of the site (within Braintree District). The majority of the site also lies within an area susceptible to groundwater flooding. With regard to the sites that fall within Uttlesford District and feature under Options 2a and 2b, the northern site (featuring within Option 2b only) contains a large area of surface water flood risk extending centrally through the site in a north-south direction. The southern site (featuring under both Options 2a and 2b) contains an area of flood risk (Flood Zones 2 and 3) along the southern border of the site. By developing more land that is constrained by flood risk, Option 2b is considered likely to lead to effects of greater significance than Option 2a.¹¹⁷</p> <p><i>Easton Park</i></p> <p>At Easton Park, the western border of the site is affected by both fluvial and surface water flood risk, and the majority of the site (except for the north-western ‘tip’ of the site and a small area to the south of the site) is also within an area susceptible to groundwater flooding. The fluvial and surface water flood risk areas are largely avoided under Option 3a, which is considered preferable for this reason.¹¹⁸</p> <p><i>Conclusions</i></p> <p>Overall, it is recognised that there are flood risk constraints with respect to each of the options. However, of all of the options; Option 3a is considered to give rise to the lowest risk as it largely avoids areas of fluvial and surface water flood risk. Under the remaining options, it will be important for development to avoid the highest risk areas, and deliver suitable mitigation (including sustainable drainage systems) to ensure that development does not increase flood risk elsewhere. Under the remaining options; mitigation is considered likely to be most effective at the Easton Park site (Option 3b) given that the high risk flood areas are largely concentrated on the site’s border. Given the presence of main rivers on site at the West of Braintree options (Options 2a and 2b), and a greater extent of flood risk areas on site; mitigation may be more difficult/ expensive.</p>				

¹¹⁶ JBA Consulting prepared for Uttlesford District Council (2016) Uttlesford Strategic Flood Risk Assessment. [online] available at: <https://www.uttlesford.gov.uk/article/4937/Environment>

¹¹⁷ Ibid.

¹¹⁸ Ibid.

SA Objective 9: To promote and encourage the use of sustainable methods of travel					
	Option 1: North Uttlesford (5000 homes)	Option 2a: West of Braintree (8,500-9,000 dwellings) (1,500 in Uttlesford)	Option 2b: West of Braintree (10,500-11,000 dwellings) (3,500 in Uttlesford)	Option 3a: Easton Park (5000 homes)	Option 3b: Easton Park (10,000 homes)
Rank	2	1	1	2	1
Significant effect?	No	Yes - Positive	Yes - Positive	No	Yes - Positive
Discussion	<p>All of the Garden Community (GC) options will deliver new services/ facilities to foster a certain degree of self-containment and to minimise the need to travel and it is assumed that larger scale options are more likely to deliver more in terms of services and facilities and therefore self-containment. However; it is also recognised that given the rural nature of the district, new residents are nevertheless likely to look outside of the district to access certain goods and services (e.g. within Cambridge, Bishop's Stortford or Braintree) with the potential for cross-boundary negative effects on traffic, highways infrastructure and parking. None of the GCs are expected to deliver a new railway station and as such will rely on existing infrastructure for sustainable transport options.</p> <p><i>North Uttlesford</i></p> <p>At the North Uttlesford option (Option 1), the closest railway station is located at Great Chesterford. Whilst the south-west corner of the site lies adjacent to the settlement area of Great Chesterford, the majority of the site is not considered to be within reasonable walking distance to the train station. As such, it is considered likely that the scale of growth at Option 1 will lead to negative effects associated with increased traffic and parking issues in the vicinity of the station. To reduce the scale of the potential negative effects, it is recommended that development at Option 1 provides frequent bus connections and cycle routes between the GC and a railway station. This will reduce reliance on the private vehicle and encourage the use of sustainable modes of travel.</p> <p><i>West of Braintree</i></p> <p>The whole site at the West of Braintree (including land within Braintree) is not located within reasonable walking distance of a railway station, with the closest station located within Braintree town. However, the larger scheme across the whole site would be expected to deliver the second phase of the Rapid Transit System (RTS) route which would improve east-west access to the main settlement areas, London Stansted Airport, and railway stations within Braintree. This is considered likely to encourage the use of sustainable transport modes with the potential for significant long term positive effects. National Cycle Route 16 (Flich Way) is also located to the south of the site and, as such, development should seek to enhance cycle connections to this route which provides direct access to Braintree. This will further encourage active travel.</p> <p><i>Easton Park</i></p> <p>With regard to the Easton Park options (Options 3a and 3b), the closest railway station is located at London Stansted Airport, beyond reasonable walking distance with respect to the majority of the site. The higher growth option (Option 3b) involves delivering the first phase of a Rapid Transit System (RTS) which will provide quick and frequent connections between the GC and airport/ railway (and in future phases across the district to connect to Braintree). This is considered likely to support a reduced reliance on the private vehicle and promote the use of sustainable transport modes with the potential for significant long term positive effects. The lower growth option (Option 3a) is less likely to deliver the RTS (and is therefore less preferable in relation to this objective). It would nevertheless be important for development under Option 3a to mitigate the extent of the potential negative effects by providing frequent bus connections and cycle routes between the GC and airport/ railway station.</p> <p><i>Conclusions</i></p> <p>The Infrastructure Delivery Plan (IDP) identifies key infrastructure that will need to be delivered to accommodate the levels of growth proposed through the Local Plan.¹¹⁹ In terms of the growth proposed through the GCs, the IDP identifies that all major growth locations will be required to deliver a package of sustainable transport measures to include bus, walking and</p>				

¹¹⁹ Troy Planning prepared for Uttlesford District Council (2018) Infrastructure Delivery Plan [online] available at: <https://www.uttlesford.gov.uk/article/4942/Infrastructure>

	<p>cycling routes; this will support the mitigation of potential negative effects, and maximise the potential for positive effects with respect to this objective in the long term.</p> <p>Options 2a, 2b and 3b perform better against this SA objective and have the potential for a significant long term positive effect through the delivery of a RTS, which would promote and encourage the use of sustainable transport modes.</p>
--	---

SA Objective 10: To ensure accessibility to services					
	Option 1: North Uttlesford (5000 homes)	Option 2a: West of Braintree (8,500-9,000 dwellings) (1,500 in Uttlesford)	Option 2b: West of Braintree (10,500-11,000 dwellings) (3,500 in Uttlesford)	Option 3a: Easton Park (5000 homes)	Option 3b: Easton Park (10,000 homes)
Rank	3	1	1	2	1
Significant effect?	No	Yes - Positive	Yes - Positive	No	Yes - Positive
Discussion	<p>All of the Garden Community (GC) options will deliver new services/ facilities to foster a degree of self-containment and help to minimise the need to travel and it is assumed that larger scale options are more likely to deliver more in terms of services and facilities and therefore self-containment.</p> <p><i>North Uttlesford</i></p> <p>Option 1 is located relatively close to Great Chesterford; however, the services and facilities available at Great Chesterford are limited to a primary school and medical centre, which are likely to be subject to significant capacity constraints should they need to accommodate the level of growth proposed through the GC. It will therefore be important for the GC to deliver new provisions and/ or contribute to upgrading the facilities that exist in the area.</p> <p><i>West of Braintree</i></p> <p>The site at the West of Braintree (Options 2a and 2b and including the land within Braintree District) is not located in close proximity to any of the main settlements within Uttlesford District, and is more closely connected with Braintree town (outside of the district boundary). As a large town, Braintree is likely to support future growth at the site through providing good access to a wider range of services and facilities and its town centre offer. The delivery of the second phase of the Rapid Transit System (RTS) will also enhance the east-west connections between London Stansted Airport and Braintree to support accessibility and social inclusion in this respect; with the potential for significant long term positive effects.</p> <p><i>Easton Park</i></p> <p>The site at Easton Park (Options 3a and 3b) is likely to provide new services and facilities on site, and is located in relatively close proximity to Great Dunmow and, as a Market Town (the highest in the District's settlement hierarchy) this settlement provides access to health facilities and two primary schools, as well as a range of shops and services located within the Town Centre. The higher growth option also seeks to deliver the first phase of a Rapid Transit System (RTS) which will improve accessibility between Great Dunmow and Stansted Airport with the potential for significant long term positive effects in this respect. And as such, Option 3b is considered preferable to Option 3a (which is less likely to deliver the RTS).</p> <p><i>Conclusions</i></p> <p>Overall however, it is recognised that given the rural nature of the district, new residents are still likely to look outside of the district to access a wider range of goods and services (e.g. within Cambridge, Bishop's Stortford or Braintree) with the potential for cross-boundary effects on town centres, traffic, highways infrastructure and parking.</p>				

SA Objective 11: To improve the population's health and promote social inclusion					
	Option 1: North Uttlesford (5000 homes)	Option 2a: West of Braintree (8,500-9,000 dwellings) (1,500 in Uttlesford)	Option 2b: West of Braintree (10,500-11,000 dwellings) (3,500 in Uttlesford)	Option 3a: Easton Park (5000 homes)	Option 3b: Easton Park (10,000 homes)
Rank	3	1	1	2	1
Significant effect?	No	No	No	No	No
Discussion	<p>Commentary:</p> <p>Development at the North Uttlesford site (Option 1) would be located in relatively close proximity to existing health facilities at Great Chesterford. Similarly, development at the Easton Park site (Options 3a and 3b) is also located in relatively close proximity to existing health facilities at Great Dunmow. Development at West of Braintree is likely to rely on Braintree town for a wider range of health facilities as it is less connected to the main settlement areas within Uttlesford District. The capacity of existing facilities to support new residents is unknown at this stage, but large scale development is likely to put considerable pressure on existing services and facilities which may lead to negative effects in terms of health care provisions. However, development at the GCs is considered of a sufficient scale to contribute to enhancements to, or deliver new facilities to address the potential negative effects. The delivery of the proposed Rapid Transit System (RTS) under Options 2a, 2b and 3b is also considered likely to improve access to the between the Garden Communities, Braintree, Great Dunmow and Stansted Airport.</p> <p>It is assumed that development through any of the options will deliver sufficient open and green space to meet the needs of new residents.</p> <p>It is also recognised that Options 2a, 2b, 3a and 3b have the potential to connect to a National Cycle Route and promote opportunities for active travel in this respect; supporting resident health with the potential for minor long term positive effects.</p>				

SA Objective 12: To provide appropriate housing and accommodation to meet existing and future needs					
	Option 1: North Uttlesford (5000 homes)	Option 2a: West of Braintree (8,500-9,000 dwellings) (1,500 in Uttlesford)	Option 2b: West of Braintree (10,500-11,000 dwellings) (3,500 in Uttlesford)	Option 3a: Easton Park (5000 homes)	Option 3b: Easton Park (10,000 homes)
Rank	2	4	3	2	1
Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive	Yes - Positive	Yes - Positive
Discussion	<p>Each option will deliver a significant number of new homes (including a mix of types, sizes and tenures, including a proportion of affordable housing) to meet existing and future housing needs; with the potential for significant long term positive effects in this respect. As the number of homes being delivered increases, the significance of the positive effect also increases.</p> <p>Research indicates that housing sites with a larger proportion of affordable homes deliver more quickly, where viable. For both large and small-scale sites, developments with 40% or more affordable housing have a build rate that is around 40% higher compared to developments with 10-19% affordable housing obligation.¹²⁰</p> <p>Options 2a and 2b are less preferred as they deliver a lower quantum of housing growth within Uttlesford District.</p>				

¹²⁰ Nathaniel Lichfield & Partners (2016) Start to Finish: How Quickly do Large-Scale Housing Sites Deliver? [online] available at: <https://lichfields.uk/media/1728/start-to-finish.pdf>

SA Objective 13: To promote the efficient use of resources, including land and ensure the necessary infrastructure to support sustainable development					
	Option 1: North Uttlesford (5000 homes)	Option 2a: West of Braintree (8,500-9,000 dwellings) (1,500 in Uttlesford)	Option 2b: West of Braintree (10,500-11,000 dwellings) (3,500 in Uttlesford)	Option 3a: Easton Park (5000 homes)	Option 3b: Easton Park (10,000 homes)
Rank	2	1	1	2	1
Significant effect?	No	Yes - Positive	Yes - Positive	No	Yes - Positive
Discussion	<p>In terms of the efficient use of natural resources; all of the GC options will result in development on greenfield land with the potential for minor negative effects in this respect – the significance of which increases as site size increases. The site at North Uttlesford (Option 1) is partially located within a chalk Minerals Safeguarding Site, the sites within Uttlesford District at West of Braintree (featured in Options 2a and 2b) are both located wholly within a sand and gravel Minerals Safeguarding Site, and the Easton Park site (Options 3a and 3b) is located partially (over 50%) within a sand and gravel Minerals Safeguarding Site. All options therefore are considered to have the potential to contribute to the sterilisation of mineral resources; with the potential for minor long term negative effects. It is also recognised that chalk resources are only found in the north of the district and supply potential is therefore more limited in this respect; indicating that the effects of development at the North Uttlesford site (Option 1) may be of more significance.</p> <p>5,000 new homes is defined as the minimum threshold for development to be considered as a Garden Community; and this figure has been identified by the Council through the consideration of the minimum level of development required to deliver the necessary infrastructure to facilitate development. As such, development at all of the options is considered likely to deliver infrastructure improvements to address existing and future constraints with the potential for at least residual neutral effects. It is also considered that the higher the level of development, the more likely it is that development will secure and deliver the new provisions.</p> <p>Notably, the higher growth option proposed at Easton Park (Option 3b) seeks to deliver the first phase of a new Rapid Transit System (RTS), and the West of Braintree (larger site to include the land within Braintree District) seeks to deliver the second phase of the RTS; which will overall deliver significant infrastructure improvements between London Stansted Airport, the southern GCs, and the main settlements of Great Dunmow and Braintree, with the potential for significant long term positive effects.</p>				

SA Objective 14: To improve the education and skills of the population					
	Option 1: North Uttlesford (5000 homes)	Option 2a: West of Braintree (8,500-9,000 dwellings) (1,500 in Uttlesford)	Option 2b: West of Braintree (10,500-11,000 dwellings) (3,500 in Uttlesford)	Option 3a: Easton Park (5000 homes)	Option 3b: Easton Park (10,000 homes)
Rank	4	3	1	4	2
Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive	Yes - Positive	Yes - Positive
Discussion	<p>The delivery of mixed-use development at any of the options is considered likely to deliver employment opportunities to support a varied employment skills base with the potential for minor long term positive effects.</p> <p>5,000 new homes is defined as the minimum threshold for development to be considered as a Garden Community; and this figure has been identified by the Council through the consideration of the minimum level of development required to deliver the necessary infrastructure improvements to facilitate development, which, of particular relevance, includes the provision of a new secondary school. As such, development at all of the options (and considering the West of Braintree site as a whole) is considered likely to deliver new educational facilities to address existing and future needs, with the potential for significant positive effects. It is also considered that the higher the level of development, the more likely it is that development will secure and deliver the new provisions.</p>				

SA Objective 15: To ensure sustainable employment provision and economic growth					
	Option 1: North Uttlesford (5000 homes)	Option 2a: West of Braintree (8,500-9,000 dwellings) (1,500 in Uttlesford)	Option 2b: West of Braintree (10,500-11,000 dwellings) (3,500 in Uttlesford)	Option 3a: Easton Park (5000 homes)	Option 3b: Easton Park (10,000 homes)
Rank	4	3	2	4	1
Significant effect?	No	No	No	No	No
Discussion	<p>All of the options are expected to deliver new employment opportunities as part of mixed-use development that supports self-containment (to a certain degree) and reduces the need to travel; with the potential for minor long term positive effects. The larger the scale of development, the greater the employment opportunity provisions are likely to be, and as such, the higher growth options are considered likely to deliver positive effects of greater significance.</p> <p>Mixed-use development is also considered likely to support small businesses to grow, with the potential for minor long term positive effects.</p> <p>Overall, the delivery of Garden Communities is considered less likely to enhance the viability of existing town and local centres, given the locations outside of existing settlements. However, given the proximity of the Easton Park site (Options 3a and 3b) to Great Dunmow, development at this site has the potential to support the vitality of Great Dunmow town centre. Whilst development at any of the option locations will be outside of existing settlement areas, it is considered that this also has the potential to support the rural economy and rural diversification; with the potential for minor long term positive effects in this respect.</p> <p>Development under Options 1, 2a, 2b and 3a will not lead to the loss of any existing employment areas. However, the site proposed under Option 3b contains Highwood Quarry. It is expected that phasing of development should allow quarry operations to complete before development occurs in this area of the site.</p>				

Takeley growth options

Within the main report, Chapter 8 explains how the growth options for Takeley Village were identified. The options are presented in the table below.

Option		Delivery during the plan period (up to 2033)
Option 1: North Takeley	SLAA sites 08Tak15, 09Tak15, 10Tak15 & 11Tak15	750 dwellings
Option 2: South Takeley	SLAA sites 03HBO15 & 04GtCan15	486 dwellings

Appraisal findings for the Takeley growth options

A comparative appraisal of the options was carried out under each SA Objective. The findings are presented in the tables below.

SA Objective 1: To conserve and enhance biodiversity (habitats, species and ecosystems) within the district		
	Option 1: 750 dwellings in the north of Takeley Village (08Tak15, 09Tak15, 10Tak15, 11Tak15)	Option 2: 486 dwellings in the south of Takeley Village (03HBO15 & 04GtCan15)
Rank	2	1
Significant effect?	Yes - Negative	Yes - Negative
Discussion	<p>Takeley Village contains BAP Priority Habitats of Deciduous Woodland within and surrounding the settlement; there is also an Ancient Woodland located to the north. In the wider setting the village is surrounded by three SSSIs: Hatfield Forest to the west, Elsenham Woods to the north and High Wood, Dunmow in the east, and the whole of the settlement falls within the associated SSSI Impact Risk Zones (IRZs). Under the SSSI IRZs; housing development in the settlement is unlikely to require any further consultation with Natural England, but any associated transport proposals in the west of the settlement will require further consultation. None of the site options contain any identified Priority Habitats.</p> <p>Growth under either of the options is likely to increase traffic on the B1256, particularly to the west (which is just north of Hatfield Forest SSSI) which will provide resident access to the M11 and A120, and this is likely to have impacts on air quality at Hatfield Forest SSSI. Given the close proximity of the Forest to the settlement, it is also likely to be subject to increased recreational pressures. The higher the level of growth at Takeley, the greater the impacts are likely to be, and, as such, Option 1 is considered likely to lead to negative effects of greater significance than Option 2.</p> <p>In line with advice from Natural England, it is recommended that Local Plan policy provisions seek contributions towards the delivery of mitigation measures to address the likely impacts of recreational disturbance and decreased air quality at Hatfield Forest from all development falling within the emerging Zone of Influence (ZoI) - which will include the development at Takeley.</p> <p>Option 1 includes site 08Tak15 and there is an Ancient Woodland adjacent to the site in the north. Any development at this site would need to include an appropriate buffer between the woodland and development. There is the potential for minor negative effects as a result of increased recreation at the Ancient Woodland, although it is not clear if there is currently public access onto the Ancient Woodland at this stage.</p> <p>It is considered that biodiversity could potentially be enhanced under each of the options through strong Local Plan policies on biodiversity net gain; however, this is uncertain at this stage.</p>	

SA Objective 2: To conserve and enhance water quality and resources and help achieve the objectives of the Water Framework Directive		
	Option 1: 750 dwellings in the north of Takeley Village (08Tak15, 09Tak15, 10Tak15, 11Tak15)	Option 2: 486 dwellings in the south of Takeley Village (03HBO15 & 04GtCan15)
Rank	=	=
Significant effect?	No	No
Discussion	<p>Pincey Brook flows into Takeley Village from the north west; however, this is not located within or adjacent to any of the sites under the growth options. Therefore, neither option is considered likely to lead to any significant negative effects on Rivers in the plan area. The village is also not located within a Groundwater Source Protection Zone. As such, development under either of the growth options proposed for Takeley Village are not considered likely to lead to any significant effects on water quality within the Plan area.</p> <p>Given the scale of growth proposed through the options and legal requirements in place for Water Resource Management Plans, it is considered unlikely that either of these options will lead to any significant effects on water resources. In line with the Water Cycle Study (WCS) recommendations, Local Plan policies should encourage the conservation of water in new dwellings and commercial properties to minimise negative effects on water resources. It is expected that development under any of the Takeley Village growth options can deliver mitigation (for example rainwater harvesting measures) to support reduced water use per person per day.</p> <p>The WCS has also assessed the impact of growth at the Market Towns and Key Villages within the District. While the study considered a lower growth scenario at Takeley Village (an increase of 47 dwellings), it found overall, that there are limited constraints associated with development in the Town and Key Villages, with the existing Water Recycling Centres having the capacity to accommodate increased flows, with future investment and planning by the operating sewerage company. Both options propose higher levels of growth within Takeley than was assessed in the WCS - and, as such, may require further assessment in terms of waste water capacity and infrastructure requirements. However; given the overall findings, it is considered unlikely that either of the growth options will lead to any significant negative effects or that there are any significant differences.</p>	

SA Objective 3: To conserve and enhance the district's landscape character and townscapes		
	Option 1: 750 dwellings in the north of Takeley Village (08Tak15, 09Tak15, 10Tak15, 11Tak15)	Option 2: 486 dwellings in the south of Takeley Village (03HBO15 & 04GtCan15)
Rank	2	1
Significant effect?	Yes - Negative	Yes - Negative
Discussion	<p>Takeley Village lies wholly within the Broxton Farmland Plateau Landscape Character Area (LCA), and landscape guidelines for this LCA¹²¹ include; strengthening and enhancement of hedgerows; conserving and managing areas of ancient and semi-natural woodland; and conserving historic lanes. The northern half of Takeley Village also lies within the Countryside Protection Zone (CPZ); an area of land designated in the Local Plan where development is restricted to avoid coalescence with London Stansted Airport, and to retain the open character of the zone.</p> <p>The introduction of development in previously undeveloped areas will ultimately lead to long term negative effects on the landscape/ townscape. While the full extent of the component sites would not be developed under Option 1, it is assumed that the higher level of growth would result in the loss of more greenfield/ agricultural land therefore affect the landscape character to a greater degree compared to Option 2. The A120 to the north forms a barrier to further growth but development within the CPZ does expand the settlement bringing it closer to Stansted Airport.</p> <p>Development to the south would extend the settlement up to the boundary of the existing Mobile Home Park along Station Road (B183). While it is expected that development would not expand beyond this point it will still lead to the loss of greenfield/ agricultural land and have impacts on the landscape character and townscape in the south of the village.</p> <p>It is difficult to identify any significant differences between the options at stage; the nature and significance of the effects are uncertain at this stage and dependent on the design and layout of development and the implementation of mitigation measures. The higher level of growth proposed under Option 1 is considered more likely to result in a negative effect of significance compared to Option 2. As a result Option 2 is preferred in relation to this SA Objective.</p> <p>Given the scale of growth proposed under both options at a village, it is considered that they are both likely to result in a residual significant negative effect on the character of the settlement.</p>	

¹²¹ Chris Blandford Associates (2006) Landscape Character Assessment [online] available at: <https://www.uttlesford.gov.uk/article/4937/Environment> [accessed 30/11/18]

SA Objective 4: To conserve and enhance soil and contribute to the sustainable use of land		
	Option 1: 750 dwellings in the north of Takeley Village (08Tak15, 09Tak15, 10Tak15, 11Tak15)	Option 2: 486 dwellings in the south of Takeley Village (03HBO15 & 04GtCan15)
Rank	2	1
Significant effect?	Yes - Negative	Yes - Negative
Discussion	The whole village is identified as containing high quality agricultural land resources (Grade 2 Best and Most Versatile (BMV) agricultural land). Any development in the village is likely to result in the loss of high quality soil resources with the potential for permanent negative effects, and the higher growth option (Option 1), by increasing land take, is likely to lead to negative effects of greater significance than the lower growth option (Option 2).	

SA Objective 5: To maintain and enhance the district's cultural heritage assets and their settings		
	Option 1: 750 dwellings in the north of Takeley Village (08Tak15, 09Tak15, 10Tak15, 11Tak15)	Option 2: 486 dwellings in the south of Takeley Village (03HBO15 & 04GtCan15)
Rank	2	1
Significant effect?	Yes - Negative	Yes - Negative
Discussion	<p>Takeley Village contains a number of Grade II Listed Buildings within the settlement area, and a Scheduled Monument and Grade I Listed Building north of the settlement at Warish Hall. The B1256 is also a Roman Road.</p> <p>None of the sites under the options contain any of the designated heritage assets identified above, however; the sites under Option 1 will develop the area east of and adjacent to Warish Hall Scheduled Monument. Historic England's record of the Scheduled Monument¹²² (Warish Hall moated site) identifies the site as St Valery's Priory, Takeley - a Benedictine priory founded in 1066-1086, which remains essentially undisturbed and will retain important archaeological information pertaining to the occupation and development of Takeley Priory from its original foundation by William the Conqueror until the modern period. The reasons for designation identify that '<i>Benedictine monasteries made a major contribution to many facets of medieval life and all examples exhibiting significant surviving archaeological remains are worthy of protection.</i>' The internal moat is now occupied by Warish Hall - a Grade I Listed Building dating from the late 13th century. Whilst development under Option 1 is unlikely to lead to any significant effects on the adjacent archaeological remains - the delivery of 750 dwellings in this area is likely to significantly affect the rural setting of the Grade I Warish Hall. Areas of existing woodland/ trees around the Listed Building are likely to provide a buffer/ screening to some extent, and the overall effects are considered to be dependent on the delivery of high quality and responsive design and layout, and effective mitigation measures such as screening. Development also has the potential for minor positive effects as a result of increased access and awareness.</p> <p>The sites under Option 2 are also located in close proximity to Grade II Listed Buildings at Great Canfield Park and Bonningtons, and the delivery of 486 dwellings across these sites is considered to have the potential to significantly affect the setting of the Listed Buildings. Again existing woodland/ trees provide some screening, but the potential effects (and significance of these effects) will ultimately be dependent on the delivery of high quality and responsive design and layout and effective mitigation measures such as screening.</p> <p>Overall, whilst both options are considered likely to have impacts on the setting of designated heritage assets at the settlement; given that Option 1 is likely to have impacts on a Grade I Listed Building (rarer and more significant than Grade II Listed Buildings) and development is at a larger scale, the likely effects are considered to be of greater significance compared to Option 2.</p>	

¹²² Historic England (2018) National Heritage List for England – Warish Hall moated site and remains of Takeley Priory [online] available at: <https://historicengland.org.uk/listing/the-list/list-entry/1007834> [accessed 29/11/18]

SA Objective 6: To reduce contributions to climatic change		
	Option 1: 750 dwellings in the north of Takeley Village (08Tak15, 09Tak15, 10Tak15, 11Tak15)	Option 2: 486 dwellings in the south of Takeley Village (03HBO15 & 04GtCan15)
Rank	1	2
Significant effect?	No	No
Discussion	<p>It is considered that development through either of the options has the potential to incorporate renewable or low carbon energy. In this respect, policy provisions will be important to ensure that opportunities for incorporating these as part of new development are not missed.</p> <p>Takeley Village does not contain a train station with the closest located beyond reasonable walking distance at Stansted Airport. There are hourly bus services between Takeley and Stansted Airport which connect the settlement to the rail station there. Whilst there are limited service and facility provisions within Takeley; the hourly bus services also provide access to Great Dunmow and the wider range of services and facilities available outside of the district at Bishop's Stortford.</p> <p>There is the potential for development through either of the options to provide financial contributions that might improve the existing bus services that pass through or bus stops in the village. However, the scale of improvements is uncertain at this stage.</p> <p>The scale of growth under Option 1 is sufficient to deliver a new primary school for the village, which will help to reduce vehicle trips to some extent. However, pupils will still need to travel outside of the settlement to access a secondary school. There are only limited services/ facilities on offer within the village; as a result residents will still need to travel to larger settlements in order to access a wider range of services/ facilities.</p> <p>Option 1 is preferred as while it proposes a higher level of growth it provides the opportunity to deliver a new primary school for the village. Neither of the options are considered likely to have a significant effect against this SA Objective.</p>	

SA Objective 7: Reduce and control pollution		
	Option 1: 750 dwellings in the north of Takeley Village (08Tak15, 09Tak15, 10Tak15, 11Tak15)	Option 2: 486 dwellings in the south of Takeley Village (03HBO15 & 04GtCan15)
Rank	2	1
Significant effect?	Yes - Negative	Yes - Negative
Discussion	<p>The Transport Study predicted that, without mitigation, the capacity of the B1256 will be exceeded at 2033 without development proposed through the Local Plan. Both of the options will increase traffic along the B1256 and at Junction 8 of the M11 in order to access the motorway and the A120. There is identified congestion in these areas and this is likely to impact air quality.</p> <p>The higher level of growth proposed under Option 1 is likely to have a negative effect of greater significance on traffic and therefore atmospheric pollution compared to Option 2. As a result Option 2 is preferred; however, it should be noted that the difference between the options is not significant.</p>	

SA Objective 8: To reduce the risk of flooding		
	Option 1: 750 dwellings in the north of Takeley Village (08Tak15, 09Tak15, 10Tak15, 11Tak15)	Option 2: 486 dwellings in the south of Takeley Village (03HBO15 & 04GtCan15)
Rank	2	1
Significant effect?	No	No
Discussion	<p>None of the sites under the options are located within an area at risk of fluvial flooding. All of the sites however contain areas at risk of surface water flooding, and this is most prominent at the sites under Option 1 in the north east of the village. It will important for development under both of the options to incorporate sustainable drainage systems.</p> <p>The eastern and western extremities of the village are also located within areas identified in the SFRA as being susceptible to groundwater flooding, which again, are most prominent within Option 1. Given the greater extent of flood risk areas within Option 1, Option 2 is considered to perform better against this SA Objective. However, given potential mitigation available at the project level (including the application of sustainable drainage systems) neither option is considered likely to lead to any significant negative effects.</p>	

SA Objective 9: To promote and encourage the use of sustainable methods of travel		
	Option 1: 750 dwellings in the north of Takeley Village (08Tak15, 09Tak15, 10Tak15, 11Tak15)	Option 2: 486 dwellings in the south of Takeley Village (03HBO15 & 04GtCan15)
Rank	1	2
Significant effect?	No	No
Discussion	<p>Takeley Village does not contain a train station the closest is located beyond reasonable walking distance at Stansted Airport. There are existing hourly bus services between Takeley and Stansted Airport connecting the settlement with the railway station there. Flich Way (National Cycle Route 16) also runs through the settlement offering an off-road cycle route just south of the B1256 and providing good access to opportunities for active travel.</p> <p>Whilst there are limited service and facility provisions within the settlement; the hourly bus services also provides access to Great Dunmow and the wider range of services and facilities available outside of the district at Bishop's Stortford.</p> <p>There is the potential for development through either of the options to provide financial contributions that might improve the existing bus services that pass through or bus stops in the village. However, the scale of improvements is uncertain at this stage.</p> <p>The scale of growth under Option 1 is sufficient to deliver a new primary school for the village, which should be accessible by sustainable transport modes. However, pupils will still need to travel outside of the settlement to access a secondary school. There are only limited services/ facilities on offer within the village; as a result residents will still need to travel to larger settlements in order to access a wider range of services/ facilities.</p> <p>Option 1 is preferred as while it proposes a higher level of growth it provides the opportunity to deliver a new primary school for the village that can be accessed using sustainable transport modes. Neither of the options are considered likely to have a significant effect against this SA Objective.</p>	

SA Objective 10: To ensure accessibility to services		
	Option 1: 750 dwellings in the north of Takeley Village (08Tak15, 09Tak15, 10Tak15, 11Tak15)	Option 2: 486 dwellings in the south of Takeley Village (03HBO15 & 04GtCan15)
Rank	1	2
Significant effect?	No	No
Discussion	<p>Whilst there are limited service and facility provisions within the settlement there is an hourly bus services along the B1256 that provides access to Great Dunmow and to the wider range of services and facilities available outside of the district at Bishop's Stortford.</p> <p>There is the potential for development through either of the options to provide financial contributions that might improve the existing bus services that pass through or bus stops in the village. However, the scale of improvements is uncertain at this stage.</p> <p>The scale of growth proposed under Option 1 provides an opportunity to provide a new primary school. However, it is also likely to increase pressure on the limited service and facility provision within the settlement. Option 2 will also increase pressure on these services/ facilities but to a lesser degree. New residents will still need to travel by bus or the private vehicle to access a wider range of services/ facilities at the larger settlements.</p> <p>As a result, neither of the options is considered likely to have a significant positive effect. Option 1 is preferred as the scale of growth has the potential to deliver a primary school.</p>	

SA Objective 11: To improve the population's health and promote social inclusion		
	Option 1: 750 dwellings in the north of Takeley Village (08Tak15, 09Tak15, 10Tak15, 11Tak15)	Option 2: 486 dwellings in the south of Takeley Village (03HBO15 & 04GtCan15)
Rank	=	=
Significant effect?	No	No
Discussion	<p>There are no existing health or medical centres within the village of Takeley, residents rely on the facilities provided in Great Dunmow or Bishop's Stortford.</p> <p>Given the scale of growth neither of the options are likely to provide a new health centre/ facility for the village. New residents will need to rely on the facilities provided within Great Dunmow and Bishop's Stortford. While the higher level of growth proposed under Option 1 is likely to put greater pressure on existing facilities compared to Option 2, it is not clear at this stage whether this would be significant.</p> <p>There are a number of existing natural/ open spaces within the village that will support new residents with good access to recreational space. Development under both of the options is also considered to be of a sufficient scale to deliver new open/ green spaces to support the growth of the village.</p>	

SA Objective 12: To provide appropriate housing and accommodation to meet existing and future needs		
	Option 1: 750 dwellings in the north of Takeley Village (08Tak15, 09Tak15, 10Tak15, 11Tak15)	Option 2: 486 dwellings in the south of Takeley Village (03HBO15 & 04GtCan15)
Rank	1	2
Significant effect?	Yes - Positive	Yes - Positive
Discussion	Each option will deliver new homes (including a mix of types and tenures to include a proportion of affordable housing) to meet existing and future housing needs; with the potential for significant long term positive effects in this respect. It is considered that as the number of homes being delivered increases, so does the significance of the positive effects. Option 1 is therefore preferred.	

SA Objective 13: To promote the efficient use of resources, including land and ensure the necessary infrastructure to support sustainable development		
	Option 1: 750 dwellings in the north of Takeley Village (08Tak15, 09Tak15, 10Tak15, 11Tak15)	Option 2: 486 dwellings in the south of Takeley Village (03HBO15 & 04GtCan15)
Rank	=	=
Significant effect?	No	No
Discussion	<p>All of the sites promoted through the options are greenfield sites which would be largely lost to development with the potential for negative effects in terms of efficient land use. The higher growth option (Option 1) is considered likely to have a negative effect of greater significance than the lower growth option (Option 2) due to the higher levels of land take involved.</p> <p>There are areas of land under both options that lie within a sand and gravel Minerals Safeguarding Site; and as such, both options have the potential to contribute to the sterilisation of mineral resources leading to long term minor negative effects on natural resources. A greater area of land lying within this Safeguarding area occurs under Option 1, and as such, Option 1 is considered likely to lead to negative effects of greater significance.</p> <p>Both of the options will increase pressure on existing physical and social infrastructure within the village and at the larger settlements of Great Dunmow and Bishop's Stortford. The higher level of growth proposed under Option 1 is likely to have greater pressure on this infrastructure; however, it also offers an opportunity to provide a new primary school for the village.</p> <p>On balance, it is considered that there are no significant differences between these options against this SA Objective.</p>	

SA Objective 14: To improve the education and skills of the population		
	Option 1: 750 dwellings in the north of Takeley Village (08Tak15, 09Tak15, 10Tak15, 11Tak15)	Option 2: 486 dwellings in the south of Takeley Village (03HBO15 & 04GtCan15)
Rank	1	2
Significant effect?	Yes - Positive	No
Discussion	<p>There is an identified need for improved educational facilities to accommodate growth in Takeley village, and Option would deliver a sufficient scale to provide this (a new primary school) with the potential for significant long term positive effects. As such, the Option 1 is considered to perform better against this SA objective compared to Option 2.</p> <p>It should be noted that pupils will still need to travel outside of the village in order to access a secondary school.</p>	

SA Objective 15: To ensure sustainable employment provision and economic growth		
	Option 1: 750 dwellings in the north of Takeley Village (08Tak15, 09Tak15, 10Tak15, 11Tak15)	Option 2: 486 dwellings in the south of Takeley Village (03HBO15 & 04GtCan15)
Rank	=	=
Significant effect?	No	No
Discussion	Neither of the options is proposing to deliver any new employment land, and development under either option will not lead to the loss of existing employment land. As such, neither option is considered likely to lead to any significant effects against this SA objective. Any development within Takeley however, has the potential to support the vitality and viability of Great Dunmow Town Centre, which residents are likely to rely upon to meet their day to day service/ facility and shopping needs.	

Spatial strategy options

Within the main report, Chapter 8 explains how spatial strategy options were developed and identified. The spatial strategy options are presented in the table on the next page.

The reasonable spatial strategy alternatives

	Option 1: Preferred option	Option 2a: Reduced reliance on GCs greater focus on Towns / Key Villages (with a train station)	Option 2b: Reduced reliance on GCs greater focus on other Villages	Option 3: No Garden Communities
Constants				
Completions (April 2018)	4,156	4,156	4,156	4,156
Permissions (April 2018)	3,364	3,364	3,364	3,364
Windfall (2018/19 - 2032/33)	1,050	1,050	1,050	1,050
Constants Total	8,570	8,570	8,570	8,570
Choices				
Towns				
Edge of Bishop's Stortford	0	530	0	530
Saffron Walden	315	515	315	515
Great Dunmow	767	882	767	1,882
Town Total	1,082	1,927	1,082	2,927
Villages				
Elsenham	170	660	170	660
Great Chesterford	0	300	0	300
Hatfield Heath	0	0	26	26
Newport	94	200	94	200
Stanstead Mountfitchet	40	345	40	345
Takeley	20	20	770	770
Thaxted	20	20	68	68
A and B Villages	134	134	975	975
Village Total	478	1,679	2,143	3,344
Garden Communities				
Easton Park	1,925	1,125	1,125	0
North Uttlesford	1,925	1,125	1,125	0
West of Braintree	970	520	520	0
Garden Communities Total (up to 2033)	4,820	2,770	2,770	0
Total dwellings during the plan period	14,950	14,946	14,565	14,841
% over OAHN (14,000 dwellings)	7%	7%	4%	6%

Appraisal findings for the spatial strategy options

A comparative appraisal of the options was carried out under each SA Objective. The findings are presented in the tables below.

SA Objective 1: To conserve and enhance biodiversity (habitats, species and ecosystems) within the district				
	Option 1: Preferred Option	Option 2a: Less at GCs more at Towns/ Villages (with a train station)	Option 2b: Less at GCs more at other Villages	Option 3: No Garden Communities
Rank	1	2	3	4
Significant effect?	No	No	Yes - Negative	Yes - Negative
Discussion	<p>All of the options will result in localised impacts on biodiversity where development is focussed as a result of the loss and fragmentation of habitats as well as increased disturbance (noise, light and recreation) to habitats/ species. For Option 1 these impacts will be mainly focussed on biodiversity within and surrounding the GCs, whereas Option 3 will have greater impacts on biodiversity surrounding existing towns and villages. Options 2a and 2b are a mixture of Options 1 and 3. During the plan period the key differences between Options 2a and 2b relate to the loss/ fragmentation of habitats as well as disturbance (noise, light and recreation) to habitats and species around certain towns and villages. While the GCs would deliver less growth during the life of the plan the total capacity would still be delivered post plan period. As a result they would have similar effects in the longer-term even with reduced delivery during this plan period.</p> <p>A key issue for consideration when considering the differences between the spatial strategy options in terms of impacts on biodiversity is Hatfield Forest SSSI. Natural England (NE) raised two key issues that need to be addressed in relation to development proposed in the emerging Local Plan. This includes potential cumulative impacts with other plans, through increased atmospheric pollution and recreational pressure to Epping Forest Site of SSSI and Special SAC and Hatfield Forest SSSI. Uttlesford District falls outside the 6.2km zone of influence for recreational pressure impacts to Epping Forest SAC and SSSI so NE is satisfied that this issue can be screened out for the emerging Local Plan. The issue of increased atmospheric pollution to the Epping Forest SAC and therefore the SSSI is being addressed through the HRA process for the Local Plan.</p> <p>The National Trust, who own and manage Hatfield Forest SSSI and National Nature Reserve (NNR), commissioned visitor surveys that demonstrate that there is unsustainable recreational pressure, in the winter months, which is damaging parts of Hatfield Forest. Further visitor surveys have been carried out this year to assess the use of the site during summer months; however, the findings of this additional work is not yet available. The findings of the winter visitor survey show a zone of influence for recreational pressure of 10.4 km radius from the site, and this zone may extend further once the summer visitor surveys have been analysed. Natural England advises that the Uttlesford Local Plan should include policy requirements for development within the Zol (once fully defined) to provide a contribution towards delivery of appropriate mitigation measures, once agreed.</p> <p>Taking the above into account, it is reasonable to assume that the spatial strategy options which direct a higher level of growth within the emerging Zol are more likely to have impacts at Hatfield Forest SSSI in terms of increased recreational pressure. This is an issue for additional growth proposed at a number of settlements (edge of Bishop's Stortford, Great Dunmow, Stansted Mountfitchet, Elsenham, Takeley, Hatfield Heath and Little Dunmow) and Easton Park GC. If the Zol were to be expanded following consideration of the additional visitor surveys then other settlements may be included - such as Saffron Walden, Newport and Thaxted - as well as the West of Braintree GC.</p> <p>Options 1, 2a and 2b all include the delivery of the Easton park GC. Despite differences in the delivery of growth during the plan period all of these options will ultimately deliver the total capacity of 10,000 new dwellings. Options 2a and 2b include additional growth at the towns and villages within the emerging Zol to reflect reduced reliance on GCs during the plan period. They are therefore more likely to increase recreational pressure at Hatfield Forest SSSI during the plan period.</p>			

	<p>Option 3 proposes the highest level of growth at the towns and settlements that fall within the emerging Zol. It is therefore likely to result in the greatest impact in terms of increased recreational pressure during the plan period. While there are uncertainties in terms of potential impacts post plan period, it could be argued that the delivery of the Easton Park GC would in the long term have a greater impact on the SSSI given the scale of development. However, the scale of development provides opportunities to deliver significant alternative areas for recreational activity and this includes the provision of a Country Park. The delivery of smaller scale development on the edge of existing towns and villages are unlikely to deliver a similar scale of mitigation although it is recognised that all the developments could contribute financially to the creation of suitable alternative areas for recreation.</p> <p>On balance, it is considered that Option 1 is the least likely to have impacts on the Hatfield Forest SSSI as a result of increased recreation during the plan period as it directs less growth to within the emerging Zol. Options 2a and 2b propose a similar level of additional growth within the emerging Zol and Option 3 proposes the greatest level of growth within the Zol during the plan period and so is less preferred.</p> <p>In terms of increased atmospheric pollution at Hatfield Forest SSSI, this is most likely to arise as a result increased traffic on the B1256. The Transport Study predicted that the capacity of the B1256 will be exceeded at 2033 without development proposed through the Local Plan. Development to the south of the A120 is most likely to increase the number of vehicles along the B1256, particularly around Takeley as traffic would drive along the B1256 past Hatfield Forest to access the A120 and M11. Taking this into account it is considered that Options 2b and 3 are less preferred as they propose additional growth at Takeley as well as a greater level of growth south of the A120.</p> <p>There are some other minor differences between the options in terms of wider biodiversity designations; however, these are not considered likely significantly differentiate them.</p> <p>Overall, Option 1 is preferred to 2a as it directs less growth within the emerging Zol for Hatfield Forest SSSI as well as less growth to the south of the A120, which is more likely to increase traffic along local roads, such as the B1256. Option 2a is preferred to Option 2b as it directs less growth to the south of the A120 and is therefore less likely to increase traffic along the B1256. Option 3 is the least preferred as it directs the greatest level of growth within the emerging Zol and south of the A120 during the plan period. Potential impacts post plan period are uncertain; however, the GCs provide an opportunity to deliver significant alternative areas for recreation as well as wider benefits such as a Mass Rapid Transit scheme which will help to reduce reliance on the private vehicle. Taking the above into account it is considered that Options 2b and 3 are more likely to result in a significant negative effect on biodiversity during the plan period.</p>
--	--

SA Objective 2: To conserve and enhance water quality and resources and help achieve the objectives of the Water Framework Directive				
	Option 1: Preferred Option	Option 2a: Less at GCs more at Towns/ Villages (with a train station)	Option 2b: Less at GCs more at other Villages	Option 3: No Garden Communities
Rank	=	=	=	=
Significant effect?	No	No	No	No
Discussion	<p>The WCS (2017 and updated 2018) found that while there are constraints, there is the potential to meet increased demands as a result of proposed development under Option 1 in terms of water resources and wastewater and sewerage infrastructure. It also found that the proposed development will not lead to a deterioration of WFD status or unduly compromise the achievement of WFD good status.</p> <p>While the EA have expressed concerns in relation to the Easton park GC and potential options for addressing wastewater and sewerage infrastructure, the WCS considered this issue and indicated that development can be accommodated albeit subject to a detailed WCS for the Thames Area of the district.</p> <p>There is the potential for localised issues in terms of water quality for each of these options; however, mitigation provided through national planning policy and available at the project level should ensure that there are no significant negative residual effects.</p> <p>None of the options are predicted to have a significant negative effect against this SA Objective and no significant differences have been identified.</p>			

SA Objective 3: To conserve and enhance the district's landscape character and townscapes				
	Option 1: Preferred Option	Option 2a: Less at GCs more at Towns/ Villages (with a train station)	Option 2b: Less at GCs more at other Villages	Option 3: No Garden Communities
Rank	=	=	=	=
Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative
Dsiccussion	<p>All of the options will result in localised impacts on landscape where development is focussed due to the introduction of development in previously undeveloped areas. The differences between the options mainly relate to the delivery of additional growth through the GCs or around existing towns and villages during the plan period.</p> <p>A Landscape Character Assessment (2006) was published some time ago; however, this identified character areas and not the sensitivity of the landscape in these areas or the capacity to accommodate growth. Landscape and visual appraisals of the proposed GCs were carried out in 2017. A separate appraisal of the GC options through the SA process found that the delivery of the GCs will result in a residual significant negative effect on the landscape and rural character in those areas where they are proposed.</p> <p>The additional growth proposed at Elsenham (under Options 2a and 3), Takeley and Little Dunmow (Options 2b and 3) are likely to have significant negative effects on the landscape surrounding and character of these villages. Option 3 proposes the greatest level of additional growth towards the towns and villages during the plan period and is therefore likely to have the greatest impact on the landscape and townscape in these areas.</p> <p>It is difficult to rank the options in terms of preference against this SA Objective as they are all predicted to have a residual significant negative effect as result of the introduction of development in previously undeveloped areas. Albeit in different areas of the district. The significance of the effect will ultimately be dependent on the design/ layout of development as well as the implementation of mitigation measures.</p> <p>It could be argued that the delivery of large-scale development, through the GCs, offers greater potential in terms of opportunities to mitigate negative effects as well as potential benefits through the creation of valued designed landscapes, such as the Country Park to be provided at Easton park GC. However, the success of the mitigation in this respect is uncertain at this stage.</p>			

SA Objective 4: To conserve and enhance soil and contribute to the sustainable use of land				
	Option 1: Preferred Option	Option 2a: Less at GCs more at Towns/ Villages (with a train station)	Option 2b: Less at GCs more at other Villages	Option 3: No Garden Communities
Rank	=	=	=	=
Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative
Discussion	<p>All of the options will result in the permanent loss of greenfield and agricultural land, including Best and Most Versatile agricultural land. The options including the delivery of the GCs will result in the loss of the greenfield/ agricultural land post plan period; however, this is not a significant differentiator between the options as under Option 3 development would need to be identified to replace that in the GCs post 2033.</p> <p>Option 1 helps to direct development away from the greenfield and agricultural land surrounding the towns and villages, while Options 2a, 2b and in particular 3 directs development away from the greenfield and agricultural land in the more rural areas of the district.</p> <p>All of the options propose a similar level of growth during the plan period and given the prevalence of Grade 2 BMV agricultural land throughout the district, it is difficult to identify any significant differences at this stage against this SA Objective.</p>			

SA Objective 5: To maintain and enhance the district's cultural heritage assets and their settings				
	Option 1: Preferred Option	Option 2a: Less at GCs more at Towns/ Villages (with a train station)	Option 2b: Less at GCs more at other Villages	Option 3: No Garden Communities
Rank	=	=	=	=
Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative
Discussion	<p>All of the options will result in localised impacts on the historic environment depending on where the additional growth is directed. The differences between the options mainly relate to the delivery of additional growth through the GCs or around existing towns and villages during the plan period.</p> <p>The delivery of the GCs is likely to have a residual significant negative effect on the rural character and historic environment of the areas where they are proposed. It should be noted that in the response to the Regulation 19 Pre-Submission Local Plan Historic England (HE) objected to the proposed North Uttlesford GC given the rich historic environment at Great Chesterford and the significance of the inter-relationship between designated heritage assets. HE also requested that heritage impacts be given more weight than other impacts. In response to the Regulation 18 Issues and Options Document (2015) Historic England commented that scenarios that focussed growth at existing settlements within the district would have implications for the historic towns and villages while noting more concern at Areas of Search for Great Chesterford, Easton Park, and South of the A120.</p> <p>Options 2a, 2b and in particular 3 have a greater likelihood for negative effects on the character of the historic towns and villages within the district compared to Option 1. This is likely to be a particular issue as a result of additional growth proposed at Great Dunmow, Little Dunmow and Elsenham (including potential impacts on the setting of Henham Village).</p> <p>Given HE's objection to the North Uttlesford GC, it could be argued that an additional spatial strategy option should be explored that only includes the delivery of the Easton Park and West of Braintree GCs and not the North Uttlesford GC. This would require additional growth at the existing towns and villages which are explored under Options 2a, 2b and 3. The additional growth could be directed to those settlements that are less constrained in terms of the historic environment, such as the edge of Bishop's Stortford, Takeley and Elsenham (although there are potential issues in relation to the setting of Henham Village). However, there are constraints outside the historic environment, explored under the other SA Objectives, that restrict the potential for additional growth in these areas and it is likely that there would need to be additional growth at some of the more sensitive historic settlements. Furthermore, additional growth at these settlements without any growth in North Uttlesford GC, has already been tested in option 3, and does not perform any better against this SA objective.</p> <p>It is difficult to rank the options in terms of preference against this SA Objective as they are all predicted to have a residual significant negative effect as they direct development to areas in that are sensitive in terms of the historic environment. Albeit in different areas of the district. The significance of the effect will ultimately be dependent on the design/ layout of development as well as the implementation of mitigation measures.</p> <p>It could be argued that the delivery of large-scale development, through the GCs, offers greater potential in terms of opportunities to mitigate negative effects on the historic environment as well as potential benefits through the creation of valued landscapes and improving accessibility and understanding of heritage assets. However, this is uncertain at this stage.</p>			

SA Objective 6: To reduce contributions to climatic change				
	Option 1: Preferred Option	Option 2a: Less at GCs more at Towns/ Villages (with a train station)	Option 2b: Less at GCs more at other Villages	Option 3: No Garden Communities
Rank	1	1	2	3
Significant effect?	Yes - Positive	Yes - Positive	No	No
Discussion	<p>Development proposed under any of the options has the potential to incorporate renewable or low carbon energy. However, generally larger-scale developments offer a greater opportunity to incorporate renewable or low carbon energy. For example, in larger schemes, large active solar systems can be combined with community heating schemes to support renewable energy and increased energy efficiency.</p> <p>Options 1, 2a and 2b direct the majority of additional growth necessary to meet identified needs at three new GCs. The large-scale development in these locations therefore presents an opportunity to incorporate renewable and low carbon energy. However, this is uncertain at this stage.</p> <p>More widely the GCs provide an opportunity to coordinate the provision of significant new physical and social infrastructure that will ensure that new residents have good access to services/ facilities and employment opportunities. It is assumed that the GCs will be relatively self-contained given the opportunities for the provision of new social infrastructure and accessibility in terms of sustainable transport modes. It is understood that the delivery of the Easton Park and West of Braintree GCs will provide a new Rapid Transit System (RTS), to improve sustainable transport connections between London Stansted, the GCs, Great Dunmow and Braintree. This will help to encourage a modal shift and reduce reliance on the private vehicle.</p> <p>Options 1 and 2a perform well against this objective as they take advantage of the opportunities presented through the GCs and direct any additional growth to the main towns and key villages with a train station, where there is access to services/ facilities or to sustainable transport modes. For Option 2a the key villages contain little employment and most travel from these villages will be by the car via local roads before accessing the strategic road network. Hence 2a is less preferable than Option 1.</p> <p>Option 2b directs some growth away from the GCs during the plan period and directs it to villages where there is land being promoted for development. This is not supported in terms of this SA Objective as the majority of additional growth is proposed at Takeley and Little Dunmow where there is a limited range of services/ facilities on offer and poor access to sustainable transport modes. The scale of growth at 750 dwellings at each of the villages is unlikely to delivery any new significant services/ facilities, although it is recognised that this could provide a new primary school at each village. However, pupils would still need to travel in order to access a secondary school. As a result, it is likely that new residents will need to travel by car to access a wider range of services/ facilities at Great Dunmow, Bishop's Stortford and/ or Braintree.</p> <p>Option 3 does not take advantage of the opportunities provided by the delivery of large-scale growth at the GCs. It directs additional growth to meet identified needs at the main towns and villages. This option performs the worst against this SA Objective compared to the others as it directs a greater proportion of growth to villages where there are limited services/ facilities on offer and poorer access to sustainable transport modes. It also proposes smaller scale development that is less likely to deliver any significant improvements to physical or social infrastructure.</p> <p>While it is recognised that there is some uncertainty around the scale of benefits to be deliver by new GCs in the district, there is also uncertainty in terms of what improvements might be delivered by a large number of smaller scale sites on the edge of existing settlements. This also needs to be viewed in the context of a rural district that contains small towns and villages with limited provision of services/ facilities. Options 1 and 2 are considered to have a significant long term positive effect as they are more likely to reduce the needs to travel. Options 2b and 3 are considered less likely to have a positive effect of significance as they direct more growth to the villages and this will not help to reduce the need to travel and will continue the current trend of private vehicle use.</p>			

SA Objective 7: Reduce and control pollution				
	Option 1: Preferred Option	Option 2a: Less at GCs more at Towns/ Villages (with a train station)	Option 2b: Less at GCs more at other Villages	Option 3: No Garden Communities
Rank	1	2	3	4
Significant effect?	No	No	No	Yes - Negative
Discussion	<p>Transport is a key issue in the District with above average long distance car commuting and impacts on strategic and local transport infrastructure. Consequently, this has an impact on air quality, particularly in areas where there is congestion. It should be noted that this SA Objective interacts with/ is linked to a number of other objectives, in particular those relating to access to services/facilities and sustainable transport modes.</p> <p>The Transport Study (2016 and updated in 2017 and 2018) concluded that even with no Local Plan development, congestion will increase on some roads within the district due to committed developments (both within the district and in the surrounding areas) and the attractiveness of distant employment locations by car. The study also indicates that modal shift will help by reducing car trips as a result of proposed development under Option 1. However, without appropriate mitigation, the capacity of the A120 within the district will still be exceeded even with the most optimistic (25%) modal shift assumption. The transport study identifies junctions in the district subject to stress that are sensitive to further impacts. Option 1 has least impact on these stressed junctions compared to 2a that has more development in Saffron Walden and in the key villages.</p> <p>Options 1, 2a and 2b direct the majority of additional growth necessary to meet identified needs at three new GCs. The large-scale of development in these locations presents an opportunity to coordinate the provision of significant new physical and social infrastructure that will ensure that residents have good access to services/ facilities and employment opportunities and help to reduce reliance on the private vehicle. While it is acknowledged that the GCs will have impacts on the surrounding and strategic road network it is also assumed that they will be relatively self-contained given the opportunities for the provision of new social infrastructure and accessibility in terms of sustainable transport modes. It is understood that the delivery of the Easton Park and West of Braintree GCs will provide a new Rapid Transit System (RTS), to improve sustainable transport connections between London Stansted, the GCs, Great Dunmow and Braintree. This will help to encourage a modal shift and reduce reliance on the private vehicle.</p> <p>Option 1 is preferred as it takes advantage of the opportunities presented by the GCs and minimises additional growth in towns and villages where there are identified constraints in terms of congestion and air quality. In particular the transport study identifies junctions in the district subject to stress that are sensitive to further impacts. Option 1 has least impact on these stressed junctions compared to 2a that has more development in Saffron Walden and in the key villages.</p> <p>Option 2a directs some growth away from the GCs during the plan period and instead focusses it at the towns and key villages with a train station. A study by ECC found that any further growth in the South East of Saffron Walden would have significant impacts on congestion in the town and the existing AQMA. Option 2a also proposes some additional growth at Stansted Mountfitchet, Elsenham and Great Chesterford, which has the potential for impacts on the capacity of Junctions 8 and 9 of the M11. As a result, Option 2a does not perform as well as Option 1.</p> <p>Option 2b directs some growth away from the GCs during the plan period and directs it to villages where there is land being promoted for development. Increased growth at Takeley and Little Dunmow is likely to increase traffic on the B1256, for which the Transport Study (2016 and updated in 2018) predicted that its capacity will be exceeded by 2033 even without development proposed through the Local Plan. Development to the south of the A120 is most likely to increase the number of vehicles along the B1256, particularly around Takeley as traffic would drive along the B1256 past Hatfield Forest (where there is an identified air quality issue) to access the A120 and Junction 8 of the M11.</p> <p>Option 3 does not take advantage of the opportunities provided by the delivery of large-scale growth at the GCs. It directs additional growth to meet identified needs at the main towns and villages. This option performs the worst against this SA Objective compared to the others as it is less likely to encourage a modal shift and reduce reliance on the private vehicle. There will need to be development at the smaller tier settlements and this will be small scale and unlikely to</p>			

	<p>provide any significant new social infrastructure. The majority of new residents will still need to travel by car to access a wider range of services/ facilities provided by the higher order settlements. As a result, this option is most likely to exacerbate congestion on the road network and reduce air quality in these areas.</p>
--	--

SA Objective 8: To reduce the risk of flooding				
	Option 1: Preferred Option	Option 2a: Less at GCs more at Towns/Villages (with a train station)	Option 2b: Less at GCs more at other Villages	Option 3: No Garden Communities
Rank	=	=	=	=
Significant effect?	No	No	No	No
Discussion	<p>The Uttlesford Strategic Flood Risk Assessment (SFRA) (2016) and the Environment Agency's Risk of Surface Water Flooding Maps (2018) show the flood risk across the district. The SFRA (2016) identifies that the region is prone to localised flooding, with the main source of flooding from fluvial and surface water sources. However, it is recognised that just over 96% of the district lies within Flood Zone 1 where there is a low probability of fluvial flooding.</p> <p>All of the options include sites that fall within some areas of high flood risk. However, none of the options are predicted to have a significant effect on this SA Objective once potential mitigation measures have been taken into account. No significant differences between these options against this SA Objective.</p>			

SA Objective 9: To promote and encourage the use of sustainable methods of travel				
	Option 1: Preferred Option	Option 2a: Less at GCs more at Towns/ Villages (with a train station)	Option 2b: Less at GCs more at other Villages	Option 3: No Garden Communities
Rank	1	1	2	3
Significant effect?	Yes - Positive	Yes - Positive	No	No
Discussion	<p>Transport is a key issue in the District with above average long distance car commuting and impacts on strategic and local transport infrastructure. The rural nature of the district means that the majority of residents need to travel by car to access services/ facilities in Saffron Walden and/ or Great Dunmow or the larger settlements outside the district such as Bishop's Stortford, Braintree, Cambridge and London. Commuting is mostly via the local highway network before accessing the strategic road network to larger employment centres.</p> <p>The Transport Study (2016 and updated in 2017 and 2018) concluded that even with no Local Plan development, congestion will increase on some roads within the district due to committed developments (both within the district and in the surrounding areas) and the attractiveness of distant employment locations by car. The study also indicates that modal shift will help by reduce car trips as a result of proposed development under Option 1. However, without appropriate mitigation, the capacity of the A120 within the district will still be exceeded even with the most optimistic (25%) modal shift assumption. Other options increase impact on the A120 and stressed junctions with less potential for modal shift. Option 1, 2a and 2b would have impacts on the A505 in Cambridgeshire because of North Uttlesford GC, while Options 2a, 2b and 3 would also impact on the A120 in East Herts and other routes heading into Bishops Stortford.</p> <p>As a result, it is important that any options for meeting identified needs during the plan period should seek to either focus development where there are existing services/ facilities that can be accessed using sustainable transport modes - or where there are opportunities to deliver new services/ facilities along with corresponding improvements to the accessibility of sustainable transport modes.</p> <p>Options 1, 2a and 2b all include the delivery of three new GCs. Given the scale of development at these sites, it is anticipated that they will be able to provide new services/ facilities to meet needs and that are also accessible to new residents by sustainable transport modes. It is understood that the delivery of the Easton Park and West of Braintree GCs will provide a new Rapid Transit System (RTS) scheme, to improve sustainable transport connections between London Stansted, the GCs, Great Dunmow and Braintree. While the full potential of the RTS may not be realised until after the plan period, it is assumed that it will be delivered in phases alongside housing, employment and other infrastructure. The delivery of the GCs and the RTS therefore has the potential for a significant long-term positive effect against this SA Objective.</p> <p>The additional growth outside of the GCs proposed under Options 1 and 2a is generally focussed on the main towns and key villages with a train. As a result, this is also considered positive as it will ensure that new residents have good access to existing services/ facilities as well as train stations. It should be noted that in relation to Elsenham, the withdrawn Local Plan (2014) Inspector's comments on existing rail line to sever connectivity between existing (western) and proposed (eastern) sides of the village and potential safety implications of retaining existing Station Road level crossing (particularly increased pedestrian movements). Options 1 and to a lesser extent 2a are likely to have a significant long term positive effect against this SA Objective. The key villages contain limited employment with most travel from to work from new development by car via local roads before accessing the strategic road network.</p> <p>Option 2b does not perform as well as Options 1 and 2a as it proposes that additional growth is directed to some of the wider villages where development is being promoted. There is no train station at these villages and limited access to services/ facilities. As a result, it is assumed that the majority of new residents would need to travel by car in order to access a wider range of services/ facilities on offer in some of the larger settlements.</p> <p>Option 3 does not include the delivery of the three GCs and therefore directs growth at the main towns and across the villages. As a result, it performs poorly against this objective as it will not deliver the improvements to services/ facilities or sustainable transport modes likely to arise through the other options. It is less likely to reduce reliance on the private vehicle and encourage the use of sustainable transport modes.</p>			

SA Objective 10: To ensure accessibility to services				
	Option 1: Preferred Option	Option 2a: Less at GCs more at Towns/ Villages (with a train station)	Option 2b: Less at GCs more at other Villages	Option 3: No Garden Communities
Rank	1	2	3	4
Signifiant effect?	Yes - Positive	Yes - Positive	No	No
Discussion	<p>The rural nature of the district means that the majority of residents need to travel by car to access services/ facilities in Saffron Walden and Great Dunmow within the district or the larger settlements outside the district including Bishop’s Stortford, Braintree and Cambridge.</p> <p>Options 1, 2a and 2b direct the majority of additional growth necessary to meet identified needs at three new GCs. The large-scale of development in these locations presents an opportunity to coordinate the provision of significant new physical and social infrastructure that will ensure that new residents have good access to services/ facilities and employment opportunities. The GCs are planned to be relatively self-contained and give opportunities for the provision of new social infrastructure and accessibility in terms of sustainable transport modes.</p> <p>Option 1 proposes that the GCs will deliver more housing during the plan period compared to the other options, which reduces the need for additional growth at the towns and villages within the district and therefore reduces pressure on the existing services/facilities at those settlements.</p> <p>Option 2a directs some growth away from the GCs during the plan period and instead focusses it at the towns and key villages with a train station. This is positive in terms of this SA Objective as it directs additional growth to the main towns where there is a greater range of services/ facilities; and to key villages that have a train station where there is limited services/ facilities available but the potential to access a wider range of facilities/services in larger settlements using sustainable transport modes. Given the scale of additional growth at the towns and key villages, it is unlikely that this option could deliver any new significant services/ facilities at the existing settlements. Furthermore, the key villages contain limited employment with most travel to work by car via local roads before accessing the strategic road network. Elsenham sites to the east of the village have potential issues of severance associated with Station Road level-crossing.</p> <p>Option 2b directs some growth away from the GCs during the plan period and directs it to villages where there is land being promoted for development. This is not supported in terms of this SA Objective as the majority of additional growth is proposed at Takeley and Little Dunmow where there is a limited range of services and facilities. The scale of growth at 750 dwellings at each of the villages is unlikely to delivery any new significant services/ facilities. As a result, it is likely that new residents will need to travel by car to access a wider range of services/ facilities at Great Dunmow, Bishop’s Stortford and/ or Braintree.</p> <p>Option 3 does not take advantage of the opportunities provided by the delivery of large-scale growth at the GCs. It directs additional growth to meet identified needs at the main towns and villages. This option performs the worst against this SA objective compared to the others as it directs a greater proportion of growth to villages where there are limited services/ facilities on offer. It also proposes smaller scale development that is less likely to deliver any significant new services/ facilities.</p> <p>Option 1 is preferred as it takes advantage of the opportunities presented by the GCs and minimises additional growth in towns and villages and therefore pressure on the existing services/ facilities. Potential for a significant long term positive effect.</p> <p>Option 2a also performs well and is likely to have a significant long term effect as it takes advantage of the opportunities presented through the GCs and directs any additional growth to the main towns and key villages with a train station. However, the key villages contain limited employment with most travel to work by car via local roads before accessing the strategic road network. While Option 2b takes advantage of the opportunities presented through the GCs it directs additional growth to villages without a train station. It will therefore increase pressure on the limited services/ facilities at these villages and the scale of growth is unlikely to deliver significant improvements (although it is recognised they could provide a new primary school). As</p>			

	<p>a result it is less likely to improve accessibility to services/ facilities and have a positive effect of significance compared to Options 1 and 2a.</p> <p>Option 3 performs the worst out of the options as it does not take advantage of the opportunities presented through the GCs and directs additional growth not only to the main towns but also to villages where there is limited services/ facilities on offer. The small scale of growth under this option is not likely to deliver any significant improvements to or new services/ facilities.</p>
--	--

SA Objective 11: To improve the population's health and promote social inclusion				
	Option 1: Preferred Option	Option 2a: Less at GCs more at Towns/ Villages (with a train station)	Option 2b: Less at GCs more at other Villages	Option 3: No Garden Communities
Rank	1	2	2	3
Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive	No
Discussion	<p>In terms of improving health and promoting social inclusion, key issues relate to the need to address any areas of rural deprivation, plan for the needs of an ageing population, protecting and enhancing important green assets, and ensure that new and existing communities have adequate access to community infrastructure, including health and recreation facilities.</p> <p>The delivery of large-scale growth at the GCs proposed under Options 1, 2a and 2b provide a significant opportunity to deliver improvements to social infrastructure compared to the smaller scale developments proposed under Option 3. The delivery of smaller scale growth at the towns and settlements is more likely to increase pressure on existing social infrastructure and not provide the same scale of improvements that are necessary to meet future needs. Furthermore, the GCs proposed under Options 1, 2a and 2b provide a greater opportunity to deliver larger and more accessible areas of multi-functional Green Infrastructure, which will have long term positive effects against this SA Objective. There is an identified need for a new Country Park within the district, which will help to relieve pressure on Hatfield Forest. The Easton Park GC will deliver a new Country Park within the district.</p> <p>While the IDP (2018) recognises that the GCs will have a significant impact on surrounding existing infrastructure, namely GP practices. It also states that each of the GCs will need to provide a new health centre. The IDP also identifies that a new hub facility will most likely be needed in Great Dunmow.</p> <p>Option 1 is preferred as it directs growth towards three new GCs, which have the potential to deliver significant new social infrastructure, including new multi-functional GI, such as a new Country Park. While Options 2a and 2b also direct growth towards three GCs they also increase pressure on existing social infrastructure at the towns and some key villages. Option 3 is the least preferred as it increases pressure on existing social infrastructure at the towns and villages and does not provide the same opportunity as the other options for significant improvements as a result of the delivery of large-scale growth through the GCs.</p>			

SA Objective 12: To provide appropriate housing and accommodation to meet existing and future needs				
	Option 1: Preferred Option	Option 2a: Less at GCs more at Towns/ Villages (with a train station)	Option 2b: Less at GCs more at other Villages	Option 3: No Garden Communities
Rank	2	1	1	1
Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive	Yes - Positive
Discussion	<p>There are no significant differences between the options in terms of the overall level of housing growth. Option 2b provides slightly less than the housing requirement of 14,700 dwellings; however, this could be easily addressed by delivering a small amount of additional growth at one of the towns or other key villages. All of them have the potential for a residual significant long term positive effect against this SA Objective.</p> <p>It could be argued that Options 2a, 2b and in particular 3 are more likely to deliver housing earlier in the plan period as research suggests that smaller scale development requires less lead-in time and carries less risk compared to larger scale development.¹²³ However, it should be noted that the Letwin Review (2018) suggests that build out rates would not necessarily be increased by reducing reliance on large-scale sites and that the large-scale sites are important for ensuring infrastructure provision.¹²⁴ Taking the above into account, it is considered that Options 2a, 2b and 3 are preferred in terms of this SA Objective as they are more likely to deliver housing earlier in the plan period and there is less risk overall in terms of meeting identified needs. While Option 1 is still considered to have a significant positive effect, it relies more on GCs and is therefore less likely to deliver housing earlier in the plan period and there are more risks associated with delivery overall.</p>			

¹²³ Nathaniel Litchfields & partners (2016) Start to Finish - How Quickly do Large-Scale Housing Sites Deliver? <https://lichfields.uk/media/1728/start-to-finish.pdf>

¹²⁴ Independent review of build out: draft analysis (2018) <https://www.gov.uk/government/publications/independent-review-of-build-out-draft-analysis>

SA Objective 13: To promote the efficient use of resources, including land and ensure the necessary infrastructure to support sustainable development				
	Option 1: Preferred Option	Option 2a: Less at GCs more at Towns/ Villages (with a train station)	Option 2b: Less at GCs more at other Villages	Option 3: No Garden Communities
Rank	1	1	1	2
Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive	Yes - Negative
Discussion	<p>There is limited brownfield land available for development given the rural nature of the district, so no significant differences between the options in this respect.</p> <p>The delivery of large-scale development through the three GCs proposed under Options 1, 2a and 2b are more likely to deliver the infrastructure required both during and beyond the plan period. Option 3 does not include the delivery of any GCs and while there are some larger-scale sites proposed they are not of an equivalent scale to the GCs and are therefore less likely to deliver significant new infrastructure during or beyond the plan period.</p>			

SA Objective 14: To improve the education and skills of the population				
	Option 1: Preferred Option	Option 2a: Less at GCs more at Towns/ Villages (with a train station)	Option 2b: Less at GCs more at other Villages	Option 3: No Garden Communities
Rank	1	2	2	3
Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive	Yes - Negative
Discussion	<p>Option 1 performs more strongly against this objective as it places less pressure on existing education infrastructure at the towns and key villages and includes the delivery of large-scale growth through the GCs, which provide the critical mass to deliver a new secondary school and more than one primary school. While Option 2a includes the delivery of the GCs it also increases pressure on existing education infrastructure at the main towns and key villages with a train station. Given constraints there are no sites proposed as part of the additional growth that will deliver a sufficient scale to provide a new secondary or primary school. The IDP states that the extension of existing secondary schools in Saffron Walden and Great Dunmow will be challenging as the school sites are constrained. Education provision within the proposed GCs could help provide for future needs.</p> <p>Option 2b includes the delivery of the GCs and proposes additional growth at the villages of Takeley and Little Dunmow. The scale of additional growth at these two settlements (750 dwellings) is enough provide a new primary school. This could have a positive effect for both of the settlements. The IDP (2018) notes that there is no scope to expand existing schools at Takeley. However, the IDP also notes that development at Takeley poses challenges for secondary school needs as pupils would need to travel away from the towns for schooling. This is also likely to be the case for Little Dunmow.</p> <p>Options 1, 2a and 2b have the potential for a significant long term positive effect as they will deliver the infrastructure necessary to meet needs. Option 1 is preferred as it places less pressure on existing education infrastructure. While Option 2b could deliver new primary schools at Takeley and Little Dunmow, pupils would need to travel away from the villages to access secondary schools.</p> <p>Option 3 combines the additional growth proposed at the towns and villages under Option 2a and 2b to replace the delivery of growth through the GCs during the plan period. This is not preferred in terms of this SA Objective as the scale of growth that can be accommodated at the existing towns and settlements given constraints will not deliver any new secondary schools and there are limited opportunities for the expansion of existing schools.</p>			

SA Objective 15: To ensure sustainable employment provision and economic growth				
	Option 1: Preferred Option	Option 2a: Less at GCs more at Towns/ Villages (with a train station)	Option 2b: Less at GCs more at other Villages	Option 3: No Garden Communities
Rank	1	1	1	2
Significant effect?	No	No	No	No
Discussion	<p>All of the options could deliver employment land as part of mixed use development. Options 2a, 2b and in particular 3 are more likely to support the vitality of existing town centres as additional growth is focussed at the towns and settlements. Options 2a and in particular 3 are more likely to support and maintain the long-term function of Saffron Walden and Great Dunmow Town Centres.</p> <p>The GCs proposed under Options 1, 2a and 2b will provide for a wide range of local jobs within easy commuting distance from homes, supporting self-containment. These options also include growth at the towns and villages which will help to support the vitality of existing centres. As a result, these options are preferred in terms of this SA Objective compared to Option 3.</p>			

Strategic employment land options

Within the main report, Chapter 8 explains how the options for the delivery of strategic employment land were identified. The options are as follows:

- Option 1: Strategic employment allocations at Chesterford Research Park and North Stansted
- Option 2; Strategic employment allocations at Chesterford Research Park and Gaunt's End
- Option 3: Strategic employment allocations at Chesterford Research Park, North Stansted and Gaunt's End

Appraisal findings for the strategic employment land options

A comparative appraisal of the options was carried out under each SA Objective. The findings are presented in the tables below.

SA Objective 1: To conserve and enhance biodiversity (habitats, species and ecosystems) within the district			
	Option 1: Delivering the residual need at Chesterford Research Park and North Stansted	Option 2: Delivering the residual need at Chesterford Research Park and Gaunt's End	Option 3: Delivering the residual need at Chesterford Research Park, North Stansted and Gaunt's End
Rank	1	1	2
Significant effect?	No	No	No
Discussion	<p><i>Chesterford Research Park</i></p> <p>Chesterford Research Park is located within a parkland setting, and as such, contains, and is surrounded by Important Woodland¹²⁵ and Ancient Woodland; the majority of which is identified as a BAP Priority Habitat (Deciduous Woodland). The development area proposed through all options largely avoids the identified habitats, with only partial overlap in the northern end of the site. It is recommended that development avoids the loss of trees and supporting ecological features in this area, to obviate the potential minor negative effects on biodiversity associated with habitat loss. In the long term, the growth of the research park is considered likely to lead to increased noise, light and air pollution with the potential for minor negative effects. In the wider setting; Nunn Wood and Hales and Shadwell Woods; both designated SSSIs, are located east of the site; and increased development is considered to have the potential for minor negative effects associated with increased noise, light and air pollution. The site lies within the identified SSSI Impact Risk Zones, where large infrastructure (such as warehousing/ industry) that may affect water supply (where floorspace is 1000m² or more) requires further consultation with Natural England.</p> <p><i>North Stansted</i></p> <p>The North Stansted site (in Options 1 and 3) contains areas of Important Woodland recognised as a BAP Priority Habitat (Deciduous Woodland) around the northern border of the site, and is located adjacent to a Local Wildlife Site (Stocking Wood) in the south of the site. It is recommended that development seeks to retain the existing woodland onsite to avoid the potential negative effects associated with habitat loss. However, it is still considered that in the long term development will lead to minor negative effects as a result of increased disturbance, noise, light and air pollution. Hatfield Forest SSSI lies in the wider surroundings - south of Stansted Airport; however, the type of development proposed (employment development) is not considered likely to lead to significant effects in terms of increased recreational disturbance. The development proposed could increase traffic on the M11 and congestion around Junction 8, which may contribute to decreased air quality in the vicinity of the SSSI with the potential for minor long term negative effects. Development should seek to improve accessibility at the site in terms of public transport and active travel opportunities - to include new bus routes to connect the site with London Stansted Airport and</p>		

¹²⁵ As identified within the Uttlesford District Policies Map.

	<p>its railway station - to contribute to mitigating the potential negative effects. In line with advice from Natural England, it is recommended that Local Plan policy provisions seek contributions towards the delivery of mitigation measures to address the likely impacts of decreased air quality at Hatfield Forest SSSI from all development falling within the emerging Zone of Influence (Zol). The emerging Zol is considered likely to include the site at North Stansted.</p> <p><i>Gaunt's End</i></p> <p>Whilst the site at Gaunt's End (in Options 2 and 3) does not contain any designated biodiversity or identified habitats, it lies in very close proximity to Eastend Wood SSSI. Development is considered to have the potential to have impacts on the SSSI through increased disturbance, noise, light and air pollution, particularly as a result of increased traffic on Hall Road; with the potential for minor long term negative effects. Development should seek to improve accessibility at the site in terms of public transport and active travel opportunities - to include extensions to existing bus routes to connect the site with London Stansted Airport and its railway station - to contribute to mitigating the potential negative effects.</p> <p><i>Conclusions</i></p> <p>Overall, both the North Stansted site and the site at Gaunt's End have the potential to affect nationally designated biodiversity, and as such, all of the options are considered likely to lead to minor negative effects. On balance, Option 3 is considered likely to lead to a negative effect of greater significance due to the larger scale of development and increased levels of traffic and congestion.</p> <p>It is also considered that biodiversity could potentially be enhanced under each of the options through strong Local Plan policies on biodiversity net gain.</p>
--	--

SA Objective 2: To conserve and enhance water quality and resources and help achieve the objectives of the Water Framework Directive			
	Option 1: Delivering the residual need at Chesterford Research Park and North Stansted	Option 2: Delivering the residual need at Chesterford Research Park and Gaunt's End	Option 3: Delivering the residual need at Chesterford Research Park, North Stansted and Gaunt's End
Rank	=	=	=
Significant effect?	No	No	No
Discussion	<p><u>Water Quality</u></p> <p>In terms of water quality; Chesterford Research Park is not affected by any main rivers, and the development area proposed through the options avoids any identified waterbodies. The site is located within a Groundwater Source Protection Zone; however the type of development proposed is not considered likely to lead to any significant effects on groundwater resources.</p> <p>The North Stansted site (in Options 1 and 3) is not affected by any main rivers, and the development proposed through the options avoids any identified waterbodies. The site is not located within a Groundwater Source Protection Zone. As such, the site is not considered likely to lead to any significant effects on this SA objective. Similarly, the Gaunt's End site (in Options 2 and 3) is not affected by any main rivers, and the development site avoids any identified waterbodies. It is also not located within a Groundwater Source Protection Zone. As such, the site is not considered likely to lead to any significant effects on this SA objective.</p> <p>As the variables in the options relate to the North Stansted and Gaunt's End sites - for which no likely significant effects are identified - the options are all considered to perform equally in terms of water quality.</p> <p><u>Water Resources</u></p> <p>The Water Cycle Study (2018)¹²⁶ identifies that Uttlesford District is partly underlain by a chalk aquifer of regional importance and the Environment Agency currently class the surface water and groundwater resources within the district as over-licensed or over-abstracted, meaning that there is no additional water available for supply. The District falls within Affinity Water's supply area. Water companies in England are legally required to supply water to private consumers and businesses within their area. As set out in the Water Industry Act 1991, they must prepare and maintain a Water Resources Management Plan (WRMP) that sets out how the company intends to maintain the balance between water supply and demand. Water companies are currently in the process of updating their WRMPs to take account of predicted growth and ensure that there are schemes in place to meet future demands.¹²⁷ As the scale of growth proposed under the options increases so does the pressure on water resources. However, given the legal requirements in place for WRMPs, it is considered that there are no significant differences between the options in terms of effects on water resources. In line with the Water Cycle Study recommendations, Local Plan policies should encourage the conservation of water in new dwellings and commercial properties to minimise negative effects on water resources. It is expected that development at any of the employment options can deliver mitigation (for example rain water harvesting measures) to support reduced water use per person per day.</p> <p>In terms of waste water, whilst the Water Cycle Study does not assess employment sites; an assumption is made that workers will mostly be included within population estimations from within the residential development trajectory that has been factored into the Study. Further to this, the Study identifies that there are limited constraints associated with the allocated development in the Towns and Key Villages; with the existing Water Recycling Centres having the capacity to accommodate increased flows, with future investment and planning by the operating sewerage company. Overall therefore, it is considered unlikely that any of the proposed options for the strategic allocation of employment land will lead to significant effects in terms of waste water treatment and they all perform similarly.</p>		

¹²⁶ Arcadis Design and Consultancy (2018) Water Cycle Study Detailed Update [online] available at: <https://www.uttlesford.gov.uk/article/4942/Infrastructure> [accessed 30/11/18]

¹²⁷ Affinity Water (2014) Water Resource Management Plan.

SA Objective 3: To conserve and enhance the district's landscape character and townscapes			
	Option 1: Delivering the residual need at Chesterford Research Park and North Stansted	Option 2: Delivering the residual need at Chesterford Research Park and Gaunt's End	Option 3: Delivering the residual need at Chesterford Research Park, North Stansted and Gaunt's End
Rank	1	2	3
Significant effect?	No	No	No
Discussion	<p><i>Chesterford Research Park</i></p> <p>Chesterford Research Park lies wholly within the Cam River Valley Landscape Character Area (LCA). Suggested Landscape Planning Guidelines for the LCA¹²⁸ include; conserving and enhancing the landscape setting of settlements; maintaining cross-valley views; and ensuring any development on valley sides is small-scale and that it responds to historic settlement pattern, form and building materials. Given that development is an expansion to the existing research park, the effects of development on the landscape are not considered likely to be significant; however, it is recognised that to a large degree this is dependent upon the delivery of high quality design and layout which will be guided by policy directions and managed at the development control level.</p> <p><i>North Stansted</i></p> <p>The site at North Stansted (in Options 1 and 3) is located just outside of the Countryside Protection Zone and outside of the identified LCA boundaries. Given that development will comprise part of the existing London Stansted Airport to include areas of previously developed land, the effects are not considered likely to be of significance at this stage; however, it is recommended that lower level landscape character assessments are completed to inform design and development layout.</p> <p><i>Gaunt's End</i></p> <p>The Gaunt's End site (in Options 2 and 3) is located in the Broxton Farmland Plateau LCA, and within the Countryside Protection Zone (an area of land designated in the Local Plan where development is restricted to avoid coalescence with London Stansted Airport, and to retain the open character of the zone). Landscape guidelines for the LCA¹²⁹ include; strengthening and enhancement of hedgerows; conserving and managing areas of ancient and semi-natural woodland; and conserving historic lanes. There are also a number of trees surrounding the site that are protected under Tree Preservation Orders. Whilst adjacent to existing employment buildings, large scale employment development at the site is considered likely to affect the rural setting to some degree; and the residual effects are ultimately dependent on aspects such as high quality design and effective layout. <i>Conclusions</i></p> <p>Overall, Option 1 is considered to perform better in terms of the landscape as it includes the regeneration of brownfield land within the commercial setting of the airport. Option 3 is considered to perform worse as it develops the greatest area of land.</p>		

¹²⁸ Chris Blandford Associates (2006) Landscape Character Assessment [online] available at: <https://www.uttlesford.gov.uk/article/4937/Environment> [accessed 30/11/18]

¹²⁹ Ibid.

SA Objective 4: To conserve and enhance soil and contribute to the sustainable use of land			
	Option 1: Delivering the residual need at Chesterford Research Park and North Stansted	Option 2: Delivering the residual need at Chesterford Research Park and Gaunt's End	Option 3: Delivering the residual need at Chesterford Research Park, North Stansted and Gaunt's End
Rank	1	2	2
Significant effect?	No	Yes - Negative	Yes - Negative
Discussion	<p>The land at Chesterford Research Park, whilst greenfield, is predominantly non-agricultural land; however, the eastern stretch of the site is identified as Grade 2 Best and Most Versatile (BMV) (highest quality) agricultural land. This area of Grade 2 BMV land is likely to be lost to development with the potential for permanent negative effects in terms of soil resources.</p> <p>The land at North Stansted (in Options 1 and 3) is partially non-agricultural land (and previously developed land), and partially Grade 2 BMV (highest quality) agricultural land. BMV agricultural land is considered likely to be lost as a result of development at the site with the potential for minor permanent negative effects in terms of soil resources.</p> <p>The land at Gaunt's End (in Options 2 and 3) is wholly Grade 2 BMV agricultural land, which is considered likely to be lost as a result of development with the potential for significant and permanent negative effects.</p> <p>Options 2 and 3 are considered less preferable to Option 1 against this SA objective as they would result in a greater loss of BMV agricultural land.</p>		

SA Objective 5: To maintain and enhance the district's cultural heritage assets and their settings			
	Option 1: Delivering the residual need at Chesterford Research Park and North Stansted	Option 2: Delivering the residual need at Chesterford Research Park and Gaunt's End	Option 3: Delivering the residual need at Chesterford Research Park, North Stansted and Gaunt's End
Rank	1	2	3
Significant effect?	No	Yes - Negative	Yes - Negative
Discussion	<p>Chesterford Research Park does not contain and is not immediately surrounded by any designated heritage assets. Whilst development has the potential to affect the wider rural setting; there are significant areas of woodland surrounding the site that are likely to provide screening. The development proposed at Chesterford Research Park, which is common to all of the options, is not considered likely to lead to any significant effects on the historic environment. However, it is recognised that an increase in traffic on local roads as a result of the development may affect the heritage settings of Little Walden, Little Chesterford and Great Chesterford (which contains a designated Conservation Area); with the potential for minor long term negative effects.</p> <p>The North Stansted site (in Options 1 and 3) is not known to contain any designated heritage assets; however, it is located adjacent to two Grade II Listed Buildings in the south west of the site, and a number of Grade II Listed Buildings located along Bury Lodge Lane, north east of the site. Therefore, development at the site is likely to affect the setting of designated heritage assets, with the potential for both positive and negative effects; which are ultimately dependent on aspects such as high quality design and layout. Given existing policy provisions, including protections provided through the NPPF, and the nature of the land as partially previously developed land; development is not considered likely to lead to any significant negative effects.</p> <p>The Gaunt's End site (in Options 2 and 3) contains a Grade II Listed Building (Brewer Cottage Sumach Cottage), and is located adjacent to more Grade II Listed Buildings at Mott's Hall, and along Hall Road. Whilst it is anticipated that the Listed Building on site will be retained (and it is recommended that policy provisions require this), the type of development proposed (employment land) is considered likely to significantly affect the setting of the Listed Building, which is a one storey timber framed cottage located in the centre of the site. Given the presence of the designated heritage asset on site, Options 2 and 3 are considered less preferable than Option 1, which does not contain any designated heritage assets. Option 3 is considered to perform worse as it will result in greater scale of development that will affect the historic environment over a larger area of the district.</p>		

SA Objective 6: To reduce contributions to climatic change			
	Option 1: Delivering the residual need at Chesterford Research Park and North Stansted	Option 2: Delivering the residual need at Chesterford Research Park and Gaunt's End	Option 3: Delivering the residual need at Chesterford Research Park, North Stansted and Gaunt's End
Rank	2	1	3
Significant effect?	No	No	No
Discussion	<p>It is considered that development through any of the options has the potential to incorporate energy efficiency measures that will support reduced energy consumption and greater energy efficiency. In this respect, policy provisions will be important to ensuring that development contributes to climate change mitigation. Whilst the Renewable Energy Study¹³⁰ explores the potential for renewable energy in housing development, it is similarly recognised that there is scope for employment development to employ similar or improved methods to support energy efficiency, which can include; solar water heating systems, active and passive solar space heating, solar photovoltaics (PV), wind energy and/ or ground-coupled energy. It is recommended that development includes such measures to support renewable energy generation, and it is considered that larger scale development has greater potential to incorporate such measures.</p> <p>Chesterford Research Park is located relatively close to Great Chesterford railway station; however, this is considered largely beyond any reasonable walking distance. There are existing bus connections to Little Chesterford which is in closer proximity to the site, and it is recommended that as the Research Park continues to grow and attract more people to the site, bus connections between the site and the railway station are improved to support more sustainable access and climate change mitigation in this respect.</p> <p>The North Stansted site is located beyond reasonable walking distance to a railway station and bus connections. Stansted Mountfitchet station is located beyond the M11 in the north west - however the motorway is likely to be a significant barrier to increasing accessibility to the west of the site. There is also a rail station at London Stansted Airport located north east of the site which is likely to be easier in terms of accessibility. Development will need to improve bus and cycle connections the rail station to support increased access to sustainable transport modes and to reduce reliance on the private vehicle.</p> <p>The Gaunt's End site is located in close proximity to the railway station at London Stansted Airport; however, this is still considered to be beyond reasonable walking distance. Existing bus routes service Elsenham (just north of the site) and Molehill Green (south east of the site); and it is considered that development at this scale could contribute to improved bus connections along Hall Road to service the site and improve connections to the railway station at Stansted Airport. This will promote the use of more sustainable methods of travel and reduce reliance on the private vehicle.</p> <p>All options are considered to have the potential to encourage the use of sustainable methods of travel; however, new bus connections at the North Stansted site are considered likely to be less viable than extensions to existing bus routes at Gaunt's End, and as such, Option 2 is preferred to Option 1. Option 3 is considered to perform worse due to the larger development area (to include the North Stansted site) and increased levels of traffic and congestion.</p>		

¹³⁰ Altechnica (2008) Renewable Energy Study of the District [online] available at: <https://www.uttlesford.gov.uk/article/4937/Environment> [accessed 22/11/18]

SA Objective 7: Reduce and control pollution			
	Option 1: Delivering the residual need at Chesterford Research Park and North Stansted	Option 2: Delivering the residual need at Chesterford Research Park and Gaunt's End	Option 3: Delivering the residual need at Chesterford Research Park, North Stansted and Gaunt's End
Rank	1	1	2
Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative
Discussion	<p>Further development at Chesterford Research Park is considered likely to increase traffic on the M11 and contribute to added congestion around Junction 9. Whilst there are no designated AQMAs around this area, the M11 is identified as a Poor Air Quality Zone. As such, all of the options are considered likely to contribute to decreased air quality in a sensitive location with the potential for significant long term negative effects. In line with sustainable access and climate change mitigation recommendations; the need to enhance bus and rail connections to the site are key to mitigating the potential for negative effects on air quality in this area.</p> <p>Both the North Stansted site and Gaunt's End sites are located in close proximity to the M11 which is recognised as a Poor Air Quality Zone. Development at either site is considered likely to impact upon traffic on the M11, and congestion at Junction 8, and as such, is likely to contribute to decreased air quality within a sensitive area; with the potential for significant long term negative effects. As identified for the Chesterford Research Park site; development will need to improve accessibility in terms of sustainable transport modes to provide mitigation for the potential negative effects.</p> <p>Overall there are no significant differences between Options 1 and 2; however, Option 3 is considered to perform worse due to the greater scale of development and therefore increased levels of traffic and congestion.</p>		

SA Objective 8: To reduce the risk of flooding			
	Option 1: Delivering the residual need at Chesterford Research Park and North Stansted	Option 2: Delivering the residual need at Chesterford Research Park and Gaunt's End	Option 3: Delivering the residual need at Chesterford Research Park, North Stansted and Gaunt's End
Rank	2	1	2
Significant effect?	No	No	No
Discussion	<p>Chesterford Research Park is not located within an area of identified fluvial or surface water flood risk, and is not located within an area susceptible to groundwater flood risk. As such, further development at the site is not considered likely to lead to any significant effects in terms of flood risk.</p> <p>The North Stansted site is not located within an area at risk of fluvial flooding; however, there is a significant band running centrally (east-west) through the site that is at risk of surface water flooding, and the site lies partially within an Area Susceptible to Groundwater Flooding (at less than 25%). In this respect, it is recommended that any development at the site provides sustainable drainage systems and mitigation to address flood risks on site, and seeks to ensure that development does not increase flood risk on or off-site.</p> <p>The Gaunt's End site is not located within an area at risk of fluvial flooding; however, there are small areas on site which are at risk of surface water flooding. The site is also located partially within an Area Susceptible to Groundwater Flooding (at less than 25%). In this respect, it is recommended that any development at the site provides sustainable drainage systems and mitigation to address flood risks on site, and seeks to ensure that development does not increase flood risk on or off-site.</p> <p>Overall, Option 2 is preferred as it does not include the North Stansted site which contains larger areas of flood risk.</p>		

SA Objective 9: To promote and encourage the use of sustainable methods of travel			
	Option 1: Delivering the residual need at Chesterford Research Park and North Stansted	Option 2: Delivering the residual need at Chesterford Research Park and Gaunt's End	Option 3: Delivering the residual need at Chesterford Research Park, North Stansted and Gaunt's End
Rank	2	1	2
Significant effect?	No	No	No
Discussion	<p>Chesterford Research Park is located relatively close to Great Chesterford railway station, however, it is considered largely beyond reasonable walking distance. There are existing bus connections to Little Chesterford which is in closer proximity to the site. It is recommended that as the Research Park continues to grow and attract more people to the site, bus and cycle connections between the site and the railway station are improved to support more sustainable access. The scale of development proposed at the site is considered likely to be able to support the delivery of such measures; which can contribute to improved access and more sustainable travel for both existing and future workers, with the potential for minor long term positive effects.</p> <p>The North Stansted site is located beyond reasonable walking distance to a railway station and bus connections. Stansted Mountfitchet station is located beyond the M11 in the north west - however the motorway is likely to be a significant barrier to increasing accessibility to the west of the site. There is also a rail station at London Stansted Airport located north east of the site which is likely to be easier to connect to. Development will need to improve bus and cycle connections the rail station to support increased access to sustainable transport modes and to reduce reliance on the private vehicle and deliver minor long term positive effects.</p> <p>The Gaunt's End site is located in close proximity to the railway station at London Stansted Airport; however, this is still considered to be beyond reasonable walking distance. Existing bus routes service Elsenham (just north of the site) and Molehill Green (south east of the site); and it is considered that development at this scale could contribute to improved bus connections along Hall Road to service the site and improve connections to the railway station at Stansted Airport. This will promote the use of more sustainable methods of travel and reduce reliance on the private vehicle with the potential for minor long term positive effects.</p> <p>All options are considered to have the potential to improve accessibility at the sites and encourage the use of sustainable methods of travel; however, Option 2 is preferred as extensions to public transport modes are considered likely to be more viable at the Gaunt's End site.</p>		

SA Objective 10: To ensure accessibility to services			
	Option 1: Delivering the residual need at Chesterford Research Park and North Stansted	Option 2: Delivering the residual need at Chesterford Research Park and Gaunt's End	Option 3: Delivering the residual need at Chesterford Research Park, North Stansted and Gaunt's End
Rank	=	=	=
Significant effect?	No	No	No
Discussion	<p>This SA objective is considered to be largely influenced by strategic housing development. As strategic employment development, it is considered likely that on-site service and facility provisions can meet people's working needs, and workers on site are likely to look to their home locations or the main settlement areas to meet the majority of their service and facility needs. As such, none of the options are considered likely to lead to significant effects on this SA objective.</p> <p>However, the delivery of new employment land through all of the options is also considered likely to support accessibility to jobs; and thus positively contribute to reducing social exclusion. All options are therefore considered to have the potential for minor long term positive effects.</p>		

SA Objective 11: To improve the population's health and promote social inclusion			
	Option 1: Delivering the residual need at Chesterford Research Park and North Stansted	Option 2: Delivering the residual need at Chesterford Research Park and Gaunt's End	Option 3: Delivering the residual need at Chesterford Research Park, North Stansted and Gaunt's End
Rank	=	=	=
Significant effect?	No	No	No
Discussion	<p>All options are proposing strategic scale employment development which will support access to jobs and promote social inclusion in this respect with the potential for minor long term positive effects.</p> <p>Chesterford Research Park is located within a parkland setting, and as such is considered to support the health and wellbeing of people on site by promoting access to natural and recreational spaces. In line with sustainable transport recommendations; any improvements to cycle routes between the site and Great Chesterford railway station could improve the opportunities for active travel to further support resident health and wellbeing.</p> <p>It is also recommended that development at either the North Stansted site (Options 1 and 3) or the Gaunt's End site (Options 2 and 3) seek to enhance cycle routes to promote active travel and the associated health benefits.</p> <p>There are no significant differences between the options against this SA objective.</p>		

SA Objective 12: To provide appropriate housing and accommodation to meet existing and future needs			
	Option 1: Delivering the residual need at Chesterford Research Park and North Stansted	Option 2: Delivering the residual need at Chesterford Research Park and Gaunt's End	Option 3: Delivering the residual need at Chesterford Research Park, North Stansted and Gaunt's End
Rank	=	=	=
Significant effect?	No	No	No
Discussion	The options do not propose the delivery of housing and as such are not considered likely to lead to any significant effects against this SA objective.		

SA Objective 13: To promote the efficient use of resources, including land and ensure the necessary infrastructure to support sustainable development			
	Option 1: Delivering the residual need at Chesterford Research Park and North Stansted	Option 2: Delivering the residual need at Chesterford Research Park and Gaunt's End	Option 3: Delivering the residual need at Chesterford Research Park, North Stansted and Gaunt's End
Rank	2	1	3
Significant effect?	No	No	No
Discussion	<p>In terms of the efficient use of natural resources; all of the options will result in development on greenfield land with the potential for negative effects in this respect - the significance of which increases as the scale of growth increases.</p> <p>Chesterford Research Park and the North Stansted site are not located within an area safeguarded for mineral resources. The Gaunt's End site is located partially within an area safeguarded for sand and gravel resources, and as such, development at the site is considered likely to contribute to the sterilisation of mineral resources with the potential for minor long term negative effects.</p> <p>In terms of infrastructure requirements; it is considered likely that development at Chesterford Research Park will increase traffic on the M11 and congestion around Junction 9 with the potential for long term negative effects. As such, it is recommended that sufficient development contributions are sought to address the constraints on the strategic highways network. As the Research Park continues to grow, it will be important to improve the bus and cycle connections between the site and Great Chesterford railway station to improve sustainable access to the site. This will also contribute to reducing pressure on the highways network by providing more viable alternatives to the private car.</p> <p>Similarly development at both the North Stansted site (Options 1 and 3) and the Gaunt's End site (Options 2 and 3) are considered likely to increase traffic on the M11 and congestion around Junction 8 with the potential for long term negative effects. As such, it is recommended that sufficient development contributions are sought to address the constraints on the strategic highways network. Development at these sites will also need to deliver improvements to bus and cycle connections to present viable alternatives to the private car.</p> <p>All options are considered to have the potential to improve accessibility at the sites and encourage the use of sustainable methods of travel; however, Option 2 is preferred as extensions to existing public transport modes are considered likely to be more viable at the Gaunt's End site (when compared to a need for new service routes at the North Stansted site). Option 3 is considered to perform worse due to the larger development area and increased levels of traffic and congestion increasing infrastructure development needs.</p>		

SA Objective 14: To improve the education and skills of the population			
	Option 1: Delivering the residual need at Chesterford Research Park and North Stansted	Option 2: Delivering the residual need at Chesterford Research Park and Gaunt's End	Option 3: Delivering the residual need at Chesterford Research Park, North Stansted and Gaunt's End
Rank	=	=	=
Significant effect?	No	No	No
Discussion	Further employment development at any of the site options is considered likely to contribute to a mixed and varied employment skills base to support and retain the local population; with the potential for long term positive effects for this SA objective. In particular the expansion of the R&D sector at Chesterford Research Park will contribute to attracting and retaining higher skill levels within the District with the potential for long term positive effects.		

SA Objective 15: To ensure sustainable employment provision and economic growth			
	Option 1: Delivering the residual need at Chesterford Research Park and North Stansted	Option 2: Delivering the residual need at Chesterford Research Park and Gaunt's End	Option 3: Delivering the residual need at Chesterford Research Park, North Stansted and Gaunt's End
Rank	=	=	=
Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive
Discussion	<p>All of the options seek to deliver new employment land to meet the future needs of the District. Each option provides enough employment land to meet the identified needs and provides a significant buffer and the flexibility to respond to changing needs. Each option is therefore considered likely to lead to long term significant positive effects against this SA Objective, and cannot be differentiated for their performance in this respect. Employment development and the expansion of Chesterford Research Park in particular is considered likely to support the delivery of a mixed and varied skills base with the potential for further long term positive effects.</p>		

This page is intentionally left blank

Sustainability Appraisal (SA) for the Uttlesford District Council Local Plan

SA Report

Non-Technical Summary

December 2018

Quality information

Prepared by	Checked by	Verified by	Approved by
Cheryl Beattie Environmental Planner	Alastair Peattie Associate Director	Steve Smith Technical Director	Steve Smith Technical Director
Alastair Peattie Associate Director			

Revision History

Revision	Revision date	Details	Name	Position
v1	12 December 2018	Draft for internal review	Cheryl Beattie	Environmental Planner
v2	13 December 2018	Draft for client review	Alastair Peattie	Associate Director
v3	13 December 2018	Final Draft for review	Alastair Peattie	Associate Director
v4	17 December 2018	Final for consultation	Alastair Peattie	Associate Director

Prepared for:

Uttlesford District Council

Prepared by:

AECOM Infrastructure & Environment UK Limited
3rd Floor, Portwall Place
Portwall Lane
Bristol BS1 6NA
United Kingdom

T: +44 117 901 7000
aecom.com

© 2018 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited (“AECOM”) for sole use of our client (the “Client”) in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. No third party may rely upon this document without the prior and express written agreement of AECOM.

Table of Contents

1.	Introduction	1
	Structure of the SA Report / this NTS	1
	What is the plan seeking to achieve?.....	1
	What is the Local Plan not seeking to achieve?	3
	What's the scope of the SA?.....	3
2.	Plan-making/ SA up to this point.....	11
	Introduction.....	11
	'Top-down' considerations.....	13
	'Bottom-up' considerations.....	14
	Establishing the Reasonable Alternatives	27
	Developing the preferred approach.....	36
3.	Appraisal findings at this stage.....	38
	Introduction.....	38
	Appraisal of the Local Plan	38
	Cumulative effects	44
4.	Next steps	47
	Introduction.....	47
	Plan finalisation	47
	Monitoring.....	47

1. Introduction

- 1.1 AECOM is commissioned to provide support for the Sustainability Appraisal (SA) of the emerging Uttlesford District Local Plan. SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of Local Plans is a legal requirement.¹
- 1.2 At the current time, The Council is preparing to submit the Local Plan to the Secretary of State for examination in public, in-line with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Submission SA Report and this Non-Technical Summary (NTS) are being published on the Council's website to allow representations to be submitted. The submission of the Local Plan will occur during this representation period, any comments received on the SA Report and the NTS will be submitted following the end of the consultation period.

Structure of the SA Report/ this NTS

- 1.3 Sustainability Appraisal reporting essentially involves answering the following questions in turn:
- 1) What has plan-making/SA involved up to this point?
 - Including consideration of 'reasonable alternatives'.
 - 2) What are the appraisal findings at this current stage?
 - i.e. in relation to the Submission Plan.
 - 3) What are the next steps?
- 1.4 Each of these questions is answered in turn below. Before answering Question 1, two initial questions are answered in order to further 'set the scene': i) What is the plan trying to achieve?; and ii) What is the scope of the SA?

What is the plan seeking to achieve?

- 1.5 Once adopted, the Uttlesford District Local Plan will set out the proposed strategy for meeting the district's needs in the period up to 2033, and will replace the currently adopted Uttlesford Local Plan (2005).

Plan vision and objectives

- 1.6 The vision for the district is as follows:
1. By 2033, Uttlesford will continue to be one of the most desirable places to live and work in the UK.
 2. Uttlesford will be a place where residents choose to live, where communities thrive, are healthy and safe, jobs and services are well connected, places have character and communities create and feel a 'pride of place'. A district of communities where the quality of life is high will be achieved by harnessing the benefits of new smart technology and promoting a healthy, safe and secure

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (2012). The Town and Country Planning (Local Planning) (England) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document.

environment, with well-designed new development, sufficient housing and jobs with a good range of facilities.

3. The diversity and quality of Uttlesford's countryside and natural environment will be safeguarded and the historic environment conserved and enhanced. There will be better access to the countryside and green spaces for local communities which will improve people's quality of life and health. The challenges presented by climate change will have been embraced, with new development being located and designed to minimise resource and energy use and reduce the risk of flooding.
4. New development will be focused on the towns and larger villages with three new garden communities being built within the district. West of Braintree – jointly planned with Braintree District Council; Easton Park and North Uttlesford Garden Communities. These new garden communities will be exemplars of 21st Century living providing well designed homes, high quality employment, services and facilities to meet the needs of residents and businesses. The new communities will be designed to support a high quality of life for all and create healthy, safe and vibrant places for living and working.
5. New housing will have responded to local needs with a range of different types, sizes and tenures of houses with a significant proportion being affordable. Housing will be of high quality, with excellent accessibility and well designed for whole life living, ensuring that the distinctive character of the district's towns and villages will be maintained and enhanced. This will have been supported by extensive community engagement and the production of Neighbourhood Plans.
6. The district will continue to thrive as a successful balanced local economy. The vitality and viability of the towns and villages will be maintained and enhanced and they will be safe, clean and attractive places. Facilities will allow new businesses to thrive, especially in the research and development sectors, and in the tourism sector. London Stansted Airport will form a pivotal part of the highly successful London Stansted Cambridge Corridor; the environmental impact of London Stansted Airport will be effectively managed.
7. Necessary infrastructure, community facilities and services will be in place to support growth. High-speed reliable broadband will be accessible for all homes and businesses.
8. There will be convenient, comfortable, safe and affordable environmentally sustainable alternatives to the use of the car, with improvements to strategic transport routes providing fast and reliable connections to London, London Stansted Airport, Cambridge and beyond.

1.7 The Plan objectives are identified under three different themes as follows:

- Theme 1 – Promote Thriving, Safe and Healthy Communities
 - Objective 1a: meeting the need for new homes
 - Objective 1b: protecting and supporting rural communities
 - Objective 1c: thriving safe communities
 - Objective 1d: infrastructure
 - Objective 1e: high quality design
- Theme 2 – Support Sustainable Business Growth
 - Objective 2a: enabling growth and investment
 - Objective 2b: supporting the Market Towns

- Objective 2c: London Stansted Airport
- Theme 3 – Protect and Enhance Heritage and Character
 - Objective 3a: safeguarding Uttlesford’s distinctive character and environment
 - Objective 3b: climate change and use of resources

What is the Local Plan not seeking to achieve?

- 1.8 It is important to emphasise that the plan will be strategic in nature. Even the allocation of sites/ establishment of site-specific policy through this plan should also be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues (in the knowledge that they can be addressed at the planning application stage). The strategic nature of the Local Plan is reflected in the scope of the SA.

What’s the scope of the SA?

- 1.9 The scope of the SA is essentially reflected in a list of sustainability objectives, developed subsequent to a ‘scoping’ process (which included consultation on the scope of the SA in July and September 2015). Taken together, these objectives indicate the parameters of SA, and provide a methodological ‘framework’ for appraisal.

Table 1.1: SA Framework (as broadly agreed in 2015)

SA Objective	Sustainability issue(s)	Key questions – strategy and policy	Potential indicators
1) To conserve and enhance biodiversity (habitats, species and ecosystems) within the District	<ul style="list-style-type: none"> ▪ Conservation and protection of nationally and locally important designated sites ▪ Condition of some of the SSSIs ▪ Sensitivity of water environment to physical change 	<ul style="list-style-type: none"> ▪ Will it conserve and enhance natural/semi natural habitats? ▪ Will it conserve and enhance species diversity, and in particular avoid harm to indigenous BAP priority species? ▪ Will it maintain and enhance sites designated for their nature conservation interest? ▪ Will it maintain and enhance the connectivity of habitats and their ability to deliver ecosystem services e.g. flood risk management, climate change mitigation & adaptation and access for health? ▪ Will there be any impacts on the water environment as a result of hydromorphological changes and vice versa? 	<ul style="list-style-type: none"> ▪ Spatial extent of designated sites within the District ▪ Achievement of Biodiversity Action Plan targets ▪ Ecological potential assessments Distance from site to nearest: <ul style="list-style-type: none"> ○ SSSIs ○ NNR ○ LoWS ○ Ancient Woodland ○ Protected lanes ▪ Other sensitive designated or non- designated receptors ▪ Condition of the nearest sensitive receptors (where viable) ▪ Site visit surveys on typical abundance and frequency of habitats (DAFOR scale)
To conserve and enhance water quality and resources and help to achieve the objectives of the Water Framework Directive	<ul style="list-style-type: none"> ▪ Water quality ▪ Pollution of water course 	<ul style="list-style-type: none"> ▪ Will it help to ensure that good status of surface water is achieved and that deterioration in the status of waters is prevented? ▪ Will it help to ensure that good status of groundwater is achieved and that deterioration in the status of waters is prevented? 	<ul style="list-style-type: none"> ▪ Water quality (and trends) in river basin district (river quality data). Compliance with emission limits in identified locations. ▪ Compliance with environmental quality standards in identified locations.
3) To conserve and enhance the District's landscape character and townscapes	<ul style="list-style-type: none"> ▪ The local landscape varies in its sensitivity to change 	<ul style="list-style-type: none"> ▪ Will landscape character areas be protected? ▪ Will it enhance and/or conserve the countryside? Will the District's best agricultural land be protected? ▪ Will it seek to direct development outside the Green Belt? 	<ul style="list-style-type: none"> ▪ Developments permitted contrary to Landscape Character Assessment 'sensitivities to change'. ▪ Number and extent of field boundaries affected. ▪ Percentage of applications permitted on the District's best agricultural land (from ALC)
4) To conserve and enhance soil and contribute to the sustainable use of land	<ul style="list-style-type: none"> ▪ Protecting the best and most versatile soil 	<ul style="list-style-type: none"> ▪ Will it seek to protect the District's best and most versatile soil (Grade 2)? ▪ Will it seek to direct development away from Grade 2 soil, where feasible and in consideration of the impacts and benefits of development? 	<ul style="list-style-type: none"> ▪ Proportional loss of Grade 2 agricultural land. ▪ Proportion of development directed to Grade 3 agricultural land. ▪ Proportion of development on brownfield land.
5) To maintain and enhance the District's cultural heritage assets and their settings	<ul style="list-style-type: none"> ▪ A strong historic integrity with historic settlements and many historic buildings and 	<ul style="list-style-type: none"> ▪ Will it protect and enhance sites, features and areas of historical, archaeological and cultural value in both urban and rural areas? ▪ Will areas of historic character be protected from 	<ul style="list-style-type: none"> ▪ Proximity to nearest (including its setting): <ul style="list-style-type: none"> - Scheduled Monument? - Listed Building? - Conservation Area?

SA Objective	Sustainability issue(s)	Key questions – strategy and policy	Potential indicators
	monuments	development? <ul style="list-style-type: none"> ▪ Will the character and setting of historic settlements be protected as identified in the Uttlesford District Historic Environment Characterisation Project (ECC, 2009)? ▪ Does it seek to enhance the range and quality of the public realm and open spaces? ▪ Will it reduce the amount of derelict, degraded and underused land? ▪ Does it encourage the use of high quality design principles to respect local character? ▪ Will any adverse impacts be reduced through adequate mitigation? 	<ul style="list-style-type: none"> - Registered Historic Park or Garden? - Site identified in the Historic Environment Record? - Building of local interest? - Other historic feature? ▪ Number and spatial extent of listed buildings ▪ Number and spatial extent of scheduled monuments ▪ Buildings At Risk Register Heritage at risk surveys ▪ Percentage of conservation area demolished or otherwise lost. Amount of derelict properties and/or vacant land ▪ Number of heritage assets being positively removed from the heritage at risk register. ▪ Amount of damage to listed buildings or scheduled monuments ▪ Management of designated and undesignated historic environment assets ▪ Numbers of undesignated historic environment assets lost through the planning process
To reduce contributions to climatic change	<ul style="list-style-type: none"> ▪ Future climate change projections ▪ Energy consumption ▪ High private vehicle usage 	<ul style="list-style-type: none"> ▪ Will it reduce emissions of greenhouse gases by reducing energy consumption? ▪ Will it lead to an increased proportion of energy needs being met from renewable sources? ▪ Does it ensure more sustainable modes of travel are provided? ▪ Will it encourage greater energy efficiency? ▪ Will it improve the efficient use of natural resources? 	<ul style="list-style-type: none"> ▪ Carbon Dioxide emissions Energy consumption GWh/households ▪ Spatial extent of flood zones. ▪ Air Quality Management Areas and PM10 emissions ▪ Percentage of energy supplied from renewable sources.
7) Reduce and control pollution	<ul style="list-style-type: none"> ▪ Number of AQMAs and other areas exceeding NO₂ threshold ▪ Ambient noise levels around Stansted airport and major roads ▪ Water quality targets in order to reduce and control pollution across 	<ul style="list-style-type: none"> ▪ Will it improve, or not detrimentally affect air quality? ▪ Will emissions be limited to levels that will not damage natural systems and affect human health? ▪ Does it ensure that National Air Quality Standards are met at relevant points? ▪ Does it seek to improve or avoid increasing traffic flows generally and in particular through AQMAs? ▪ Does it seek to protect rural areas from increased traffic? ▪ Will it lead to no deterioration on the quality of water 	<ul style="list-style-type: none"> ▪ Number and spatial extent of AQMA's in the District ▪ NO₂ emissions ▪ Recorded traffic flows ▪ Location and extent of AQMAs in relation to infrastructure requirements ▪ Location and extent of potentially significant junctions in relation to infrastructure requirements ▪ Percentage of water bodies at

SA Objective	Sustainability issue(s)	Key questions – strategy and policy	Potential indicators
	all waterbodies (including surface and groundwaters), and from all land uses proposed, including wastewater and as a result of increased energy use	<p>bodies?</p> <ul style="list-style-type: none"> ▪ Does it promote the inclusion of Sustainable Drainage Systems in new developments? ▪ Does it seek to reduce, or not detrimentally affect noise levels? ▪ Does it seek to protect soil quality, including the remediation of contaminated sites? 	<p>good ecological status or potential</p> <ul style="list-style-type: none"> ▪ Percentage of water bodies assessed at good or high biological status ▪ Percentage of water bodies assessed at good chemical status ▪ Number of Sustainable Drainage Systems applications and number granted ▪ Ambient noise levels ▪ Development on PDL
8) To reduce the risk of flooding	<ul style="list-style-type: none"> ▪ Fluvial flood risk ▪ Pluvial flood risk ▪ Flood risk from other sources 	<ul style="list-style-type: none"> ▪ Does it seek to avoid development in areas at risk of flooding? ▪ Does it seek to avoid increasing flood risk in areas away from initial development? ▪ Does it take account of climate change in relation to flooding? ▪ Does it seek to manage and mitigate the risk of flooding? ▪ Is/will the sequential test being used to reach decisions on development proposals? ▪ Will developer contributions be utilised for the provision and maintenance of flood defences? ▪ Does it require sustainable drainage systems to be included within new development? 	<ul style="list-style-type: none"> ▪ Location of main rivers in District. ▪ Spatial extent of flood zones 2 and 3 ▪ Residential properties flooded from main rivers ▪ Planning permission in identified flood zones granted permission contrary to advice from the Environment Agency ▪ Incidences of flooding and location ▪ Distance of site to floodplains ▪ SFRA results ▪ Incidences of flood warnings in site area ▪ Distance to areas that are susceptible to surface water flooding – updated Flood Map for Surface Water Flooding (EA) ▪ On site and nearby topography via ordnance survey mapping ▪ Number of applications where there was a failure to pass the sequential test, even though sites at lower risk of flooding were available, but other planning reasons were given for granting planning permission.
9) To promote and encourage the use of sustainable methods of travel	<ul style="list-style-type: none"> ▪ High private vehicle usage ▪ Public transport, walking and cycling coverage across the District 	<ul style="list-style-type: none"> ▪ Will it increase and/or improve the availability and usability of sustainable transport modes? ▪ Will it seek to encourage people to use alternative modes of transportation other than private vehicle? ▪ Will it contribute positively to reducing social exclusion by ensuring access to jobs, shopping, leisure facilities and services? ▪ Will it reduce the need to travel? 	<ul style="list-style-type: none"> ▪ Access to services and business' by public transport ▪ Indices of Multiple Deprivation ▪ Travel to work methods and flows ▪ Car ownership ▪ Network performance on roads ▪ Public transport punctuality and efficiency

SA Objective	Sustainability issue(s)	Key questions – strategy and policy	Potential indicators
		<ul style="list-style-type: none"> ▪ Will it lead to the integration of transport modes? ▪ Will it improve rural public transport? ▪ Will it promote the integration of sustainable school travel and transport? 	
10) To ensure accessibility to services	<ul style="list-style-type: none"> ▪ Access to services such as education, healthcare and jobs, and other amenities ▪ Access to natural greenspace ▪ Self-sustainability 	<ul style="list-style-type: none"> ▪ Will it contribute positively to reduce social exclusion by ensuring access to jobs, shopping, services and leisure facilities for all? ▪ Will it improve access to jobs, shopping, services and leisure facilities? ▪ Will it reduce the need to travel? ▪ Will it increase traffic in rural areas? ▪ Does it protect or increase village facilities? ▪ Will it lead to the integration of transport modes? ▪ Does it seek to concentrate development and facilities in town centres or where access via sustainable travel is greatest? ▪ Will it assist in reducing the number of road casualties and ensure ease of pedestrian movement especially for the disabled? 	<ul style="list-style-type: none"> ▪ Residents opinion on availability of open space/leisure facilities ▪ Access to services by public transport ▪ Indices of Multiple Deprivation – sub-domain scores ▪ Natural England Accessible ▪ Natural Greenspace Standards ▪ Recorded traffic flows ▪ KSI casualties for adults and children ▪ Car ownership ▪ Location of site with regards to areas of high deprivation
11) To improve the population's health and promote social inclusion	<ul style="list-style-type: none"> ▪ Access and provision of healthcare ▪ Needs of an ageing population ▪ Access to natural greenspace ▪ Access to Sport and recreation ▪ Access to facilities generally on foot or by bicycle ▪ Obesity and other health issues 	<ul style="list-style-type: none"> ▪ Will it reduce health inequalities? ▪ Will it improve access to high quality health facilities? ▪ Will it improve air quality? ▪ Will it improve water quality? ▪ Will it increase access to sport and recreation facilities and open space? ▪ Will improve services for young people? ▪ Will it contribute positively to reducing social exclusion for all members of society? ▪ Will it ensure access to jobs, shopping, leisure facilities and services is available for all? ▪ Will there be measures to increase the safety and security of new development and public realm? ▪ Does it seek to reduce inequalities between areas and support cultural identity? ▪ Will it encourage access by walking or cycling, and will it increase the overall rates of walking and cycling? 	<ul style="list-style-type: none"> ▪ Life Expectancy ▪ Indices of Multiple Deprivation – sub-domain scores ▪ Residents opinion on availability of open space/leisure facilities ▪ Air Quality Management Areas (number and performance) and PM10 emissions ▪ KSI casualties for adults and children ▪ Natural England Accessible ▪ Natural Greenspace Standards (ANGSt) ▪ Recorded key offences ▪ Location and extent of recreational facilities to development site ▪ Location and extent of accessible greenspace to development site ▪ Proximity of site to healthcare facilities

SA Objective	Sustainability issue(s)	Key questions – strategy and policy	Potential indicators
		<ul style="list-style-type: none"> Does it respond to ageing demographics in all relevant areas of influence throughout the plan period? 	<ul style="list-style-type: none"> Percentage of population obese
12) To provide appropriate housing and accommodation to meet existing and future needs	<ul style="list-style-type: none"> Housing affordability Future population and household projections Future housing growth and need Affordable and social housing 	<ul style="list-style-type: none"> Will it provide housing which meets local needs? Will it increase the range and affordability of housing for all social groups to the designated target? Will it reduce the number of unfit homes? Does it allow for homes to be adapted for lifetime use, or make provisions for them to be included in new development? Does it seek to deliver self-build and custom build homes? Does it respond to the needs of an ageing population? Is there scope to deliver the independent living agenda in larger developments? Will homes be designed with a low carbon footprint? Are dwellings easily accessed by transport links, jobs, services, commercial areas and leisure facilities? Will homes be designed to enhance the existing street scene creating a better cultural heritage & public realm? Will homes be sufficiently phased during the plan period and beyond in light of the East of England Plan or subsequent targets? Will homes be supported by adequate greenspace? Does it support affordable housing in rural areas? Will rural housing be supported by local services? Does it make provision for gypsy and traveller accommodation? 	<ul style="list-style-type: none"> House Prices LA dwelling stock below the 'Decent Home Standard' Indices of Multiple Deprivation Score – particularly Housing and Services Domain and the Living Environment Deprivation Domain Number of affordable dwelling completions Annual dwelling completions Size and age of housing stock Access to sustainable transport links Population projections and forecasts Crime rates
13) To promote the efficient use of resources and ensure the necessary infrastructure to support sustainable development	<ul style="list-style-type: none"> Water resources Open space Housing growth to be supported by jobs, infrastructure and services 	<ul style="list-style-type: none"> Does it seek to ensure the provision of sufficient infrastructure in line with projected increases in population? Does it ensure that adequate school expansion, new healthcare and community facilities are provided where the size of housing development requires it? Will water resources be able to accommodate growth? 	<ul style="list-style-type: none"> Water cycle study S106 agreement contributions Transport Assessments Additional capacity of local schools Number of GPs and dentists accepting new patients ANGSt

SA Objective	Sustainability issue(s)	Key questions – strategy and policy	Potential indicators
	<ul style="list-style-type: none"> Foul water disposal/ sewerage infrastructure Reducing waste arising and dealing with waste in a more sustainable manner 	<ul style="list-style-type: none"> Does it ensure the reinforcement of wastewater treatment works or the provision of alternatives (where required) to support growth? Will financial contributions be adequate to provide the necessary infrastructure? Does it seek to promote the minimisation of waste at its source, and integrate solutions into the design of new development? Does it ensure that infrastructure/highway improvements will be made (where required) to support growth? Will it ensure that infrastructure is provided prior to use or through phasing of development? Will it improve the efficient use of natural resources? 	<ul style="list-style-type: none"> Amount of waste recycled/landfilled.
14) To improve the education and skills of the population	<ul style="list-style-type: none"> Provision of education Areas deprived of training, education and skills 	<ul style="list-style-type: none"> Does it seek to improve existing educational facilities and/or create more educational facilities? Does it seek to improve existing training and learning facilities and/or create more facilities? Will the employment opportunities available be mixed to suit a varied employment skills base? Will new housing be supported by school expansion or other educational facilities where necessary? 	<ul style="list-style-type: none"> GCSE or equivalent performance Level 2 qualifications by working age residents Level 4 qualifications and above by working age residents Employment status of residents Average gross weekly earnings Standard Occupational Classification
15) To ensure sustainable employment provision and economic growth	<ul style="list-style-type: none"> Local employment and wage differences Level of unemployment High proportion of rural based businesses 	<ul style="list-style-type: none"> Will it increase vitality of existing towns and local centres? Does it promote and enhance the viability of existing centres by focusing development in such centres? Will retailing in town centres be enhanced in areas of identified need? Will it encourage employment and reduce unemployment overall? Does it secure more opportunities for residents, of all abilities, and in all employment sectors, to work in the district? Will new housing be supported by adequate local employment opportunities? Will it improve business development and attract investment? 	<ul style="list-style-type: none"> Employment land availability Typical amount of job creation (jobs per ha) within different use classes. Percentage change and comparison in the total number of VAT registered businesses in the area Businesses by industry type Amount of vacant industrial floorspace Amount of high quality agricultural land Travel to work flows Employment status by residents and job type Job densities Economic activity of residents Average gross weekly pay

SA Objective	Sustainability issue(s)	Key questions – strategy and policy	Potential indicators
		<ul style="list-style-type: none"> ▪ Does it support small businesses to grow and encourage business innovation? ▪ Will it make land and property available for business development? ▪ Will it enhance the Districts potential for tourism? ▪ Will it encourage rural economy and diversification of it? ▪ Does it enhance consumer choice through the provision of range of shopping, leisure and local services to meet the needs of the entire community? ▪ Does it prevent further loss of retail and other services to rural areas? ▪ Will it lead to development having an adverse impact on employment for existing facilities? ▪ Will emerging policy ensure there is adequate future provision of Early Years and Childcare? 	<ul style="list-style-type: none"> ▪ Proportion of business in rural locations ▪ Amount of retail, leisure and office floorspace in town centres. ▪ Implemented and outstanding planning permissions for retail, office and commercial use ▪ Number and type of services ▪ Pedestrian footfall count ▪ Number of post offices closed down ▪ Number of village shops closed down

2. Plan-making/ SA up to this point

Introduction

- 2.1 Local plan-making has been underway since 2015, with a wide range of evidence produced to inform the development of the Local Plan. **Table 2.1** sets out the key Local Plan and SA Documents published along with dates for consultation. The Local Plan documents and the evidence base (including the SA Reports) can be viewed and downloaded on the Council's website.²

Table 2.1: Local Plan and SA stages

Local Plan Documents & Consultation	SA Documents & Consultation
	SA Scoping Report Sent to statutory consultees and published for wider consultation from July to September 2015
Issues and Options Consultation Document (Reg 18) Public consultation from October to December 2015	Areas of Search and Strategic Scenarios SA Report Public consultation from October to December 2015
Draft Local Plan Consultation (Reg 18) Public consultation from July to September 2017	SA Report Public consultation from July to September 2017
Pre-Submission Local Plan Consultation (Reg 19) Public representation period from June to August 2018	SA Report Public representation period from June to August 2018
Addendum of Focussed Changes to the Reg 19 Plan Public representation period from October to November 2018	SA Report Public representation period from October to November 2018
Submission of the Pre-Submission Local Plan and Addendum of Focused Changes in January 2019	Submission SA Report (this report) Public representation period from January to February 2019.

- 2.2 It is clear from the table above that a significant amount of work has been carried out to date to through the plan-making/ SA process. In-line with regulatory requirements, there is a need to explain how work was undertaken to develop and then appraise reasonable alternatives, and how the Council then took into account appraisal findings when finalising the Local Plan. This part of the NTS presents a summary of this information and is important given regulatory requirements.³
- 2.3 The focus here, within Part 1 of the NTS, is not to relay the entire 'story' of plan-making to date, but rather the work undertaken to develop and then appraise reasonable alternatives in late 2018, prior to finalising the Local Plan for submission. The findings of the previous SA work for the various Local Plan stages are summarised in the main SA Report in Chapters 5 to 7.

² <https://www.uttlesford.gov.uk/article/4916/Documents-which-make-up-the-Local-Plan>

³ There is a requirement for the SA Report to present an appraisal of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with'. Whilst this report is not the SA Report, it is appropriate to present this information nonetheless for the benefit of stakeholders.

Context

- 2.4 At this stage the Council is preparing to submit the Regulation 19 Local Plan and Addendum of Focused Changes to the Secretary of State for examination in public in January 2019.
- 2.5 Representations received through consultation on the Regulation 19 Local Plan and Addendum of Focused Changes raised a number of concerns in relation to the SA process for the Local Plan. This included concerns around the consideration of Garden Community options through the SA process as well as the narrative and justification for the preferred spatial strategy.
- 2.6 A further concern identified by the Council was that the Inspector's Post-Hearing Letter (June 2018) published during the examination for the North Essex Authorities (NEA) Local Plans (Strategic Section 1), identified a number of shortcomings in that plan's SA process. These were:
1. Objectivity of the assessment of the chosen spatial strategy and the alternatives to it;
 2. The clarity of the descriptions of those spatial strategy alternatives and the reasons for selecting them; and
 3. The selection of Garden Communities (GC) and GCs for assessment.
- 2.7 Given the concerns identified above, the Council decided that it would be prudent to undertake further work at this stage to try and address some of the issues raised and ensure a robust SA process for the Local Plan.
- 2.8 In response to the concerns identified above further SA work was carried out to:
- Clearly set out the realistic locations, delivery rates and therefore reasonable alternatives for Garden Communities. Provide a fresh objective and comparative appraisal of these alternatives through the SA process.
 - Clearly explain how the evidence is brought together in order to establish reasonable district-wide spatial strategy alternatives. Provide a clear description of the options as well as an objective and comparative appraisal of them through the SA process.
 - Clearly present the Council's outline reasons for selecting the preferred approach and rejecting alternatives at this stage.

Structure of this Chapter

- 2.9 This Chapter is structured as follows:
- **'Top-down' considerations** - briefly sets out the key high-level issues around the quantum of growth.
 - **'Bottom-up' considerations** - sets out the key information on site options both for Garden Communities and other sites to meet the identified quantum.
 - **Establishing the reasonable alternatives** - brings the evidence together and sets out spatial strategy alternatives as well as some employment land options.
 - **Appraising the reasonable alternatives** - presents the summary findings of the appraisal.
 - **Developing the preferred approach** - presents the Council's outline reasons for selecting the preferred approach and rejecting alternatives.

‘Top-down’ considerations

Housing quantum

- 2.10 The identified housing need for the plan period is ‘at least 14,000 homes’. This is based on the updated SHMA (2017) that took account of the 2014-based household projections and the outcomes from the recent examinations of other Local Plans within the HMA (adopted East Hertfordshire Local Plan).
- 2.11 A Memorandum of Understanding (MoU) was signed in March 2017 regarding the spatial distribution of housing across the HMA. Uttlesford is committed to meeting its housing need within its administrative boundaries; no other authority has requested that Uttlesford help to meet any unmet needs.
- 2.12 There are limited arguments to suggest that the Local Plan might provide for below OAHN. While the signed MoU (March 2017) proposes that Uttlesford will deliver around 12,500 new homes during the plan period, updated evidence in the SHMA suggests that the level of need is higher. Options that involve delivering below OAHN can be ruled-out as unreasonable on the basis that Uttlesford is committed through the MoU to meeting its housing need within its administrative boundaries. There is also no potential to export unmet needs to neighbouring authorities during the plan period, which are equally as constrained as Uttlesford.
- 2.13 Options that involve delivering above the OAHN have been explored and appraised at past plan-making/ SA stages. It is not considered necessary to explore options for delivering a higher OAHN at this stage on the basis that no other authorities within our outside the HMA have requested help to meet unmet needs. While this may change in the future it is clear from the evidence presented in Chapters 5, 6 and 7 that there are limited opportunities to deliver the current housing requirement during the plan period let alone deliver additional growth to meet unmet needs from other areas.

Employment quantum

- 2.14 There are two documents which provide overarching quantitative assessment of employment land requirements: the 2017 ELR (AECOM) and the 2017 FEMA study (HJA). It should be noted that there are some differences in output between the ELR and FEMA. This is most noticeable in terms of industrial and warehousing (B2/B8) requirements.
- 2.15 The FEMA study informed the MoU for the distribution of the objectively assessed employment needs for the West Essex/ East Hertfordshire FEMA which was signed in May 2018. The agreed preferred scenario arising from the FEMA work includes 16,000 new jobs (2011-33) in Uttlesford District as well as 2-5 ha of offices and 22 ha of industrial space (2016-33).
- 2.16 Options were explored to deliver a higher and lower number of new jobs during the plan period in previous plan-making/ SA stages and rejected. There is no new evidence to suggest that these options should be revisited at this stage.

‘Bottom-up’ considerations

2.17 The higher level work above gives an understanding of the housing and employment requirement which would need to be delivered through sites within Uttlesford. There remains a need to develop an understanding of the supply of land within the district to deliver the remaining housing and employment requirement.

Garden Communities

Identification of GC options

- 2.18 Broad Areas of Search (AoS) were identified for new settlements early in plan-making based on their potential to contribute to effective cross-boundary strategic planning priorities; minimise the need to travel by car; leisure opportunities and other facilities; and access to strategic highways and rail network. Areas were excluded if they contained significant constraints, such as Registered Parks and Gardens or Sites of Special Scientific Interest (SSSIs).
- 2.19 New settlements need to be of sufficient size to support the required range of social and physical infrastructure. In line with this and in response to the Issues and Options consultation in 2015, Essex County Council advised that any new settlement would require its own secondary school as part of the provision. This would require a minimum of some 5,000 houses/flats to support this provision. Any new settlement(s) would therefore likely be in the range of 5,000 - 10,000 homes which would be developed over a 20 - 25 year period. As a result, the minimum capacity for a site to be considered a reasonable alternative for a new settlement is 5,000 dwellings.
- 2.20 The Call for Sites process and the Strategic Land Availability Assessment (SLAA) identified two sites in the district that fall within an AoS for a new settlement and also meet the minimum threshold of 5,000 dwellings to deliver a new secondary school. These are land to the North East of Great Chesterford (SLAA Ref: 10Gte15) within AoS 1, referred to as ‘North Uttlesford’ and land to the west of Great Dunmow and north of the A120 (SLAA Ref: 06LtEas15) in AoS 7, referred to as ‘Easton Park’.
- 2.21 Land was also identified within AoS 9 but the two component sites do not have sufficient capacity to deliver the minimum threshold of 5,000 dwellings for a new GC. However, on-going discussions with Braintree District Council through the duty to co-operate resulted in the identification of a potential for a joint new settlement comprising these two sites (SHLAA Ref: 05Ste15 and 06Ste15) within Uttlesford and land within Braintree District that could meet the minimum 5,000 dwelling threshold.
- 2.22 No other available sites have been identified through the Call for Sites or SLAA process that fall within or outside an AoS that could deliver a minimum of 5,000 new dwellings either during and/ or beyond the plan period.
- 2.23 While these four options are not reasonable for consideration as a GC, they do warrant further consideration as part of the development of wider spatial strategy alternatives, i.e. increased growth at the villages. This is discussed further later in this Chapter.

Exploring the capacity of the identified GC options

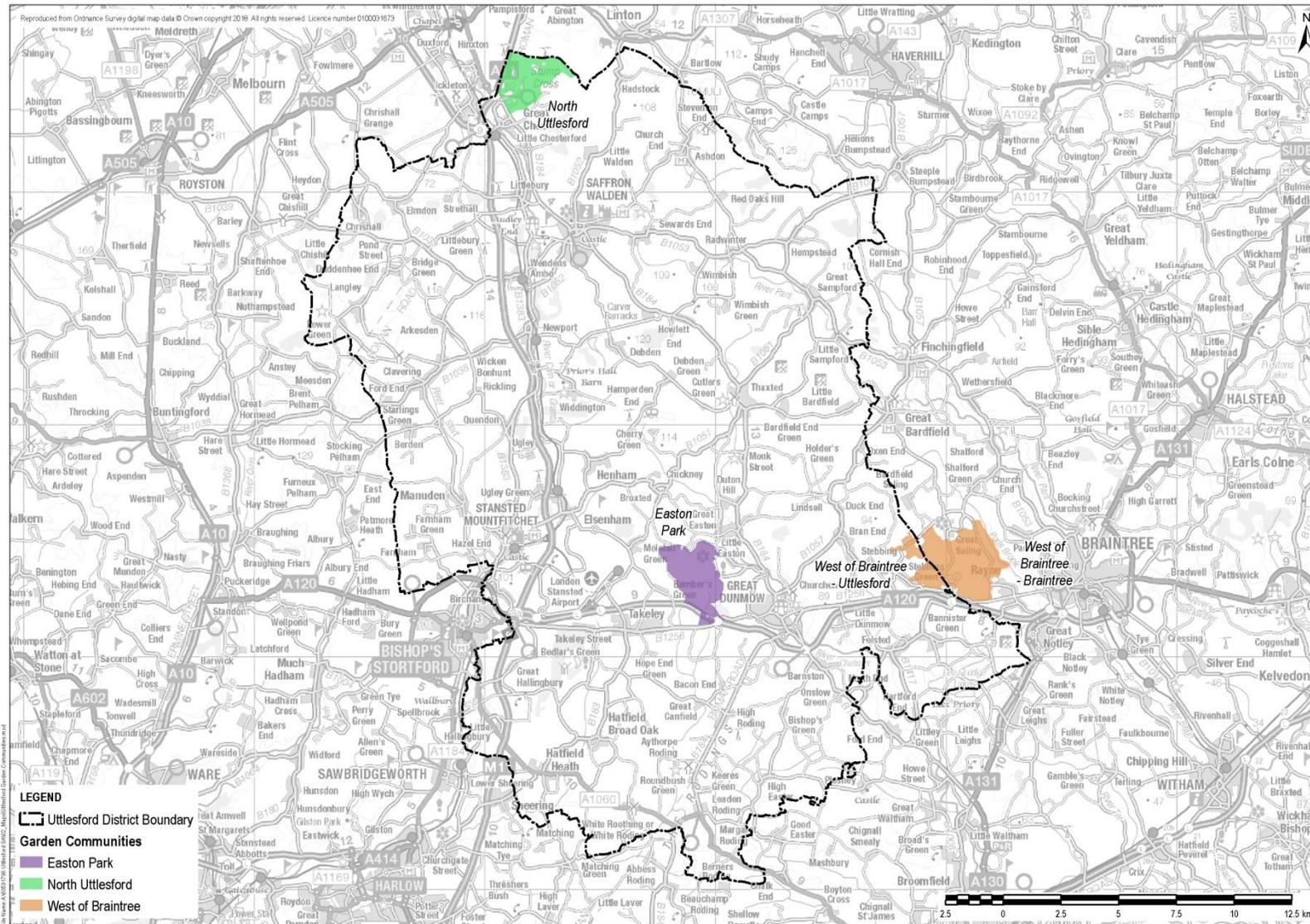
2.24 Taking the above into account, it is considered that there are only three reasonable site options that need to be explored for the delivery of new GCs. **Table 2.2** sets out the capacity of the options to deliver growth within the plan period (2011 to 2033), beyond the plan period (post 2033) and in total. This is based on the evidence as well as discussions with promoters and Braintree District Council.

Table 2.2: Garden Community options

Site	Delivery during plan period (up to 2033)	Delivery post plan period (post 2033)	Total delivery
North Uttlesford	1,925 dwellings	3,075 dwellings	5,000 dwellings
Easton Park	1,925 dwellings	8,075 dwellings	10,000 dwellings
West of Braintree	970 dwellings within Uttlesford District	2,530 dwellings within Uttlesford District	10,500 - 11,000 dwellings within Uttlesford and Braintree Districts

2.25 The three GC options are presented in **Figure 1** on the next page.

Figure 1: Garden Community options



- 2.26 For the North Uttlesford option there are limited opportunities to explore an increased level of growth above the 5,000 dwelling minimum threshold given the sensitivity of the landscape⁴ and historic environment⁵. A higher level of growth would not help to deliver additional mitigation or benefits that would reduce the significance of negative effects on the landscape or the historic environment. Exploring a lower level of growth is also not reasonable as it would then deliver less than 5,000 dwelling minimum threshold for a GC.
- 2.27 The Council has been in discussions with South Cambridgeshire District Council and Cambridgeshire County Council about the interaction between North Uttlesford and existing communities and new development in South Cambridgeshire. Cambridgeshire County Council are reasonably content that the transport evidence shows that there is deliverable mitigation for the likely impact of the proposed development on Cambridgeshire roads.⁶ South Cambridgeshire District Council remains concerned about the deliverability of transport solutions and landscape impacts on Cambridgeshire, whilst recognising the potential benefits North Uttlesford could have in terms of labour supply for the southern employment cluster, and secondary school provision for limited new housing near Hinxton.⁷
- 2.28 The delivery of 10,000 dwellings at the Easton Park option has been determined based on the various evidence base studies carried out (including landscape and heritage impact assessments) and through discussions with the promoters of the site. As for the North Uttlesford option, there are limited opportunities to explore a higher level of growth at this site given the sensitivity of the landscape and historic environment. A higher level of growth would not help to deliver additional mitigation or benefits that would reduce the significance of negative effects on the landscape or the historic environment. It is reasonable however, given the sensitivities of the site to explore an option for a lower level of growth that meets the minimum threshold of 5,000 dwellings for a new GC. It should be noted that it is assumed that a lower scale of growth would deliver less infrastructure improvements, including the proposed Rapid Transit Scheme (RTS).
- 2.29 The consideration of potential options for the capacity of the West of Braintree GC is limited to the areas of the site that fall within Uttlesford District. As noted above there are two separate sites within the district that both form part of the wider GC option along with land in Braintree District. The North Essex Garden Communities Concept Framework for West of Braintree⁸, identifies the 'southern part' of the site in Braintree as the preferred option. This particular distribution of development would result in the northern site in Uttlesford not adjoining the larger site on the Braintree side of the border. Consequently, there is reasonable alternative that looks at only the southern site in Uttlesford (Option 2a below).
- 2.30 Taking the above into account the following GC options have been identified for appraisal through the SA process:

⁴ Chris Blandford Associates (2017) Land at North Uttlesford Landscape & Visual Appraisal [online] available at: <https://www.uttlesford.gov.uk/article/4937/Environment> [accessed 20/11/18]

⁵ Historic England's response to the Regulation 19 Local Plan

⁶ Cambridgeshire County Council Position Statement: <https://www.uttlesford.gov.uk/article/4947/Transport>

⁷ South Cambridgeshire District Council's response to the Regulation 19 Local Plan

⁸ https://www.braintree.gov.uk/downloads/file/6370/garden_communities_-_west_of_braintree_concept_framework_may_2017

Table 2.3: Garden Community options for appraisal

Option	Delivery during the plan period (up to 2033)	Delivery total
Option 1: North Uttlesford	1,925 dwellings	5,000 dwellings
Option 2: West of Braintree	2a: Delivery on the southern site only within Uttlesford	8,500 - 9,000 dwellings (including 1,500 dwellings total on the southern site)
	2a: Delivery on the southern and northern site within Uttlesford	10,500 - 11,000 dwellings (including 3,500 dwellings total on the northern and southern site)
Option 3: Easton Park	3a: Reduced level of growth	5,000 dwellings
	3b: Preferred level of growth	10,000 dwellings

2.31 It should be noted that representations raised concerns that the emerging Local Plan places too much reliance on the GCs for the delivery of new homes during the plan period, referring to research on the speed and rate of delivery of large-scale housing developments.⁹ Taking this into account, it would seem prudent to explore alternative district-wide spatial strategies that rely less on the delivery of GCs during the plan period. This is explored further in the later section which seeks to establish reasonable district-wide spatial strategy alternatives.

Appraisal of the GC options

2.32 Each of the options identified in **Table 2.3** was subject to a comparative appraisal against the SA Framework. A summary of the appraisal findings are presented in **Table 2.4** below.

2.33 The appraisal table comprises a row for each of the objectives that make up the SA Framework (see **Table 1.1**). Within each row the alternatives are categorised in terms of potential to result in 'significant effects' (using **red/ green**) and also ranked in order of relative performance (with '=' used to denote instances where the alternatives perform on a par, i.e. it not possible to differentiate between them). If an option is ranked as 1 then it is preferred to an option that is ranked 2. Please note that the rank is not linked to the potential for a significant effect.

⁹ Nathaniel Litchfields & partners (2016) Start to Finish - How Quickly do Large-Scale Housing Sites Deliver? <https://lichfields.uk/media/1728/start-to-finish.pdf>

Table 2.4: Summary appraisal of the Garden Community options

Summary findings and conclusions					
Categorisation and rank					
SA Objective	Option 1: North Uttlesford (5,000 dwellings)	Option 2a: West of Braintree (8,500 - 9,000 dwellings - including 1,500 on southern site)	Option 2b: West of Braintree (10,500 - 11,000 dwellings - including 3,500 on both northern and southern site)	Option 3a: Easton Park (5,000 dwellings)	Option 3b: Easton Park (10,000 dwellings)
1: Biodiversity	2	4	4	1	3
2: Water quality and resources	2	3	3	1	3
3: Landscape	5	1	2	3	4
4: Soil/ sustainable use of land	1	2	4	1	3
5: Historic environment	4	1	2	3	4
6: Climate change	2	1	1	2	1
7: Reduce and control pollution	2	1	1	2	1
8: To reduce the risk of flooding	3	4	5	1	2
9: Sustainable methods of travel	2	1	1	2	1
10: Accessibility to services	3	1	1	2	1
11: Health and social inclusion	3	1	1	2	1
12: Housing	2	4	3	2	1
13: Resources and infrastructure	2	1	1	2	1
14: Education and skills	4	3	1	4	2
15: Employment	4	3	2	4	1

2.34 The appraisal found that for a number of the SA objectives, the GC options are likely to have a **significant negative effect**, and these are summarised below:

- Potential effects on designated **biodiversity**: whilst all of the options present biodiversity constraints that would need to be addressed, the full extent of the Easton Park site includes land adjacent to High Wood, Dunmow SSSI, and the West of Braintree options contain a Local Wildlife Site (LWS). These options are considered to have the potential for significant negative effects as a result of direct habitat loss (at the West of Braintree) and increased disturbance, noise, light and air pollution. However, it should be noted that the assessment has also identified significant potential under Option 3b at Easton Park to deliver positive effects through biodiversity enhancement/ net gain.
- Material changes to the **landscape**: the delivery of any of the GCs will develop large areas of previously undeveloped land, which will ultimately permanently change the rural landscape character in these areas of the district. Each of the GC options are in locations of high or moderate to high landscape and visual sensitivity, and each site contains certain areas which are particularly sensitive to development. Sensitive design and layout along with wider mitigation will be required to minimise impacts and any opportunities to provide new accessible and valued landscapes should be explored.

- Significant loss of key **soil resources**: the delivery of any of the GC options will result in a significant loss of greenfield and Grade 2 best and most versatile agricultural land with the potential for permanent significant negative effects.
- Development affecting the **historic environment**: the scale of growth proposed at each of the options will significantly change the historic rural character and setting of designated heritage assets within or close to these areas, with the potential for significant permanent negative effects. Each site contains designated and non-designated heritage assets that will need to be protected and where possible, enhanced through the development of the GCs. The North Uttlesford GC is identified as being particularly sensitive in terms of the landscape and historic environment.

2.35 The appraisal also found that for a number of the SA objectives, the GCs present opportunities for long term **significant positive effects**, and these are summarised below:

- Significant delivery of **housing** to meet the identified local needs.
- Improvements to **sustainable transport** options within the district: most notably the combined delivery of a new Rapid Transit System (RTS) with the Easton Park and West of Braintree sites that will support existing and future residents with increased sustainable access between Stansted Airport, the two GCs, Great Dunmow and Braintree, leading to positive effects against a number of SA objectives.
- Large scale development enabling **delivery of new physical and social infrastructure**: including the delivery of a new secondary school (under all options), and a new Country Park (under Option 3b).

2.36 While the appraisal did not identify any further significant effects, it did highlight some potential cumulative effects:

- The cumulative effect of significant growth at GCs has the potential to impact the Epping Forest Special Area of Conservation (SAC) as a result of decreased air quality (associated with the likely increase in traffic and congestion as a result of development). This is assessed in more detail through the accompanying Habitats Regulations Assessment (HRA); however, it is recommended that policy provisions seek contributions from development to support the ongoing mitigation and monitoring of effects on air quality in the vicinity of the Epping Forest SAC.
- Cumulatively, the delivery of mixed use development at the GCs will contribute to meeting employment needs in accessible locations, supporting increased self-containment within the GCs and a reduced need to travel.

Outline reasons for selection/ rejection of Garden Community options

2.37 Outline reasons for the rejection or progression of the GC options in light of the appraisal above and wider evidence are provided in **Table 2.5** below.

Table 2.5: Outline reasons for the selection or rejection of Garden Community options

Option		Outline reasons
Option 1: North Uttlesford		Development of new Garden Communities allows for the provision of substantial new infrastructure, including a secondary school. There is potential to provide good access to nearby employment sites and improved public transport links. While there are potential heritage and landscape impacts of the development, mitigation is proposed, and alternatives are assessed to have similar impacts.
Option 2: West of Braintree	2a: Delivery on the southern site only within Uttlesford	Development on only the southern part of this site is not preferred at this stage as the appraisal does not indicate significant benefits of this lower scale of development. While part of a larger site, a lower level of development would impact on the ability to provide infrastructure.
	2b: Delivery on the southern and northern site within Uttlesford	Development of new Garden Communities allows for the provision of substantial new infrastructure, including a secondary school. This cross boundary site has potential to provide good access to Braintree, Stansted Airport through the provision of a Rapid Transit System. While there are potential heritage and landscape impacts of the development, mitigation is proposed, and alternatives are assessed to have similar impacts.
Option 3: Easton Park	3a: Reduced level of growth	A reduced level of development is not preferred, as while the appraisal does indicate some benefits in terms of a reduced impact on biodiversity, and a somewhat reduced impact on heritage and landscape, there are also less positive impacts in terms of potential infrastructure provision.
	3b: Preferred level of growth	Development of new Garden Communities allows for the provision of substantial new infrastructure, including a secondary school. There is potential to provide good access to Stansted Airport and Great Dunmow through the provision of a Rapid Transit System. While there are potential heritage and landscape impacts of the development, mitigation is proposed, and alternatives are assessed to have similar impacts.

2.38 Taking the above into account Options 1, 2b and 3b were taken forward for consideration as part of the district-wide spatial strategy options.

Other site options

- 2.39 Along with the consideration of strategic site options, such as the Garden Communities, there is also a need to give consideration to the large number of smaller site options that have been submitted to the Council (otherwise known as ‘SLAA sites’).
- 2.40 Given the advanced stage in plan-making at this stage the SA explored if there is the potential for any additional growth at the towns and villages within the district over and above what is already being currently proposed through the emerging Local Plan. These additional or ‘omission’ sites could then be taken forward for further consideration in the development of alternatives for the district-wide spatial strategy.
- 2.41 The Call for Sites and SLAA process helped to identify specific locations for growth both within and outside the Areas of Search identified in 2015.
- 2.42 Various work-streams have focused on the task of examining the merits of individual site options in isolation, including analysis of proximity to constraint (e.g. SSSI) and opportunity (e.g. school) features using GIS software. Evidence base studies have also been carried out to determine if there is justification for the release of land from the GB¹⁰ or the CPZ¹¹. All of the sites submitted through the Call for Sites process were considered through the SA.
- 2.43 Further consideration of the site options around the towns and villages found that there were limited opportunities for additional growth without significant impacts, either as a result of environmental constraints or infrastructure capacity. A potential choice in terms of the direction of any additional growth was identified at the village of Takeley.

Takeley growth options

- 2.44 A large number of sites were submitted around the fringes of Takeley through the Call for Sites process. Sites to the north of Takeley between the A120 and settlement have been promoted for large-scale development at an early stage in plan-making. Initially the sites were being promoted for 1,700 dwellings; however, a reduced scale of 850 dwellings has also been considered through plan-making and the SA process. The sites (08Tak15, 09Tak15, 10Tak15 and 11Tak15) to the North of the settlement are being actively promoted. A larger scale of development at around 1,700 dwellings is not considered realistic or reasonable given identified constraints along the B1256 and Junction 8a of the M11. There are also identified issues in terms of traffic and atmospheric pollution impacts on Hatfield Forest SSSI, which is situated adjacent to the B1256. Furthermore, the northern area also falls within the CPZ. Despite the identified constraints, it is considered reasonable to explore a reduced scale of growth that could deliver around 750 dwellings, as the area is still being actively promoted and 750 dwellings could deliver a new primary school.
- 2.45 A potential alternative to the delivery of additional growth to the north of Takeley could be comprised of growth to the south at sites 03HBO15 and 04GtCan15. 03HBO15 is a greenfield site located in the South West of the village. It wraps around the site submitted at Bonningtons (02HBO15) and forms part of an extant planning permission for a golf course, hotel, conference centre and indoor leisure facilities. It has the potential to deliver approximately 275 dwellings.
- 2.46 There have been two applications for development on site 04GtCan15 in 2014 for 211 dwellings (UTT/14/2306/OP) and 2015 for 180 dwellings (UTT/14/3705/OP), which were both refused. Permission was refused due to harm to the rural character of the area and countryside (CPZ) as well as insufficient information on access, highways and design. Despite the refusals it is considered reasonable to explore the potential

¹⁰ <https://www.uttlesford.gov.uk/article/4937/Environment>

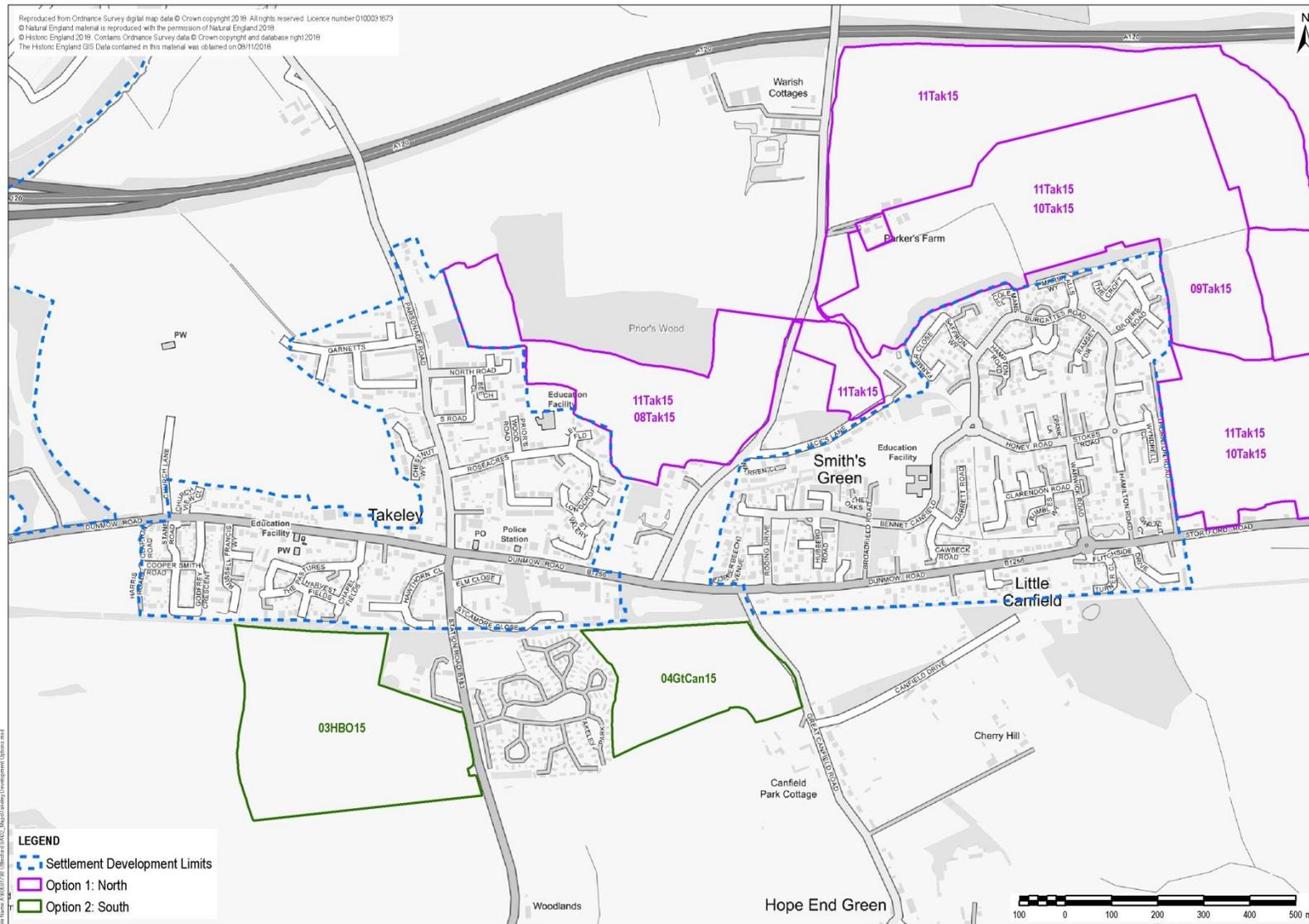
¹¹ Ibid.

for growth at this site given developer interest and the presence of Takeley Park Homes to the west. The SLAA identified that there is the capacity to deliver 211 dwellings at this site and this has been carried forward for further consideration.

2.47 Given the identified constraints it is not considered realistic to propose additional growth both to the north and south of Takeley. It would likely be a choice of one or the other; therefore, it is appropriate for these two options to be subject to further appraisal work prior to formulation of district-wide spatial strategy options. The two options for Takeley are identified in **Figure 2** and a description provided below:

- **Option 1:** Additional growth to the north - approx 750 dwellings distributed between sites 08Tak15, 09Tak15, 10Tak15 and 11Tak15. It is assumed that development will not cover the whole extent of the sites indicated on **Figure 2**. The option would seek to protect the countryside by keeping development to those sites adjacent to the existing development limits.
- **Option 2:** Additional growth to the south - approx 486 dwellings at sites 03HBO15 (275 dwellings) and 04GtCan15 (211 dwellings).

Figure 2: Takeley growth options



Appraisal of the Takely growth options

2.48 The growth options identified in **Figure 2** were subject to a comparative appraisal. A summary of the findings is presented in **Table 2.6** below along with outline reasons for why additional growth would be preferred in the north or south of the village.

2.49 The appraisal table comprises a row for each of the objectives that make up the SA Framework (see **Table 1.1**). Within each row the alternatives are categorised in terms of potential to result in 'significant effects' (using **red/ green**) and also ranked in order of relative performance (with '=' used to denote instances where the alternatives perform on a par, i.e. it not possible to differentiate between them). If an option is ranked as 1 then it is preferred to an option that is ranked 2. Please note that the rank is not linked to the potential for a significant effect.

Table 2.6: Summary appraisal of the Takely growth options

Summary findings and conclusions		
SA Objective	Categorisation and rank	
	Option 1: 750 dwellings north of Takeley Village	Option 2: 486 dwellings south of Takeley Village
1: Biodiversity	2	1
2: Water quality and resources	=	=
3: Landscape	2	1
4: Soil/ sustainable use of land	2	1
5: Historic environment	2	1
6: Climate change	1	2
7: Reduce and control pollution	2	1
8: To reduce the risk of flooding	2	1
9: Sustainable methods of travel	1	2
10: Accessibility to services	1	2
11: Health and social inclusion	=	=
12: Housing	1	2
13: Resources and infrastructure	=	=
14: Education and skills	1	2
15: Employment	=	=

2.50 The appraisal found that for a number of the SA objectives, development in Takeley Village poses a risk of **significant negative effects**, and these are summarised below:

- Potential effects on designated **biodiversity**: both options are likely to increase traffic on the B1256 north of Hatfield Forest SSSI as residents will use this route to access Junction 8 of the M11 as well as access the A120. This is likely to affect traffic along the B1256 and therefore air quality at the adjacent SSSI. Given the proximity of the SSSI to the settlement, it is also likely to be subject to increased recreational pressures. In line with advice from Natural England, it is recommended that Local Plan policy provisions seek contributions towards the

delivery of mitigation measures to address the likely impacts of recreational disturbance and decreased air quality at Hatfield Forest from all development falling within the emerging Zone of Influence (Zol) - which will include any development at Takeley.

- Material changes to the **landscape**: given the scale of growth proposed under both options at a village, it is considered that they are both likely to result in a residual significant negative effect on the character of the settlement.
- Significant loss of key **soil resources**: any development in Takeley Village is likely to result in significant loss of greenfield and Grade 2 best and most versatile agricultural land with the potential for permanent negative effects.
- Development affecting the **historic environment**: both options are likely to affect the setting of designated heritage assets in the Village with the potential for significant negative effects. Given that Option 1 is likely to impact the setting of a Grade I Listed Buildings (rarer and more significant than Grade II) and development is at a larger scale, the likely effects are considered to be of greater significance compared to Option 2.
- Impacts on **air quality**: the Transport Study predicts that without mitigation, the capacity of the B1256 will be exceeded at 2033 without development proposed through the Local Plan. Both of the options will increase traffic along the B1256 and at Junction 8 of the M11 in order to access the motorway and the A120, where there is identified congestion and existing air quality issues. The higher level of growth proposed under Option 1 is likely to have a negative effect of greater significance on traffic and therefore atmospheric pollution compared to Option 2.

2.51 The appraisal has also found that for a number of the SA objectives, development in Takeley Village presents opportunities for long term **significant positive effects**, and these are summarised below:

- Delivery of **housing** to meet the identified local needs.
- Larger scale development enabling **delivery of new infrastructure**: the delivery of 750 dwellings under Option 1 is considered to be of a sufficient scale to deliver a new primary school within the Village.

Outline reasons for selection/ rejection of Takeley growth options

2.52 On balance, Option 1 is preferred and taken forward for consideration as part of the district-wide spatial strategy options as the scale of development could provide a new primary school at the village, for which there is an identified need. The opportunity to deliver a primary school is considered to outweigh the negatives effects, which are primarily associated with an increased scale of development having greater impacts on environmental factors. Tied to this consideration is the fact that if there were to be less development in Takeley, there could be additional pressure to increase development in other more sensitive settlements.

Establishing the Reasonable Alternatives

Spatial strategy options

- 2.53 The evidence around housing supply has been updated and indicates that, as of April 2018, there have been 4,156 dwellings already built since the beginning of the plan period (April 2011). A further 3,364 dwellings have been granted planning permission. Including a windfall allowance of 1,050 dwellings (between 2018/19 and 2023/33), the total supply is therefore 8,570 dwellings.
- 2.54 The identified OAHN for the plan period is at least 14,000 new homes, plus the required 5% buffer to allow for flexibility gives a total housing requirement of at least 14,700 new homes for the plan period. Take the housing supply away and we are left with a shortfall or residual housing requirement of at least 6,130 dwellings during the life of the Local Plan.
- 2.55 Based on the evidence base, in particular the SLAA, the Council has sought to meet as much of this residual need on sites located at the main towns and villages in line with the settlement hierarchy and the identified development limits. The Regulation 19 Pre-Submission Local Plan proposes the delivery of an additional 1,082 dwellings at the main towns and 478 dwellings at the villages in line with the settlement hierarchy. Evidence suggests that significant additional growth at the main towns and villages is not possible due to constraints, and, if it were pursued there is a high likelihood of significant impacts on existing infrastructure and the setting of historic settlements. Based on the level of growth allocated at the main towns and villages there is still a residual requirement of 4,750 dwellings.
- 2.56 Taking this into account, the Council explored opportunities for the delivery of one or more new settlements from an early stage in plan-making. Only three GC options were identified at North Uttlesford, Easton Park and West of Braintree that could deliver the minimum threshold of 5,000 dwellings that would provide a higher order secondary school in line with comments from ECC. Evidence on the delivery of housing at these sites demonstrates that they each could only deliver a proportion of their total capacity during the plan period. As a result, in order to meet the residual housing requirement during the plan period there was a need to progress all three realistic options for new Garden Communities.
- 2.57 Building on the previous work and in light of the discussion above, Officers and AECOM (working in collaboration) were able to establish reasonable spatial strategy alternatives - i.e. a series of alternative packages of sites - for appraisal.
- 2.58 A number of representations on the emerging Local Plan raised concerns that it places too much reliance on the GCs for the delivery of new homes during the plan period, referring to research on the speed and rate of delivery of large-scale housing.¹² Taking this into account, it was therefore considered prudent to also explore alternatives that rely less on the delivery of GCs during the plan period.
- 2.59 Representations have also suggested that there should be additional growth directed towards the main towns and villages instead of the new GCs, despite the evidence demonstrating that this could have significant impacts on infrastructure capacity and the environment. As demonstrated earlier in this Chapter, further consideration has therefore been given to the potential for additional growth at these settlements.
- 2.60 Taking the above into account, four alternative spatial strategy options were identified and these are described in more detail below.

¹² Nathaniel Litchfields & partners (2016) Start to Finish - How Quickly do Large-Scale Housing Sites Deliver?
<https://lichfields.uk/media/1728/start-to-finish.pdf>

2.61 It is important to remember that a large proportion of development proposed under each of the options is comprised of committed development (completions, sites with existing planning permission and windfall). It is also important to note that the level of growth allocated at the main towns and villages through the Regulation 19 Pre-submission Plan is considered a constant for each option. The variation between options therefore reflects the following:

- Reduced delivery at the Garden Communities during the plan period;
- No Garden Communities delivered during the plan period; and
- Additional growth at the main towns and settlements, including the release of Green Belt land on the edge of Bishop's Stortford during the plan period.

Option 1: Preferred Option

2.62 This is the development strategy set out in the Regulation 19 Pre-submission Local Plan. It is a hybrid strategy with significant growth in three new settlements, but some additional growth in existing communities as well in line with the settlement hierarchy. The strategy recognises that the towns and larger villages offer sustainable locations for development but that there are significant constraints that limit large-scale town or village extensions. The approach seeks to realise the infrastructure benefits of concentrating development in new settlements as well as limiting the impact on existing communities.

Option 2: Reduced reliance on Garden Communities during the plan period

2.63 This option was developed to explore potential alternatives for meeting the residual housing requirement if the GCs delivered less housing during the plan period (up to 2033). This option assumes that the start date for the delivery of each GC is delayed by three years, which would result in a reduction of approximately 800 dwellings at both Easton Park and North Uttlesford GCs as well as 450 dwellings at the West of Braintree GC during the plan period. This leaves a residual total of 2,050 dwellings to meet the housing requirement of 14,700 dwellings. Two variations of this option were explored and further details are provided below.

Option 2a: Reduced reliance on Garden Communities and greater focus on Market Towns and Key Villages (with a railway station)

2.64 In seeking to meet the residual housing need from reduced delivery at the GCs, it was considered appropriate to first consider the potential for additional growth at the Main Towns, including land adjacent to Bishop's Stortford which falls just outside the district boundary. Following that, the potential for additional growth at the Key Villages with a train station was explored. Under this option the shortfall as a result of reduced delivery at the GCs during the plan period is made up by additional growth in the following areas:

- **Edge of Bishop's Stortford** - Additional growth delivered on sites 06Bir15 (350 dwellings) and 03GtHal15 (180 dwellings), which are both GB sites. A total of 530 dwellings.
- **Saffron Walden** - Additional growth delivered on sites 11Saf15 (100 dwellings) and 20Saf15 (100 dwellings). Including development proposed through Option 1 that gives a total of 515 dwellings for this settlement.
- **Great Dunmow** - Additional growth delivered on sites 09GtDun15 (80 dwellings) and 11GtDun15 (35 dwellings). Including development proposed through Option 1 that gives a total of 882 dwellings for this settlement.
- **Elsenham** - Additional growth delivered on sites 03Els15 (100 dwellings), 11Els17 (40 dwellings) and 06Els15 (350 dwellings). Including development proposed through Option 1 that gives a total of 660 dwellings for this settlement.

- **Great Chesterford** - Additional growth delivered at sites 03LtChe15 (200 dwellings) and 04LtChe15 (100 dwellings). Including development proposed through Option 1 that gives a total of 300 dwellings for this settlement.
- **Newport** - Additional growth delivered on site 04New15 (106 dwellings). Including development proposed through Option 1 that gives a total of 200 dwellings for this settlement.
- **Stanstead Mountfitchet** - Additional growth delivered on sites 07Sta15 (70 dwellings), 12Sta15 (100 dwellings), 17Sta15 (50 dwellings), 19Sta15 (15 dwellings) and 24Sta16 (70 dwellings). Including development proposed through Option 1 that gives a total of 345 dwellings for this settlement.

Option 2a: Reduced reliance on Garden Communities and greater focus on Villages where large-scale growth is being promoted

2.65 A large number of sites were submitted around the Key Villages without a train station and around some Type A and B villages through the Call for Sites process. Option 2b seeks to explore the potential for these sites to help meet the shortfall as a result of a reduced reliance on GCs during the plan period. Under this option the shortfall as a result of reduced delivery at the GCs during the plan period is made up by additional growth in the following areas:

- **Hatfield Heath** - Additional growth delivered at site 04HHEA15 (26 dwellings). Just the smaller PDL area of the site being promoted. A total of 26 dwellings.
- **Takeley** - Additional growth on sites to the north for 750 dwellings as could provide a new primary school (Parts of sites 08Tak15, 09Tak15, 10Tak15 and 11Tak15). Including development proposed through Option 1 that gives a total of 770 dwellings for this settlement.
- **Thaxted** - Additional growth delivered on sites 09Tha15 (23 dwellings) and 17Tha15 (25 dwellings). Including development proposed through Option 1 that gives a total of 68 dwellings for this settlement.
- **Type A and B Villages:**
 - **Little Dunlow:** Additional growth delivered on sites to the north of Little Dunlow (sites 02LtDun15 and 03LTDun15 (750 dwellings) previously referred to as Chelmer Mead;
 - **Felsted:** Additional growth delivered at 16Fel15 (15 dwellings) and 19Fel15 (23 dwellings);
 - **Barnston:** Additional growth delivered at 01Bar15 (23 dwellings); and
 - **Clavering:** Additional growth delivered at 07Cla15 (30 dwellings).
 - Including development proposed through Option 1 that gives a total of 975 dwellings for the Type A and B Villages.

Option 3: No Garden Communities

2.66 This option was developed to explore potential alternatives for meeting the residual housing requirement if the GCs do not deliver any housing during the plan period (up to 2033). Given the significant shortfall in the housing requirement this option would require all the additional growth identified above for Options 2a and 2b. Without the delivery of the GCs there is also the opportunity for additional growth in the following areas:

- **Great Dunmow** - Additional growth delivered at site 05LtEast15 (1,000 dwellings) as coalescence with the Easton Park GC is no longer an issue. Including development proposed through Option 1 and 2a that gives a total of 1,882 dwellings for this settlement.

2.67 **Table 2.7** on the following page sets out the four options in more detail.

2.68 It could be argued that additional options should be explored that include the delivery of just one or perhaps two of the three GC options. Particularly given Historic England's objection to the North Uttlesford GC in response to the Regulation 19 Pre-submission Local Plan. However, it is important to note that a comparative and independent appraisal of the three GC options has been carried out and this included variations in the total scale of growth that might be delivered at each of the options where feasible. The summary appraisal findings are presented earlier in this Chapter and this worked informed the development of the spatial strategy options. Furthermore, the four identified alternative spatial strategy options allow the SA to evaluate the likely significant effects and explore the differences between options that focus less or no growth at the GCs compared to increased growth and the district's towns and villages. It is therefore not considered necessary to identify and appraise any additional options.

Table 2.7: The reasonable spatial strategy alternatives

	Option 1: Preferred option	Option 2a: Reduced reliance on GCs greater focus on Towns / Key Villages (with a train station)	Option 2b: Reduced reliance on GCs greater focus on other Villages	Option 3: No Garden Communities
Constants				
Completions (April 2018)	4,156	4,156	4,156	4,156
Permissions (April 2018)	3,364	3,364	3,364	3,364
Windfall (2018/19 - 2032/33)	1,050	1,050	1,050	1,050
Constants Total	8,570	8,570	8,570	8,570
Choices				
Towns				
Edge of Bishop's Stortford	0	530	0	530
Saffron Walden	315	515	315	515
Great Dunmow	767	882	767	1,882
Town Total	1,082	1,927	1,082	2,927
Villages				
Elsenham	170	660	170	660
Great Chesterford	0	300	0	300
Latfield Heath	0	0	26	26
Newport	94	200	94	200
Stanstead Mountfitchet	40	345	40	345
Takeley	20	20	770	770
Thaxted	20	20	68	68
A and B Villages	134	134	975	975
Village Total	478	1,679	2,143	3,344
Garden Communities				
Easton Park	1,925	1,125	1,125	0
North Uttlesford	1,925	1,125	1,125	0
West of Braintree	970	520	520	0
Garden Communities Total (up to 2033)	4,820	2,770	2,770	0
Total dwellings during the plan period	14,950	14,946	14,565	14,841
% over OAHN (14,000 dwellings)	7%	7%	4%	6%

Employment land options

2.69 Compared to the outputs of the ELR (2017) and FEMA study (2017) the Regulation 19 Pre-Submission Local Plan includes substantial over provision in purely quantitative terms. This is largely a result of large allocations at North Stansted and Chesterford Research Park.

2.70 The enlargement of the allocation at Chesterford Research Park is a given in all scenarios, as this is the only large-scale Science Park in the district and it is linked with the successful 'Cambridge phenomenon', growth here is able to provide highly skilled jobs that will support the local and national economy. The options in the area of the airport regarding the location of strategic employment land to meet the needs of the district is between allocating land at North Stansted and allocating land at Gaunt's End. North Stansted is an area with existing structure that is currently reserved for 'airport related uses'; however, this has been the case for a long time, and it is apparent that there is no need for this land for airport related uses. Gaunt's End is an area to the north of the airport within the Countryside Protection Zone that has a significant existing permission for new office and retail space. The proposal at Gaunt's End is to expand the site for further employment space, beyond the existing extant permission.

2.71 At this stage, the reasonable options for the allocation of strategic employment land are as follows:

- **Option 1:** Allocating employment land at Chesterford Research Park and North Stansted;
- **Option 2:** Allocating employment land at Chesterford Research Park and Gaunt's End; and
- **Option 3:** Allocating employment land at Chesterford Research Park, North Stansted and Gaunt's End.

Appraisal of the Reasonable Alternatives

Spatial strategy options

2.72 The spatial strategy options identified in **Table 2.7** were subject to a comparative appraisal against the SA Framework and summary findings are presented in **Table 2.8** below.

2.73 The appraisal table comprises a row for each of the objectives that make up the SA Framework (see **Table 3.1**). Within each row the alternatives are categorised in terms of potential to result in 'significant effects' (using **red/ green**) and also ranked in order of relative performance (with ' = ' used to denote instances where the alternatives perform on a par, i.e. it not possible to differentiate between them). If an option is ranked as 1 then it is preferred to an option that is ranked 2. Please note that the rank is not linked to the potential for a significant effect.

Table 2.8: Summary appraisal of the spatial strategy options

Summary findings and conclusions				
SA Objective	Categorisation and rank			
	Option 1: Preferred option	Option 2a: Less at GCs more at Towns/ Villages (with a train station)	Option 2b: Less at GCs more at other Villages	Option 3: No Garden Communities
1: Biodiversity	1	2	3	4
2: Water quality and resources	=	=	=	=
3: Landscape	=	=	=	=
4: Soil/ sustainable use of land	=	=	=	=
5: Historic environment	=	=	=	=
6: Climate change	1	1	2	3
7: Reduce and control pollution	1	2	3	4
8: To reduce the risk of flooding	=	=	=	=
9: Sustainable methods of travel	1	1	2	3
10: Accessibility to services	1	2	3	4
11: Health and social inclusion	1	2	2	3
12: Housing	2	1	1	1
13: Resources and infrastructure	1	1	1	2
14: Education and skills	1	2	2	3
15: Employment	1	1	1	2

2.74 The appraisal found that for a number of the SA objectives, the spatial strategy options have the potential for a **significant negative effect**, and these are summarised below:

- Potential effects on designated **biodiversity**: all of the options will result in localised impacts on biodiversity where development is focussed as a result of the loss and fragmentation of habitats as well as increased disturbance (noise, light and recreation) to habitats/ species. Natural England (NE) raised two key issues that need to be addressed in relation to the development proposed through the emerging Local Plan; increased atmospheric pollution and recreational pressure to

Epping Forest SSSI and SAC and Hatfield Forest SSSI. Uttlesford District falls outside the 6.2km zone of influence for recreational pressure impacts to Epping Forest SAC and SSSI so NE is satisfied that this issue can be screened out for the emerging Local Plan. The issue of increased atmospheric pollution to the Epping Forest SAC and SSSI is being addressed through the HRA process for the Local Plan. The National Trust, who own and manage Hatfield Forest SSSI and National Nature Reserve (NNR), commissioned visitor surveys that demonstrate that there is unsustainable recreational pressure, in the winter months, which is damaging parts of Hatfield Forest. The findings of the winter visitor survey show a zone of influence (Zol) for recreational pressure of 10.4 km radius from the site, and this zone may extend further once summer visitor surveys have been analysed. Natural England advises that the Uttlesford Local Plan should include policy requirements for development within the Zol (once fully defined) to provide a contribution towards delivery of appropriate mitigation measures, once agreed. Taking the above into account, it is reasonable to assume that the spatial strategy options which direct a higher level of growth within the emerging Zol are more likely to have impacts at Hatfield Forest SSSI in terms of increased recreational pressure. This is an issue for additional growth proposed at a number of settlements (edge of Bishop's Stortford, Great Dunmow, Stansted Mountfitchet, Elsenham, Takeley, Hatfield Heath and Little Dunmow) and Easton Park GC, and options that direct more development towards these settlements (Options 2b and 3) are considered to have the greatest potential for significant negative effects.

- Material changes to the **landscape**: all options are predicted to have a residual significant negative effect as a result of the introduction of development in previously undeveloped areas. It is noted however that the overall significance of the effects will ultimately be dependent upon the design/ layout of development as well as the implementation of mitigation measures. Options 2a, 2b and in particular 3 are more likely to have impacts on the landscape character surrounding and townscape of the towns and villages.
- Significant loss of key **soil resources**: all options will result in significant loss of greenfield and Grade 2 Best and Most Versatile agricultural land with the potential for permanent negative effects.
- Development affecting the **historic environment**: all of the options will result in localised impacts on the historic environment depending on where the additional growth is directed and all are predicted to have a residual significant negative effect. While the development of the GCs, in particular the North Uttlesford GC, has the potential for a significant negative effect on the historic environment; the alternatives of reducing or delivering no growth at the GCs and increasing the scale of growth at the historic towns and villages within the district is also likely to result in a significant negative effect on the historic environment.
- Capturing benefits in terms of **infrastructure delivery**: Option 3 is also predicted to lead to significant negative effects on SA Objectives 7, 13 & 14 as will not help to reduce the need to travel and will not encourage a modal shift to the use of sustainable transport modes. It is more likely to continue the current trend of private vehicle use and does not capitalise on opportunities to deliver new physical and social infrastructure as a result of large-scale development; such as the delivery of the Rapid Transit System (RTS) and new secondary schools to serve the district.

2.75 The appraisal has also found that for a number of the SA objectives, the spatial strategy options present opportunities for long term **significant positive effects**, and these are summarised below:

- Significant delivery of **housing** to meet the identified local needs: all options will significantly contribute to meeting housing needs. However, Options 2a, 2b and 3

are preferred as they are more likely to deliver housing earlier in the plan period, and thus reduce risk overall in terms of meeting identified needs.

- Larger-scale development enabling **delivery of new infrastructure**: larger scale growth proposed under Options 1, 2a and 2b provide significant opportunity to deliver improvements to social and physical infrastructure when compared to the smaller scale development proposed under Option 3.
- Developing in **accessible locations**: Options 1 and 2a are considered to have the potential for significant long term positive effects for accessibility and climate change mitigation as they are more likely to promote sustainable transport modes and reduce the need to travel.

Strategic employment land

2.76 The employment options identified in earlier in this Chapter were subject to a comparative appraisal against the SA Framework and summary findings are presented in **Table 2.9** below.

Table 2.9: Summary appraisal of the strategic employment land options

Summary findings and conclusions			
SA Objective	Categorisation and rank		
	Option 1: Strategic employment allocations at Chesterford Research Park and North Stansted	Option 2: Strategic employment allocations at Chesterford Research Park and Gaunt's End	Option 3: Strategic employment allocations at Chesterford Research Park, North Stansted and Gaunt's End
1: Biodiversity	1	1	2
2: Water quality and resources	=	=	=
3: Landscape	1	2	3
4: Soil/ sustainable use of land	1	2	2
5: Historic environment	1	2	3
6: Climate change	2	1	3
7: Reduce and control pollution	1	1	2
8: To reduce the risk of flooding	2	1	2
9: Sustainable methods of travel	2	1	2
10: Accessibility to services	=	=	=
11: Health and social inclusion	=	=	=
12: Housing	=	=	=
13: Resources and infrastructure	2	1	3
14: Education and skills	=	=	=
15: Employment	=	=	=

2.77 The appraisal found that for a number of the SA objectives, the options have the potential for a **significant negative effect** and these are summarised below:

- Significant loss of key **soil resources**: development at any of the allocations is likely to result in the loss of Grade 2 best and most versatile agricultural land with the potential for permanent negative effects. This loss is considered most significant at the Gaunt's End site.

- Development affecting the **historic environment**: there is a listed building at the Gaunt's End site and its setting is likely to be significantly affected by development. Whilst it is anticipated that the listed building will be retained on site, the type of development proposed (employment land) is considered likely to affect the setting of the listed building, which is a one storey timber framed cottage located in the centre of the site.
- Impacts on **air quality**: options are considered likely to increase traffic on the M11 and congestion around Junctions 8 and 9, which are all sensitive air quality areas. In this respect, development is considered likely to exacerbate existing air quality issues with the potential for significant long term negative effects. Overall, there are no significant differences between Options 1 and 2; however, Option 3 is considered to perform worse due to the greater scale of development and therefore increased levels of traffic and congestion.

2.78 The appraisal has also found that the delivery of strategic employment land to meet the identified needs (to include a buffer) has the potential for long term **significant positive effects** on SA Objective 15 relating to the economy.

Developing the preferred approach

Introduction

2.79 This section presents the Council's response to the alternatives appraisal and the Council's reasons for selecting its preferred approach in light of alternatives appraisal and other factors.

The Council's outline reasons for choosing the preferred approach

Spatial strategy

- 2.80 The following text is in the form of a general discussion of the reasoning and justification behind the preferred option.
- 2.81 The preferred approach is a hybrid strategy that seeks to focus development at the existing market towns of Saffron Walden and Great Dunmow and the three new Garden Communities of Easton Park, North Uttlesford and West of Braintree. This seeks to focus development on the most sustainable locations as to minimise the need to travel and maximise the opportunities for trips by sustainable modes. Significant development in the new Garden Communities also seeks to meet the housing needs of the district while minimising the impact of new development on existing communities, which have seen substantial impacts in recent years through incremental growth. Focussing development in the Garden Communities also provides better opportunities for upfront, deliverable infrastructure provision for meeting the needs of the development than the alternative options.
- 2.82 Significant additional levels of development at the market towns, beyond the preferred approach, is not preferred as the transport and air quality issues in Saffron Walden are limiting as well as the heritage and landscape restraints to the north and west; and the levels of committed development in Great Dunmow means that further development is likely to have significant negative impacts. Further development at the Key Villages with a railway station is also not preferred. Development around these villages is likely to have significant negative impacts on heritage, coalescence with surrounding villages, furthermore, the development is likely to further impact on local infrastructure without being of a suitable scale to provide new secondary schools or other required improvements. In particular: Elsenham has significant access and transport issues; Great Chesterford has heritage assets to the north, and potential coalescence to the south; Hatfield Heath is surrounded by Green Belt; Newport has landscape and

heritage constraints; Stansted Mountfitchet has Green Belt to the south, and further development to the north or east risks coalescence with Elsenham and development being too far away from the core of the village and railway station; development at Takeley is likely to have greater impacts on Hatfield Forest, and potential impacts on the Countryside Protection Zone; and development at Thaxted is likely to have significant landscape and heritage impacts.

Strategic employment land

2.83 The enlargement of the allocation at Chesterford Research Park is a given in all scenarios, as this is the only large-scale Science Park in the district and it is linked with the successful 'Cambridge phenomenon', growth here is able to provide highly skilled jobs that will support the local and national economy. The options in the area of the airport regarding the location of strategic employment land to meet the needs of the district is between allocating land at North Stansted and allocating land at Gaunt's End. North Stansted is an area with existing structure that is currently reserved for 'airport related uses', however this has been the case for a long time, and it is apparent that there is no need for this land for airport related uses. Gaunt's End is an area to the north of the airport within the Countryside Protection Zone that has a significant existing permission for new office and retail space. The proposal at Gaunt's End is to expand the site for further employment space, beyond the existing extant permission. North Stansted is the preferred option as this is an area of previously developed land not within the Countryside Protection Zone (CPZ). The CPZ is a longstanding policy that seeks to ensure the Stansted Airport remains and 'airport within the countryside', further encroachment at Gaunt's End undermines the purposes on the CPZ.

3. Appraisal findings at this stage

Introduction

- 3.1 Part 2 of the SA Report answers the question - What are appraisal findings at this stage? - by presenting an appraisal of the Proposed Submission Draft Local Plan. Appraisal findings are presented under nine sustainability topic headings (see Table 1, above), with each narrative ending in concluding paragraphs, which are provided below.

Appraisal of the Local Plan

SA objective 1: to conserve and enhance biodiversity (habitats, species and ecosystems) within the District

- 3.2 Overall, the Local Plan is seeking to meet identified housing, employment and infrastructure needs and this will result in the loss and fragmentation of habitats as well as increased disturbance (noise, light and recreation) where this development is located. To minimise the impacts of development (including those identified as a result of the spatial strategy) the Local Plan includes policies that seek the protection of key habitats and ecological features, as well as enhancements where possible. This includes the provision of new habitats, improvements to ecological connectivity, and by seeking biodiversity net gain through the delivery of the GCs. However, the potential for positive effects is uncertain at this stage. The Local Plan includes allocations that are likely to fall within the emerging Zol for and/ or increase atmospheric pollution at Hatfield Forest SSSI. In line with advice from Natural England, it is recommended that the Local Plan includes a requirement for all development located within the emerging Zol to provide contributions towards the delivery of mitigation measures to address the likely impacts of recreational disturbance and decreased air quality at Hatfield Forest.
- 3.3 On balance, while there is the potential for both positive and negative effects, the overall level of growth is considered likely to have a **residual minor long term negative effect** on biodiversity.

SA objective 2: to conserve and enhance water quality and resources and help achieve the objectives of the Water Framework Directive

- 3.4 Whilst the spatial strategy will have implications for rivers running through the Plan area, it is considered that mitigation available at the development management level could significantly reduce the potential for negative effects, and enhance the potential for development to deliver positive effects in terms of ecological quality enhancements in this area. In line with the Water Cycle Study recommendations, there could be opportunities to encourage the conservation of water in new development to minimise negative effects on water resources. It is also expected that development at any of the allocations can deliver mitigation (for example rainwater harvesting measures) to support reduced water use per person per day.
- 3.5 It is predicted that the Local Plan will have a **residual neutral effect** on this SA objective.

SA objective 3: to conserve and enhance the District's landscape character and townscapes

- 3.6 Development proposed through the Local Plan is likely to have a negative effect on the landscape, in particular the rural character in the areas where the GCs are proposed. Local Plan policies seek to ensure that development retains and enhances the key landscape areas, and the overall landscape character and rural setting, to reduce the extent and significance of the inevitable effects as a result of growth to meet identified needs. On balance, it is predicted that the Local Plan has the potential for a significant residual negative effect on the landscape. This is primarily as a result of the delivery of three new GCs that will permanently alter the rural character of those areas. However, it is recognised that this strategy also helps to minimise impacts on the landscape/ townscape around the existing towns and villages within the district. It is also recognised that only a proportion of the GCs will be delivered during the plan period and as a result mitigation may not be fully implemented or established until the GCs are fully built out.
- 3.7 Development proposed through the Local Plan is likely to have a **significant negative effect** on the landscape, in particular the rural character in the areas where the GCs are proposed.

SA objective 4: to conserve and enhance soil and contribute to the sustainable use of land

- 3.8 Development at the proposed GCs will inevitably result in the significant loss of greenfield land and Grade 2 Best and Most Versatile (BMV) agricultural land; with the potential for significant permanent negative effects on soil resources. The Local Plan seeks to minimise any further effects on agricultural land resources where possible and identifies brownfield sites within the settlements. However, given the predominantly rural nature of the district, these do not make a significant contribution in helping to meet identified needs.
- 3.9 It is predicted that the Local Plan will have a **significant permanent negative effect** on this SA objective.

SA objective 5: to maintain and enhance the District's cultural heritage assets and their settings

- 3.10 The spatial strategy focuses substantial development at the GCs and this will help to protect the historic settlements within the district for which a number already have a significant level of committed development.
- 3.11 Whilst development proposed through the Local Plan will inevitably significantly change the landscape and townscapes of areas within the district, the Local Plan policies seek to ensure that development retains and enhances the significance of the historic environment and heritage assets and their settings (including designated and non-designated sites). Protection is also provided to ensure that development appropriately considers archaeology as a prominent historic asset within the district. The policies are likely to reduce the extent of the negative effects identified, however the overall impact remains uncertain at this stage as it is ultimately dependent on successful design, layout and integration.
- 3.12 On balance, it is likely that development will lead to at least a **residual minor negative effect** given the scale of growth proposed within a rural historic setting. However, this is considered alongside the merits of delivering the GCs away from the main historic settlement areas which would otherwise be subject to significantly higher levels of growth. It is also recognised that only a proportion of the GCs will be delivered during

the plan period and as a result mitigation may not be fully implemented or established until the GCs are fully built out.

SA objective 6: to reduce contributions to climatic change

- 3.13 The level of growth proposed through the Local Plan will inevitably lead to negative effects on climate change in terms of increased traffic and congestion affecting air quality. However, it is recognised that the spatial strategy seeks to locate the growth in the most sustainable locations that can support sustainable transport solutions and a reduced need to travel, and reduce per capita emissions and overall contributions to climate change. It should be noted that the Transport Study (2016 and updates in 2017 and 2018) identified that committed development is likely to have the greatest impact on traffic compared to the additional growth proposed by the Local Plan. The delivery of the GCs and Rapid Transit System, and commitments under London Stansted Cambridge Corridor Vision will improve opportunities for sustainable transport with the potential for significant long term positive effects. This is supported by Local Plan policies that seek sustainable design, construction and energy efficiency to further support climate change mitigation with the potential for minor long term positive effects.
- 3.14 On balance, while there is the potential for both positive and negative effects, the overall level of growth proposed through the Local Plan is likely to lead to a **residual minor negative effect** on climate change mitigation.

SA objective 7: reduce and control pollution

- 3.15 It is recognised that significant growth proposed through the Plan will inevitably lead to negative effects in terms of increased traffic and congestion affecting air quality. However, the spatial strategy seeks to minimise residual adverse effects where possible in this respect; locating growth in the most sustainable locations that can support sustainable transport solutions and a reduced need to travel. The spatial strategy focuses the majority of development at the three GCs which are not located within Air Quality Management Areas (AQMAs) nor poor air quality zones, and seek to deliver a high level of self-containment.
- 3.16 Further to this, alongside the delivery of transport and infrastructure improvements, the provisions of the Local Plan seek to reduce the extent and significance of these inevitable effects in facilitating growth. Despite this, a **residual minor negative effect** is still predicted at this stage.

SA objective 8: to reduce the risk of flooding

- 3.17 The Plan policies seek to ensure that the risk of flooding is fully considered as part of new development proposals. While it is recognised that a number of watercourses flow through the district, it is also noted that over 96% of the district lies within Flood Zone 1 where there is a low probability of fluvial flooding. The Plan requires that the proposed Garden Communities and site allocations proposed for development are, as far as possible, outside areas known to be at risk from flood risk or are required to provide appropriate mitigation and safeguards. In this context, the Council will work with the Environment Agency, developers and the Lead Local Flood Authority to achieve sustainable local flood mitigation measures as part of development.
- 3.18 It is recognised throughout the Plan that surface water flooding is also a constraint for the district, and as such development proposals must incorporate SuDS, which will achieve multiple flood risk benefits.
- 3.19 On balance, it is appropriate to conclude a **residual neutral effect** at this stage, i.e. it is not possible to conclude positive or negative effects on the baseline.

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

- 3.20 The Plan recognises that new development should be linked to existing services and facilities and therefore capitalises upon the opportunity to develop homes in locations where residents have reduced travel between home, job and services and facilities, promoting sustainable transport. To this effect, the new GCs will be highly self-sufficient, located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.
- 3.21 It is recognised that given the rural nature of the district, new residents, including those within the GCs, are likely to look outside of the district to access wider services and employment (e.g. within Cambridge, Bishop's Stortford or Braintree) with the potential for cross-boundary negative effects on traffic, highways infrastructure and parking. This is considering the district's limited transport network and existing capacity issues along the M11 and A120 corridors and rail links to London and Cambridge (Transport Strategy, 2017). The plan seeks to avoid and reduce the significance of these effects as much as possible through the provision of new and improved infrastructure delivered at the appropriate time as well as other mitigation measures through plan policies. Notably, Policy TA4 (New Transport Infrastructure or Measures) includes the provision of strategic and local highways improvements, rail improvements, walking and cycling improvements, and rapid transport corridors.
- 3.22 Therefore, based on currently available information, the improvement schemes/ measures mentioned above and detailed within the Transport Strategy are expected to address forecast traffic conditions at key network locations. It is however noted that additional complementary highway improvements and sustainable transport measures may need to be identified through the planning application process for delivery by developers.
- 3.23 On balance, while the evidence suggests that the most significant impacts of proposed development on the highway network can be mitigated, there is still likely to be some **residual minor long term negative effects** in terms of encouraging the use of sustainable travel. This is given the rural nature of the district and the level of development proposed.

SA objective 10: to ensure accessibility to services

- 3.24 It is considered that the Plan focuses growth where people will have better access to facilities and the opportunity to make best use of public transport. However, given the rural nature of the district it is considered that there may remain pockets of deprivation, and a level of pressure on the services and facilities within the Market Towns. Many people live in smaller settlements with facilities concentrated in centres outside of the district and in Saffron Walden and Great Dunmow. As such, service infrastructure proposed through the Plan seeks to contribute positively towards reducing increased pressure on the key centres (IDP, 2018).
- 3.25 In line with Garden Community principles (Policy SP5) the three GCs will deliver high levels of self-containment; providing new residents with access to services and facilities including employment, schools, recreation, shopping facilities, greenspaces and integrated transport systems. Further to this it is recognised that phasing, infrastructure and delivery plans will form part of the development plan document for each Garden Community, establishing the scale and pace of growth, where development will take place and when. This will contribute positively towards ensuring access to services, guaranteeing that the needs of the new communities are met as and when the need arises; and impacts on surrounding settlement are minimised.

- 3.26 On balance, it is considered appropriate to conclude that the Plan would have **significant positive long-term effects** in terms of ensuring accessibility to services.

SA objective 11: to improve the population's health and promote social inclusion

- 3.27 The delivery of the Plan will benefit residents through providing housing, employment, infrastructure, facilities, and services as set out within the IDP (2018). In this context, in line with Policy SP5 (Garden Community Principles) the GCs will be underpinned by high quality urban design and placemaking principles; delivering well-planned, beautifully and imaginatively designed development which promotes self-containment.
- 3.28 The wider Plan seeks to ensure there is sufficient access to green infrastructure, in accordance with the need identified through the IDP (2018). Development seeks to enhance the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains where possible. This will contribute towards the development of walkable, vibrant sociable neighbourhoods; leading to positive effects in terms of promoting social inclusion and improving health.
- 3.29 It is recognised that there may be potential for some adverse effects in terms of pressure on infrastructure outside of the Garden Communities; as highlighted through the IDP (2018). Site specific and district-wide policies are however proposed that provide a variety of measures to ensure that the negative impacts of growth on the communities outside of the GCs are minimised, and potential opportunities are realised.
- 3.30 Additionally, policies are co-ordinated to deliver a positive effect on the district's main settlements, providing new homes and infrastructure to meet localised need throughout the settlements. This may contribute positively towards reducing localised deprivation.
- 3.31 On balance, it is appropriate to conclude that the Plan would have **significant positive long term effects** in terms of improving the population's health and promoting social inclusion.

SA objective 12: to provide appropriate housing and accommodation to meet existing and future needs

- 3.32 The Plan will deliver a significant number of new homes (including a mix of types, sizes and tenures, including a proportion of affordable housing) to meet existing and future housing needs of the district. This in line with the conclusions of the SHMA (2017), and the signed MoU (2017) with neighbouring authorities, taking into consideration population projections, affordable housing needs and jobs growth.
- 3.33 Taking the existing supply into account means that the Local Plan needs to deliver 5,751 dwellings on new sites. The distribution of development across the district has been determined having regard to: the spatial vision and objectives; the settlement hierarchy; conformity with national policy; and the suitability, availability and deliverability of sites. In this context, delivering a significant proportion of growth through the GCs will contribute positively towards the delivery of affordable housing, with the potential for significant long term positive effects in this respect. This is supported by the policies within the housing section of the plan (Policies H1-H11) which require 40% affordable housing provision on sites delivering over eleven dwellings (Policy H6).
- 3.34 Further policies within the Plan seek to ensure that housing is delivered at the right scale and in the right location to meet community needs. The Plan recognises the role of the district within the LSCC and utilises the opportunity to capitalise on its transport

connections (namely the M11 motorway and London Stansted Airport). The spatial strategy therefore distributes the remaining housing requirement to sustainable locations throughout the district, in accordance with the settlement hierarchy, and reflecting the most up to date local housing need evidence.

- 3.35 Overall it is considered that the Plan will lead to **significant positive long term effects** in terms of providing appropriate housing and accommodation.

SA objective 13: to promote the efficient use of resources, including land and ensure the necessary infrastructure to support sustainable development

- 3.36 Development proposed through the Local Plan has the potential for impacts on the quality and quantity of natural resources. The Plan will result in the loss of greenfield land, directing a large proportion of growth to the three GCs and the Market Towns of Saffron Walden and Great Dunmow. The distribution of development across the district has been determined having regard to: the spatial vision and objectives; the settlement hierarchy; conformity with national policy; and the suitability, availability and deliverability of sites. It is therefore recognised that opportunities to utilise previously developed land have been exhausted, with site allocations located on brownfield land where possible.
- 3.37 Given the extent of the Mineral Safeguarding Sites throughout the district, it is considered that the Plan proactively addresses mineral resource sterilisation matters, recognising that mineral resources need to be protected from incompatible/ sensitive development nearby which might constrain mineral production in the future.
- 3.38 It is anticipated that the GCs will contribute positively towards ensuring the provision of sufficient infrastructure in line with projected increases in population. However, it is recognised that infrastructure surrounding the settlements outside of the GCs may experience increased pressure; particularly in terms of sustainable transport infrastructure.
- 3.39 On balance, it is appropriate to conclude **long term minor negative effects**; however, this conclusion is uncertain, given that there would be a loss of resources under a 'no plan' (or 'future baseline') scenario and that all the alternatives would result in a similar conclusion.

SA objective 14: to improve the education and skills of the population

- 3.40 Development proposed through the Local Plan will contribute positively towards improving the education and skills of the population, in line with the Vision of the LSCC. The three GCs will benefit residents through new education provision, delivering new primary schools and secondary schools along with other associated provision. Further to this, education provision within the Market Towns will have a positive effect on the district's residents, both within these key settlements and in surrounding centres. However, reliance on the car to access secondary schools is likely to continue given the high proportion of the district residing outside of the Market Towns, Stansted Mountfitchet and Newport and the rural nature of the district.
- 3.41 Delivering secondary and higher education, specifically through the development of Harlow College, will contribute positively towards maintaining the high level of skills within the district, and the reflected high level of employment. On balance, it is appropriate to conclude that the Plan would have **significant long term positive effects** in terms of improving the education and skills of the population.

SA objective 15: to ensure sustainable employment provision and economic growth

- 3.42 The Local Plan sets out a clear approach to supporting the growth and location of businesses in the district, safeguarding existing employment land and providing for a mix and range of employment sites. The GCs in particular will provide a wide range of local jobs within easy commuting distance from homes, supporting self-containment.
- 3.43 It is considered that the Plan presents a sufficient supply of employment land to meet local needs, including significant delivery at Great Chesterton and north of Stansted (provision of 80ha of employment space between the two sites). The permitted expansion of London Stansted Airport recognises the significant potential to attract additional investment into the district. This reflects the Economic Development and Prosperity Strategy (2017), capitalising on existing economic sectors in addition to new.
- 3.44 To this end, additional housebuilding and related infrastructure development proposed through the Local Plan is expected to lead to **significant long term positive effects** on the economy; supporting the local employment base and creating jobs in new and growing sectors

Cumulative effects

- 3.45 Cumulative effects occur from the combined impacts of policies and proposals on specific areas or sensitive receptors.
- 3.46 In the context of SA/SEA, cumulative effects can arise as a result of the in-combination and synergistic effects of a plan's policies and proposals. Comprising 'intra-plan' effects, these interactions have been summarised above, and discussed in detail within Chapter 10 of this Report which evaluate the in-combination and synergistic¹³ effects of the various policies of the Local Plan.
- 3.47 Cumulative effects can also result from the combined impacts of a plan with impacts of another plan, or the 'inter-plan' effects. These can affect the same receptor, resulting in in-combination or synergistic effects. The Uttlesford Local Plan therefore has the potential to combine with other planned or on-going activities in the sub-region and region to result in cumulative effects.
- 3.48 Key examples of cumulative effects of new development proposed through emerging or adopted plans, and activities in the wider area include:
- Potential cumulative (or in combination) effects on Epping Forest SAC/ SSSI and Hatfield Forest SSSI as a result of increased recreation and reduced air quality. There is a signed MoU committing parties to managing the impacts of growth within the HMA on Epping Forest SAC/ SSSI and there are ongoing discussions to ensure that there are mechanisms in place to address issues in relation to Hatfield Forest SSSI.
 - The Local Plan has the potential to interact with development proposed through other plans to have a cumulative effect on the landscape. This is most likely to arise through the incremental loss of greenfield sites on the edge of existing settlements as well as the delivery of large-scale development such as new settlements. Ultimately the nature and significance of effects will be dependent on the design/ layout or development and the implementation of mitigation measures.

¹³ Synergistic effects arise between two or more factors to produces an effect greater than the sum of their individual effects.

- Cumulative effects are likely to arise through the incremental loss of agricultural land on the edge of existing settlements as well as the delivery of large-scale development such as new settlements.
- There is the potential for a significant cumulative loss of greenfield land as a result of the distribution of housing to meet the Objectively Assessed Need (OAN) across the West Essex/ East Hertfordshire Housing Market Area (HMA) and this may cumulatively affect the wider historic environment setting.
- Development proposed in the Local Plan has the potential to interact with development proposed through other plans within and outside the HMA. The Council has worked closely with other HMA and wide Local Authorities and the ECC to mitigate for the potential impacts of increased growth on local and strategic highways infrastructure and resulting increase in greenhouse gas emissions. A signed Memorandum of Understanding (MoU) (2017) has been produced, which identifies a number of new infrastructure interventions that will be necessary.
- Uttlesford is part of three different Catchment Flood Management Plan (CFMP) areas: the Great Ouse CFMP, the Thames CFMP and the North Essex CFMP. These Catchment Management Plans will address cumulative effects of development within the CFMP areas; recommending ways of managing the risk now and over the next 50 to 100 years.
- The interaction between new development proposed through Local Plans within the LSCC has the potential to lead to cumulative effects. These effects are likely to be significant and positive in terms of improving access to employment; meeting the needs of local people and supporting sustainable economic growth throughout the corridor.
- Cumulative effects resulting from the delivery of the economic preferred growth scenario across the FEMA (the combined area of East Hertfordshire, Epping Forest, Harlow and Uttlesford Districts) are anticipated to be significant, positive and long-term. Positive effects include balancing job growth with growth in homes; seeking to secure good access to social, leisure, community, health facilities and education.
- Significant, positive and long-term cumulative effects are anticipated in relation to proposals for London Stansted Airport. The wider strategic allocation serves the strategic role of Stansted Airport and associated growth of business, industry and education; supporting Uttlesford, the sub-regional and national economy.
- Cumulative effects are anticipated through the delivery of the East of England Biodiversity Delivery Plan (2008). LPAs within Essex are encouraged to take a strategic approach to establish large areas of quality countryside throughout Essex which are good for wildlife and people, recognise the importance of history and culture, and which integrate social and economic benefits.
- The provision of natural and semi-natural green space through Local Plan proposals and projects within the area will therefore deliver benefits at a regional, sub-regional and local level. For example, the delivery of West of Braintree Garden Community will include a comprehensive masterplan process including significant green infrastructure delivery, which will align with proposals within Braintree Local Plan.
- Cumulative effects are anticipated in relation to improvements to accessibility; resulting from the in-combination effects of enhancements to public transport and cross-boundary walking and cycling networks.

- Access to community services and facilities, i.e. health care provision, may improve through the combined delivery of Local Plans in the area. For example, the delivery of Garden Communities should include new health centres.
- The delivery of the combined level of housing need across the HMA will lead to significant positive cumulative effects in terms of meeting the sub-regional housing demands.

4. Next steps

Introduction

4.1 The aim of this chapter is to explain next steps in the plan-making/ SA process.

Plan finalisation

4.2 The Council is preparing to submit the Local Plan to the Secretary of State for examination in public, in-line with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Submission SA Report and this NTS are being published on the Council's website to allow representations to be submitted. The submission of the Local Plan will occur during this representation period, any comments received on the SA Report and this NTS will be submitted following the end of the consultation period.

4.3 At Examination a government appointed Planning Inspector will consider representations (in addition to the SA Report and other submitted evidence) before determining whether the plan is sound (or requires further modifications).

4.4 If found to be 'sound' the plan will be formally adopted by the Council. At the time of adoption an 'SA Statement' will be published that sets out (amongst other things) 'the measures decided concerning monitoring'.

Monitoring

4.5 At the current time, there is a need only to present 'measures envisaged concerning monitoring'. The Pre-submission Local Plan includes a range of proposed monitoring measures in Appendix 2. The table below lists a selection of the Council's proposed measures, as well as any wider monitoring measures, that are of particular importance given the findings of the appraisal.

Table 4.1: A selection of the Council's potential monitoring measures

SA objective	Proposed measure (given appraisal findings)
1: To conserve and enhance biodiversity (habitats, species and ecosystems) within the district	<ul style="list-style-type: none"> Condition of Sites of Special Scientific Interest (SSSI). Number of Local Wildlife Sites (LWS) under Positive Conservation Management.
2: To conserve and enhance water quality and resources and help achieve the objectives of the Water Framework Directive	<ul style="list-style-type: none"> Number of planning applications granted contrary to Environment Agency advice.
3: To conserve and enhance the district's landscape character and townscapes	<ul style="list-style-type: none"> Number of new dwellings permitted within Green Belt. Number of new free-standing dwelling permitted within the Countryside Protection Zone. Number of new dwellings permitted beyond development limits that do not meet policy criteria.
4: To conserve and enhance soil and contribute to the sustainable use of land	<ul style="list-style-type: none"> Number of new dwellings on brownfield sites.
5: To maintain and	<ul style="list-style-type: none"> Number of Buildings on the Heritage Risk Register.

SA objective	Proposed measure (given appraisal findings)
enhance the district's cultural heritage assets and their settings	
6: To reduce contributions to climatic change	<ul style="list-style-type: none"> • Number of planning applications granted contrary to Environment Agency advice. • Floorspace and percentage of commercial development built to at least BREEAM very good rating.
7: Reduce and control pollution	<ul style="list-style-type: none"> • Local Air Quality Updating and Screening Assessment report and Air Quality Progress Reports. • Number of dwellings built within poor air quality zones. • Quarterly Moving Annual Total produced by CAA.
8: To reduce the risk of flooding	<ul style="list-style-type: none"> • Number of planning applications granted contrary to Environment Agency advice.
9: To promote and encourage the use of sustainable methods of travel	<ul style="list-style-type: none"> • Amount and % of new residential development within market towns and key villages and garden communities. • Quarterly Moving Annual Total produced by CAA.
10: To ensure accessibility to services	<ul style="list-style-type: none"> • Amount and % of new residential development within market towns and key villages and garden communities. • Delivery of major infrastructure priorities identified to facilitate development against IDP timescale. • Net additional floorspace completed. • Number of A1 uses on Primary Street Frontages.
11: To improve the population's health and promote social inclusion	<ul style="list-style-type: none"> • Area of allotments provided and transferred to managing body. • Number of sports pitches provided and transferred to a managing body. • Amount of green space provided and transferred to a managing body. • Delivery of major infrastructure priorities identified to facilitate development against IDP timescale. • Number of changes of use of village shops and other community assets permitted.
12: To provide appropriate housing and accommodation to meet existing and future needs	<ul style="list-style-type: none"> • Housing Trajectory for 5 and 15-year period. • Net additional affordable dwellings completed per year. • Dwelling sizes (number of bedrooms) of completed developments of 6+ dwellings between 2011 – 2033 measured annually. • Completion of housing for people with specific accommodation needs.
13: To promote the efficient use of resources, including land and ensure the necessary infrastructure to support sustainable development	<ul style="list-style-type: none"> • Delivery of major infrastructure priorities identified to facilitate development against IDP timescale. • Net additional floorspace completed. • Number of A1 uses on Primary Street Frontages.
14: To improve the education and skills of the population	<ul style="list-style-type: none"> • Delivery of major infrastructure priorities identified to facilitate development against IDP timescale.
15: To ensure sustainable employment provision and economic growth	<ul style="list-style-type: none"> • Net additional employment floorspace completed. • Net additional jobs provided as reported in the Airport Employment Survey. • Number of changes of use of village shops and other community assets permitted.

Committee: Planning Policy Working Group

Date:

Title: Local Plan – Representations update

10 January 2019

Report Author: Stephen Miles, Planning Policy Team Leader,
346

Item for decision:
No

Summary

1. A summary of representations from the Regulation 19 representation period and the Addendum of Focussed Changes is provided for PPWG.

Recommendations

2. That Planning Policy Working Group considers the summary of representations.

Financial Implications

3. Not applicable.

Background Papers

4. None

Impact

- 5.

Communication/Consultation	The Local Plan was published for a representation period in the summer of 2018, and the Addendum of Focussed Changes was published for a representation period in the Autumn of 2018.
Community Safety	This is an underlying theme of the Local Plan
Equalities	The Regulation 19 Local Plan was subject to an equalities impact assessment, which confirms that there are no inequalities identified that cannot be easily addressed or legally justified. Officers reviewed the Equalities Impact Assessment for the Regulation 19 Local Plan and considered it did not need to be updated as a result of the proposed changes in the addendum.

Health and Safety	Health and wellbeing of the Uttlesford community is an important theme of the Local Plan and is considered as part of the sustainability appraisal/ strategic environmental assessment of the Local Plan.
Human Rights/Legal Implications	The Local Plan needs to comply with human rights and planning legislation. The regulatory framework is provided by the Planning and Compulsory Purchase Act 2004 (as amended) and related statutory instruments. 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 Local Plan is subject to sustainability appraisal/ strategic environmental assessment throughout its preparation.
Ward-specific impacts	All
Workforce/Workplace	The Local Plan is a key corporate document and officers from across the council's services have contributed to its preparation.

Situation

6. Officers have summarised the representations from the Regulation 19 representation period in the summer and the Addendum of Focussed Changes representation period in the autumn. These can be found at Appendix 1 to this report.
7. These representations will be submitted to the Secretary of State alongside the Local Plan later in the month.

Risk Analysis

8.

Risk	Likelihood	Impact	Mitigating actions
The Council fails to submit the Local Plan to the Secretary of State	1 – The Council is on track to submit the Local Plan	4 – Failure to submit the Local Plan under the	Officers are working to ensure the Local Plan can be submitted under the transitional

under the NPPF transitional arrangements	on or before 24 January 2019	transitional arrangements means that the housing and policy requirements would need to be in line with the NPPF 2018	arrangements.
The plan submitted for examination is not legally complaint or is found unsound	<p>2 – Officers have sought to discharge the duty to cooperate by regular meetings and the production of Memorandums of Understanding (MoUs) and/or Statements of Common Ground.</p> <p>Officers have developed an evidence based plan that seeks to meet the full growth requirements of the District</p>	4. If duty to cooperate is not demonstrated, that failure could not be mitigated by modifications.	<p>The Council has engaged with statutory bodies and either entered into or is seeking to enter into a MoU or Statement of Common Ground.</p> <p>Officers have engaged regularly with PINS and keep up to date with local plan examinations.</p> <p>The Council retains the services of legal and other professional specialists.</p>
The Inspector carrying out the Examination of the Plan recommends modifications to make the Local Plan a “sound” Plan	4 – Generally, modifications will be recommended	2 – Will result in a sound Local Plan which will form a robust basis for guiding development and investment and determining planning	

		applications.	
--	--	---------------	--

- 1 = Little or no risk or impact
- 2 = Some risk or impact – action may be necessary.
- 3 = Significant risk or impact – action required
- 4 = Near certainty of risk occurring, catastrophic effect or failure of project.

Uttlesford District Council Regulation 19 Pre-submission Local Plan; Summary of Responses	
Section / Paragraph / Policy	Summary of Responses
UTTLESFORD DISTRICT COUNCIL REGULATION 19 PRE-SUBMISSION LOCAL PLAN	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
FOREWORD	
SUPPORT	4
OBJECT	17
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • The strategic policies in the plan reflect the discussions and agreements reached in the Cooperation for the Sustainable Development Member Board. The plan is based on effective joint working on cross boundary strategic priorities (Epping Forest District Council, PSLP51) • Support for the plan.
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Lack of jobs to support growth, and poor access to inadequate public transport means people will commute long distances to work by car. • Plan for Rapid Transit System is vague. • Infrastructure can't support development. • Destruction of rich farmland, ancient woodland and natural areas. • Building under Stansted flight paths is inappropriate. • The plan is not financially viable. • The plan does not consider sport facilities. • Section 106 is not reliable to deliver planning gain, a CIL is preferable. • Decisions on RIS2 will not be made until 2019, WoB cannot be known to be deliverable. • M11 J8 (and transport infrastructure generally) cannot cope with development. • The North Essex Authorities Inspector's letter, particularly around the Conclusions on the Cross Boundary Garden Communities, needs to be taken into account. • The importance of green spaces in tackling air quality is not taken into account. • Growth data is out of date. • Traffic impacts on Saffron Walden are unacceptable. • Schools cannot cope with development.

MODIFICATION REQUEST	
1. Introduction	
SUPPORT	3
OBJECT	7
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • The plan meets legal compliance requirements as set out in Section 39 of the Planning and Compulsory Purchase Act; • The Plan provides a strategy that seeks to meet the area's objectively assessed needs; • It is also informed by agreements with other authorities, in particular Braintree where the two authorities respective needs; • The Plan is based on an appropriate strategy, has considered reasonable alternatives, and is based on proportionate evidence; • It is an effective Plan that is deliverable over the plan period, and as stated, includes joint working on cross-boundary strategic matters. • The Plan will enable the delivery of sustainable development; • The Council has provided details of co-operative working with Braintree Council in connection with the W of Braintree Garden Community; this includes minutes of meetings, the DPD project group, from 2015 onwards; and • The Council has considered a range of growth options as set out in the Identification of Reasonable Alternatives Paper April 2017. (<i>Galliard Homes, PSLP 775</i>) • ECC considers UDC has met its obligations under Section 110 of the Localism Act regarding the duty to cooperate with regard to those statutory responsibilities of ECC, namely highways and transportation, education, minerals, waste, surface water management, Public Health, and Adult Social Care. <ul style="list-style-type: none"> ○ UDC has engaged ECC at each stage of local plan preparation from the Issues and Options in 2015 through to the Regulation 19 consultation. This has included: <ul style="list-style-type: none"> • a range of UDC and ECC officer meetings to systematically address the Regulation 18 representations made by ECC; • the contribution to the evidence base to support plan preparation and where appropriate supported by MOUs; • officer and member meetings of the Cooperation for Sustainable Development Board; • officer and member meetings to discuss and progress Uttlesford Garden Communities, including ECC Members and Officers playing a full part in Uttlesford's Garden Communities Delivery Board; and • officer and member North Essex Garden Communities (NEGC) meetings as they relate to the West of Braintree Garden Community (WBGC) to ensure a consistent approach to support delivery. • Discussions have also taken place regarding:

	<ul style="list-style-type: none"> • joint working with Essex Planning Officers' Association (EPOA) on joint evidence base and protocols, namely Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS); Essex Wide Gypsy and Traveller Accommodation Assessment (2018); and Unmet Housing Needs Protocol (2017) ○ ECC has been consulted on its service area infrastructure requirements, which have been satisfactorily incorporated into specific policies and supporting text and/or the IDP (unless otherwise indicated in this response where an amendment is required to ensure soundness). (Matthew Jericho, Essex County Council, PSLP 868)
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • The plan lacks an evidence base including a proper Comparative Sustainability Assessment which was embedded into the Plan process as required by the NPPF. (Newport Parish Council , PLSP 2998) • Sustainability issues have to be dealt with before implementation of the plan rather than being subject to post hoc mitigation. (Sustainable Uttlesford PSLP 2040) • Community Involvement process has been ineffective and not in accordance with the Statement of Community Involvement; • Failure to give proper, meaningful consideration to informed responses e.g. reapportionment of GLA forecasts, informed input from both Stansted Airport and Stop Stansted Expansion has not led to change in UDC employment forecasts between Reg 18 and Reg 19; • Strategy based on overstated housing requirements; • Unsound justification for both jobs and houses; • Forecasts upon which the Plan is based are not evidenced and alternative forecasts have not been prepared or tested; • The Local Plan is not consistent with national policy i.e. the SHMA failed to comply with the 2012 National Planning Policy Framework ("NPPF") which included at para 159 and failure to take account of latest Government aviation policy which favours expansion at Heathrow. (PSLP 638) <ul style="list-style-type: none"> • Local Plan should be scrutinised against the 2018 NPPF; (PSLP755) • Ineffective public engagement since it has been one-way (PSLP699) • This consultation may be correct and legal. This consultation is just so complicated and difficult to comment on it is effectively useless. How are local people to have their say when all of this is just such hard work! Not a level playing field for objectors! (PSLP 719) <p>This consultation is very defective, in several ways. In order to comment, the user accesses three internet pages, as follows:</p> <ol style="list-style-type: none"> a) 'The Regulation 19 Pre-submission Local Plan and how to comment' at https://www.uttlesford.gov.uk/article/4684/The-Regulation-19-Pre-submission-Local-Plan-and-how-to-comment#rep-from , hereafter 'Page (a)'. This page includes 'Documents which make up the Local Plan' at the bottom and 'Guidance Notes' which are accessed about two-thirds of the way down the page. b) 'Uttlesford Uttlesford District Council Regulation 19 Pre-submission Local Plan' at https://uttlesford-consult.objective.co.uk/portal/planning_policy/local_plan_2018/udc_reg_19 , hereafter 'Page (b)'. This page includes a tab at the bottom, 'Supporting Documents', which includes 'Guidance Notes'. c) 'Consultation Portal' at https://uttlesford-

	<p>consult.objective.co.uk/portal/planning_policy/local_plan_2018/udc_reg_19?pointId=4918009 , hereafter 'Page (c)'.</p> <p>Issues</p> <ol style="list-style-type: none"> 1. The criteria which determine whether a document is included on Page (a) or Page (b) are unclear. 2. Although the 'Guidance Notes' are available from both Page (a) and (Page b), the access is not prominent on either page. 3. Apparently it is not possible to e-mail comments direct, as with previous consultations. If a respondent does not want to use the portal, a separate Representation Form must be used for each Policy. This will be a deterrent to some respondents. 4. Page (b) says at the top that the Plan 'has been prepared with reference to the National Planning Policy Framework, the Uttlesford Community Strategy . . .' These two documents are not easy to find, as follows: <ol style="list-style-type: none"> 4.1 The NPPF does not seem to be included within the 'Documents which make up the Local Plan' at the bottom of page (a), although it is included under a separate heading about two-thirds of the way down. It is not included in the 'Supporting Documents' at the bottom of page (b). 4.2 The Uttlesford Community Strategy does not seem to be included within the 'Documents which make up the Local Plan' at the bottom of page (a). It is not included in the 'Supporting Documents' at the bottom of page (b). The general search feature is as helpful as usual (not at all). I have not found this document, despite my best endeavours. 4.3 The citing of these two documents at the top of Page (b) should include references as to where they can be found. 5. When the respondent clicks the Add Comments box on Page (c), several questions and boxes unexpectedly appear. The 'Guidance Notes' include: <p>Part B – Your Representation</p> <p>Question 3</p> <p>Please specify which part of the Pre-Submission Local Plan your comments relate to by choosing one of the following:</p> <ul style="list-style-type: none"> – Paragraph: for a representation on wording or content of a paragraph in the Pre-Submission Local Plan – Policy: for a representation on the wording or inclusion or omission of a policy in the Pre-Submission Local Plan. – Policies Map: for example a map, site reference or the wording or content of plans, tables or appendices. <p>But Question 3 does not appear when Add Comments is accessed. The questions presented to the user relate to the Plan as a whole, rather than the particular Policy.</p> <ol style="list-style-type: none"> 6. The Guidance Notes refer to Question 4(1), 4(2) and 4(3). They are actually presented as Q1, Q2 and Q3 when adding a comment. Question 5 on the Guidance Notes, Sustainability Appraisal, is actually Q4 when adding a comment. 7. The Guidance Notes give guidance on all the questions. But Page (a) and Page (b) give guidance only on Question 2, 'soundness'. 8. The questions all relate to the Local Plan. They do not refer to the
--	--

	<p>particular Policy which the respondent wishes to comment upon. It is redundant and confusing for Questions 1 to 4 to appear for every response. It is unlikely that the respondent will want to give a different answer to Questions 1, 3 and 4 depending upon the Policy.</p> <p>9. The respondent needs to intuit that comments on the Policy in question are probably best made under Q2 on soundness and that the other questions can probably be ignored. The questions are presented, however, as if an answer is obligatory. It is only when faced with the demand to know, for example, why the Local Plan is considered legally compliant that the respondent realises that some of the questions are best ignored.</p> <p>10. The ancillary questions are another surprise. Having answered 'Yes' or 'No', the respondent is then unexpectedly asked to justify the answer. If the answer to Q2 is No, further questions appear as to why the Plan is unsound, and whether modifications are sought. If the answer to the latter question is 'Yes' a further box appears. By this time the respondent is starting to feel harassed.</p> <p>11. Q1 on legal compliance is not a matter on which many members of the public will feel qualified to comment, beyond the obvious point that UDC must be particularly incompetent if their Plan is not legally compliant. Time constraints would not permit familiarity with the several documents cited in the Guidance Notes.</p> <p>12. Q2 is on soundness. Decisions are needed as to how best to answer Q2a) to Q2d) and Q2). These questions are not easy to interpret, even with the help of the Guidance Notes. It seems possible that some respondents will answer 'No' to all four without consideration.</p> <p>13. Q3 is on the duty to co-operate. There is a particular meaning to this question, not necessarily known to all members of the public. The question should be on the lines of, 'Do you consider the Local Plan complies with the Duty to Co-operate with adjacent local authorities?'</p> <p>14. Q4 is a big surprise. There has been no mention of the Sustainability Appraisal previously. It is not easy to find. The Guidance Notes don't help, and they don't say where it is either. The SA comprises 590 pages, in addition to Annexes A, B and C totalling 232 pages, and a Non-Technical Summary of 57 pages. The respondent is unlikely to have sufficient time to become familiar with all this material. The Supporting Documents within Page (b) include the UDC Reg 19 Local Plan Sustainability Appraisal Environmental Report, and the Non-Technical Summary, but not Annexes A, B and C.</p> <p>15. Unlike the Section 18 consultation, there is no possibility of responding to individual paragraphs but only to policies. Thus if I wish to point out that the statement in 2.5 to the effect that Saffron Walden and Great Dunmow provide 'nearly all the District's food shopping needs' is incorrect, there is nowhere to make the comment.</p> <p>16. Formatting is largely lost when a comment is added to the system. Tables, indents, bold and italics are all, I believe, lost. The only way to add emphasis is to PUT IT IN CAPS. It would be useful if this limitation was noted, rather than respondents having to find out the hard way.</p> <p>17. Once a comment has been submitted, there is then a useful facility which enables a PDF of the comment to be produced. To the user's consternation, however, the paragraphs are lost in this document, and the representation appears as continuous text. Planning Policy have</p>
--	--

	<p>assured me that the paragraphs will appear on submissions as held on the website.</p> <p>18. The Additional Information at the bottom of Page (a) includes ‘Supplementary Paper on Appendix 3’, but there is nothing to direct attention to it. The document actually includes much fuller data than is available in Appendix 3. Completions and existing commitments are only shown as at April 2017, but the document should undoubtedly be more obviously available. The meaning of the last column, PDL/G is not apparent to me.</p> <p>19. Documents referenced in the Plan should be easily accessible, probably by ensuring that they are all included in the Supporting Documents in Page (b). The NPPF should be there and so too should the SHMA, which is not easy to locate.</p> <p>20. All in all, the way the system is set up bears evident signs of haste, and the result is that it seems designed to deter participation, rather than encourage it. It seems likely that it will attract fewer responses than the Regulation 18 consultation, and possibly UDC will wish to say that that is a sign that issues raised in that response have been answered satisfactorily. But any such supposition would be far from correct.</p> <ul style="list-style-type: none"> • Not everyone understands what the Duty to Co-operate is. The question should be, 'Do you consider the Local Plan complies with the Duty to Co-operate with adjacent local authorities?' (PSLP 642)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Replacement of current housing forecast with an evidence based and transparent calculation after removing duplications and errors; • Recalculation of UDC’s forecasts by either discounting 2001 “airport-related” housebuilding or use of a typical base period; • The level of future employment at Stansted Airport and its projected impact on future housing need should be forecast independently, explicitly and transparently; • The overall forecast of jobs growth should be recalculated because it was drawn up specifically to fill the gap between residents and jobs and was not an even-handed projection and failed to consider downsides; (PSLP638) • Plan needs to be assessed against NPPF 2018 (PSLP719) • Take note of all the comments above, and act accordingly. Actions should include: <ul style="list-style-type: none"> ○ Ensure all relevant documents are easy to find. ○ Accept submissions by e-mail. ○ Re-construct the portal, so that general questions are asked once only, and responses to policies are made individually. ○ If questions must be asked on, for instance, the Sustainability Appraisal, make that clear before a response is attempted. ○ Accept responses to individual sections. ○ Ensure the Guidance Notes are correctly referenced. ○ Advise respondents that formatting will mostly be lost. ○ Sort out the paragraphs in the PDF copy. ○ Make the Supplementary Paper on Appendix 3 easily available. ○ Review the whole system with the eye of someone who has never seen it before. Take some time and get it right. ○ Finally, proof read the entire document, preferably by someone

	who understand the difference between ‘dependent’ and ‘dependant’, between ‘may be’ and ‘maybe’, and between ‘complimentary’ and ‘complementary’.(PSLP 642)
2. Spatial Portrait Visions and Objectives	
SUPPORT	12
OBJECT	75
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Plan aims and aspirations of spatial portrait broadly supported; (Landhold Capital Ltd PSLP2992) • The Neighbourhood Plan supports all the objectives of the Local Plan (Saffron Walden and Little Walden Neighbourhood Plan PSLP2938). • Settlement hierarchy and supporting text is supported;(Richard Coke PSLP1821) • Parts of the Spatial Vision as set out at page 12 of the Local Plan are broadly supported especially those reflecting need to support a balanced local economy, better alternatives to the private car, and better access to housing - all whilst protecting the district’s special characteristics.(Martin Grant Homes & Bloor Homes PSLP2880) • Paragraph 6 is strongly supported as London Stansted Airport will form a pivotal part of a highly successful London Stansted Cambridge Corridor. The airport will strengthen the local economy by providing opportunities for employment growth; • Objective 2a is supported as it looks to enable growth of existing and new employment through provision of suitable land in sustainable locations; and • Request to allocate land north of Taylor’s Farm, Takeley Street for light industrial and strategic warehousing and distribution uses. (Pigeon Investment Management Ltd PSLP 2736) • The Plan provides a strategy that seeks to meet the area's objectively assessed needs, including supporting the growth of Stansted Airport. This is to be achieved in a manner that is consistent with achieving sustainable development. The spatial strategy is appropriate and has been agreed following a thorough consideration of reasonable alternatives as set out in the Sustainability Strategy. The West of Braintree Garden Community is an example of the product of effective joint working on cross-border strategic matters. The selected spatial strategy including Garden Communities will enable the delivery of sustainable development.(Galliard Homes PSLP 776) • The Local Plan has been prepared in a robust and positive fashion to ensure that sufficient and suitable land is identified to deliver new homes and employment in a sustainable manner including through creation of Garden Communities; • The new Local Plan is justified with a robust and thorough evidence base including an Infrastructure Delivery Plan, Viability Assessment, Sustainability Assessment including a thorough consideration of alternative Garden Community permutations, and a full range of technical evidence base reports; • The Spatial Vision set out within the Local Plan will be effective due to the vision striking the correct balance between being bold and ambitious to ensure that growth will be delivered, whilst also ensuring that development is brought forward in a sustainable manner alongside appropriate and necessary infrastructure. The Spatial Vision is effective as

	<p>it is underpinned by a set of sound spatial objectives;</p> <ul style="list-style-type: none"> • A key component of the Spatial Vision is the delivery of sustainable new settlements based on Garden Community principles as advocated by the Town & Country Planning; (Association, including the WBGC.(Andrewsfield New Settlement Consortium PSLP 1999) • Support is offered for including a strategic objective (1d) which seeks to protect and enhance local services by ensuring that new infrastructure including sports facilities are provided to meet the needs of people and business. This recognises the role that sports facilities play in meeting this objective; and • Support is also offered for including a strategic objective (1e) that seeks to achieve high quality design that provides a healthy place for residents, visitors and businesses. This recognises the role that design can play in achieving healthy and active environments.(Sport England PSLP 2) • Henham Parish Council supports the Spatial vision, in particular: <ul style="list-style-type: none"> ○ The focus for new development on the towns and larger villages plus the new Garden Communities; ○ The protection of the countryside; ○ The provision of necessary infrastructure etc. to support growth. (Henham Parish Council PSLP 2150) • Objective 1a is supported but the new housing requirement has been under estimated. (Landhold Capital 1283) • Spatial strategy outlined in policy S2 of the draft local plan to be sound. I therefore support it.(PSLP 7)
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • Underestimation of new housing requirement; • Plan as worded fails to represent most appropriate strategy; (Landhold Capital Ltd PSLP2992) • Inconsistency between house price and average earnings data in Plan and UDC Housing Strategy thus hugely over-estimating housing affordability; (Saffron Walden and Little Walden Neighbourhood Plan PSLP2938). • Limitation of new homes to a total of 134 in plan period is not justified as it fails to provide opportunities for sustainable development; and • Plan fails to represent most appropriate strategy; (Richard Coke PSLP1821) • Local Plan strategy is not effective as it fails to balance competing objectives; and • Housing delivery focussed on Garden Communities and low apportionment of growth to other sustainable settlements; (Martin Grant Homes & Bloor Homes PSLP2880) • Although the Plan is legally compliant the Sustainability Appraisal report is flawed and unsound; • The plan is over-dependent on the garden communities and has an over-ambitious expectation as to the timing of delivery and rates of production e.g. The North Essex Authorities (NEAs) have yet to agree collectively what action to take and there could be uncertainty for a period of 3 to 4 years as to whether the West of Braintree GC is deliverable, as the UDC proposed extension of this GC is wholly dependent upon the larger Braintree proposals; and • The current Reg 19 Plan is unsound and the chosen spatial strategy cannot possibly be demonstrated to be the most appropriate one when

	<p>considered against reasonable alternatives. (Bloor Homes Eastern PSLP 896).</p> <ul style="list-style-type: none"> • It is not clear that the Local Plan meets the objectively assessed development and infrastructure needs of the area, including unmet needs of neighbouring areas where this is consistent with policies in the National Planning Policy Framework as a whole; • Insufficient account taken of the interests of South Cambridgeshire District Council. (Abington Park Farm PSLP 836) • The Uttlesford Local Plan needs to address potential impacts, through air quality and recreational pressure, to Epping Forest Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC) and Hatfield Forest SSSI. (Natural England PSLP 2447) • The plan should seek to achieve enhancement in line with your aspiration for the historic environment (Natural England PSLP 2450) • The vision itself (last sentence of point 6) does not consider 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; • Objective 2c, first bullet: It is not clear what the ‘permitted capacity’ means precisely. For example, the permitted capacity at the time of the draft plan or the permitted capacity approved at any relevant point in time over the plan period. In the context of the airport’s current planning application and also the draft policies that support growth (i.e. SP11), it would suggest the latter. Nevertheless, the objective is not effective as the wording is imprecise; • Objective 2c second bullet: This is supported by Stansted Airport Limited (‘STAL’) in principle but the theme would be more effective if there was an explicit aim and commitment to partnership working (with transport agencies and other authorities) to deliver transport infrastructure; • Essex County Council (ECC) is supportive of Objective 3b, but there is no mention of the opportunities to mitigate and adapt to climate change through green infrastructure as promoted through paragraph 99 of the NPPF (2012). (Essex County Council PSLP 872) • ECC considers that there is a need to reinforce reference to sustainable travel within the spatial vision; and • Specific mention should be made to sustainable travel and links with the new Garden Communities as significant modal shift is required to meet transportation requirements outlined in Policies SP 5, SP 6, SP 7 and SP 8. (Essex County Council PSLP 872) • The plan refers to the ‘London Stansted Cambridge Corridor’ which is not an official geographical area but a term used instead by a consortium supporting development to suit their own interests. Uttlesford District Council should be above, and be seen to be above, commercial interests of this sort and not succumb to political lobbying from such a group; and • The plan is based upon spurious figures for housing growth for which no proper justification is given – the projections are overinflated and some of the highest for any local authority in the country. The sizes of the new settlements that the Local Plan proposes are overly large and the degree of expansion of existing towns and villages is also extreme, especially when considered alongside construction work that has already, or
--	--

	<p>recently, taken place. (PSLP 2050)</p> <ul style="list-style-type: none"> • The Sustainability Appraisal for the Uttlesford Draft Local Plan has been produced by the same author for the North Essex Authorities, and is underpinned by the work undertaken in respect of the Joint Strategic Plan, it follows that it is highly unlikely that the West of Braintree Garden Community element of the Draft Plan is legally compliant (Stebbing Parish Council PSLP 2236) • Objective 1a is supported but the housing requirement has been underestimated and will result in a Plan that does not boost housing as per Government aims; • The Plan as currently worded fails to represent the most appropriate strategy and is not justified or effective as required by the tests of soundness set out within paragraph 182 of the NPPF (2012) (Stonebond Properties PSLP 2708) • Plan fails to address major planning challenges and long-term development hurdles; • Details crucial to the Plan’s viability have been deferred to DPDs; • Major contributory factors that might have a bearing on numbers and siting have been ignored; • There is no short term or medium term indication on the stress on existing services in adjacent villages and towns; • Proposed three new Communities is unrealistically ambitious; • There is little or no actual plan where necessary or essential infrastructure has been identified; • The plan does not have a strategy to meet other objectively assessed development needs; • A clear and measurable direction has not been presented for transport, air quality and open space provision; and • Issues not addressed in a rigorous and objective process due to lack of appropriate evidence at all levels.(PSLP 2591) • The plan is unfit for purpose (PSLP 1796) • The proposed local plan, particularly the large towns proposed, will not be deliverable over the plan period and the plan has totally disregarded developments in neighbouring South Cambs. (PSLP 2020) • The plan as proposed is not the most appropriate strategy when taken in the context of other options and fundamentally lacking in an objective evidence base; • The housing target is unnecessarily high as the Stansted which was the driver of the growth reached saturation point some time ago; • Unjustifiable site selection as the North Uttlesford new town will be developed on hillside which is at odds with all surrounding development. (PSLP2019) • Central Saffron Walden is still an AQMA and pollution levels are still above the legal limit we are extremely disappointed that no AQA or traffic assessment for Saffron Walden has been prepared in relation to the Regulation 19 draft. It is therefore impossible for UDC to come to a conclusion as to whether or not development in Saffron Walden is sustainable in the absence of this evidence base.(Saffron Walden Town Council PSLP 2319) • House price and average earnings data in the Plan is inconsistent with data in the UDC Housing Strategy (which is a background document and
--	--

	<p>evidence base for the Plan). The affordability of housing is hugely over-estimated by the Plan. Development based on affordability levels that don't exist is unsustainable (Saffron Walden Town Council PSLP 2317)</p> <ul style="list-style-type: none"> • It is not justified on the basis of the background to the Plan. It is not likely to be effective; in particular, there are serious questions about whether the strategy is deliverable. Finally, we consider that it is not consistent with national policy in that it will not bring about sustainable development. In particular, the strategy of the emerging Local Plan is not necessarily sustainable, in terms of the amount of land required for the garden communities, which are likely to be developed at relatively low density, and the extent to which these new communities might have to rely even in the longer term on jobs, facilities and services in existing settlements or at the District's main employer of Stansted Airport. (PSLP 2279) • A new town at Easton Park as set out in SP6 is not consistent with NPPF in terms of sustainability due to loss of productive agricultural land, cause traffic congestion on A120, B1256 and M11; lack of infrastructure; additional housing at Easton Park will harm Great Dunmow's identity; new residents will be commuting to London, insufficient job opportunities at Stansted Airport to service three new settlements; not sound to build housing next to an airport; and • It has totally ignored previous decisions of its own (Uttlesford District Council) planning team, the local town Council at Great Dunmow and the surrounding parish councils. (PSLP 2558) • The sustainability assessment is unsound for the same reasons as the inspector Roger Clews found with BDC's plan. At the core is that the UDC spatial vision is sparing in its clarity and context. (PSLP 824) • The majority of the population in Uttlesford lives in villages and there is no need to build a town to house 20,000 – 30,000 people. People will use cars to go to work; • The need for a new town at Easton Park is unsubstantiated. No jobs, no station, wrong type of housing recommendation for the predicted future population, encourages car use as there is no affordable parking at the nearest station at Stansted Airport, poor proximity (approximately 10 miles straight line distance) to the two nearest A&E departments will place unnecessary increased pressure on The East of England Ambulance service. (PSLP 757) • 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; • 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; • In addition to the obvious transport and other infrastructure (esp water and sewerage) flaws the proposed WBGC would result in the loss of some of the best and most versatile Grade 2 agricultural land in the region; and • There will be a thoroughly negative impact on existing wildlife through
--	---

	<p>increased pollution (noise, air and light) and the loss of sensitive ecosystems that support protected woodlands, flora and fauna. Specifically, there would be a seriously detrimental effect on Boxted Wood (which is an ancient woodland) directly contravening the latest Government White paper on the topic. (PSLP 722)</p> <ul style="list-style-type: none"> • The plan is not demonstrably the most sustainable option. The housing numbers are inconsistent and based on questionable criteria. The level of transport planning is insufficient to assess whether the transport network will be capable of supporting the additional traffic load implied by the spatial strategy. Sustainable transport links are suggested but not properly defined and costed. Junction improvements in neighbouring districts are outlined but not scheduled or costed. There is no cumulative assessment of the air quality impact of additional traffic within the district or neighbouring districts. The infrastructure plan is not sufficiently costed or scheduled to determine the financial viability of the plan. The proposed delivery methodology for the new settlements is unproven. The capture of land value for the public good has not been secured (PSLP 693) • Para 2.10 seems to justify the Plan against the "London Stansted Cambridge Corridor economic growth area". The LSCC is not, as far as I am aware, an entity that is formally recognised by Government or the Uttlesford electorate. Rather, it is a pressure group primarily driven by Stansted Airport. Given that the LSCC has no standing in Local Planning matters, its mention here is inappropriate and, if anything, implies bias towards the aspirations of Stansted Airport without full and proper consideration. Para 2.13 states that house prices have increased by 21% since 2011 but this is meaningless unless put into context. After the Government announced potential extra runways at Stansted Airport in 2002, Uttlesford house prices declined noticeably against average Essex prices, especially for detached or semi-detached houses. That decline almost certainly started to reverse soon after BAA dropped its planning application for a second runway in May 2010.(PSLP 640) • Spatial Objectives Theme 1: we fully support the proposed sustainable travel modes; however, facilitating the provision of sustainable smart travel solutions will entail creating non-motorised user paths along with the provision of rapid public transport etc. and it is vital that all new off-road paths should be accessible to all vulnerable road users namely walkers, cyclists, equestrians and the disabled. Whilst these spatial objectives are necessarily written broadly, such intentions should be embedded from the Vision and Objectives so that they cascade down throughout the whole Plan.(Flich Way Action Group PSLP 636) • The Spatial Vision sets out at para's 4 and 5 aspirations as to what new developments/new housing will be like, but does not say anything about protection of existing housing, compatibility with the scale, appearance and materials of surrounding buildings, or minimising the impact of such developments on neighbouring properties by appropriate mitigating measures.(PSLP 422) • Spatial Objectives Theme 1: The Plan is unsound as all such new off-road paths must be accessible to ALL non-motorised users, including equestrians, rather than the default option which tends to only cater for pedestrians and cyclists. Whilst these spatial objectives are necessarily written broadly, such intentions should be embedded from the Vision and Objectives so that they cascade down throughout the whole Plan.(PSLP
--	---

	<p>397 & PSLP 788)</p> <ul style="list-style-type: none"> • Section 2.19, Theme 1, Objective 1a - Meeting the Need for New Homes. There is a reference to ‘people with specific accommodation needs’. Clarity is required as to whether, for example, key workers and the elderly are included within this description. (Elsenham Parish Council PSLP 79) • The proposal for three garden communities presents a risk to housing delivery and therefore is not effective. A delay in the delivery of one of the garden communities will have significant implications for delivery rates and the associated five year housing land supply. (Bloomhall PSLP 179) • There is no mention of the lack of green space of any description, other than agricultural land as a significant lack of sports provision, formal green space, informal green space and access to green areas generally when compared with comparable districts or national standard; • 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; and • Support many aspects of the Spatial Vision but it does not appear to be followed by the detailed policies – so, for example: <ul style="list-style-type: none"> ○ 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 (and in fact the detailed policies will do directly the opposite in some cases, by forcing many more vehicles through the AQMA); ○ it refers to making Uttlesford a healthy place to live, but the Infrastructure policies later have no requirement to provide anything beyond a fraction of the national guidelines for green space or sports facilities, and there are no obvious strategies to deliver this objective; ○ it refers to there being sustainable alternatives to car use, but the Plan fails to provide for any, and there is no Infrastructure Plan or Sustainable Transport Plan to provide for any either; ○ subsequent policies provide that all new developments should be linked to facilities by high quality footpaths and cycle paths, but none of the developments which have already been approved anywhere in Uttlesford satisfy this criteria, and we are not aware that any of the ones proposed will satisfy it either. • Objective 1d sets out an objective to provide proper infrastructure with new developments, but the detailed Infrastructure policies completely fail to do so. The same applies to Objective 3a given the lack of spatial policies and infrastructure policies to achieve any improvement. .” (We AreResidents.org PSLP 2210) • The total number of homes in the West of Braintree Garden Community is not yet an absolute number as set out in this text. (Braintree District Council 2045) • Spatial Vision bullet 3 is welcome as well as Spatial vision - welcome bullet point 3 and reference to conservation and enhancement of the historic environment.(Historic England PSLP 1823) • The housing developments proposed are unacceptable, exceed those required by national policy, are not accompanied by the necessary new infrastructure, contain no requirement for affordable housing content, contain no requirement for environmental control and omit a requirement for new or retention of green spaces. (PSLP 1790) • Description of area in Spatial Vision is contradicted by proposals to
--	--

	<p>develop housing estates whilst decimating wildlife. Also ageing population points to need of affordable home for young people. Proposed development will increase car usage. Proposals will lead to the destruction of a 'distinct rural character'. (PSLP 41)</p> <ul style="list-style-type: none"> • Contradictions in Vision as:- <ul style="list-style-type: none"> ○ Objective 2B) Supporting Market towns but 2 garden communities near Easton, Gt Dunmow and Braintree will adversely impact on existing towns; ○ Objective 3A) Safe guarding Uttlesford distinctive character – creation of 10,000 homes will turn Easton and Gt Dunmow into suburbs of the new settlement ruining the setting, history and semi-rural quality in existing settlements. (PSLP 30)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Objective 1b Protecting and Supporting Rural Communities to be amended - specifically reference the role and importance of new housing in supporting villages and communities around the district throughout the plan period; (Landhold Capital Ltd PSLP2992) • Amend ratio of housing affordability to a ratio of 18 times the average income as well as amend associated policies accordingly; (Saffron Walden and Little Walden Neighbourhood Plan PSLP 2938). • Reword the Spatial Vision to highlight the important role that all of Uttlesford's most sustainable settlements can play in delivering new development; • Stansted Mountfitchet to be reclassified as a Local Centre; • The Spatial Vision Point 4 should be amended to read: "New development will be focused on the towns, local centres and larger villages where opportunities exist to deliver sustainable development which maximises opportunities for sustainable travel. New Garden Communities will also play a role, having been rigorously evidenced and planned. Development of all types across the District will be exemplars of 21st Century living providing well designed homes, high quality employment, services and facilities to meet the needs of residents and businesses. Uttlesford's communities will support a high quality of life for all and create healthy, safe and vibrant places for living and working." • A further bullet should be included along the lines of: "The housing needs of the District will have been met in full and in a timely fashion. Housing delivery will have kept pace with planned requirements through the life of the Plan and in line with the requirements of the Housing Delivery Test. This will have stabilised housing affordability and will have widened choices and opportunity in the housing market. A significant proportion of affordable housing will have also been delivered in the locations where it is needed. Uttlesford's communities will have benefitted, with the viability and vitality of their shops, services, clubs and community facilities having been strengthened. Businesses will have benefitted, with a larger workforce living locally." (Martin Grant Homes & Bloor Homes PSLP2880) • Reference to the West of Braintree Garden Community (WoBGC) should be deleted from all parts of the Plan as the Uttlesford proposed extension is wholly dependent upon the Braintree proposals (Bloor Homes Eastern PSLP 896). • In order to adequately reflect national planning policy objectives, point 6 of the spatial vision should be amended to reflect the 'three dimensions to sustainable development', specifically:

	<p>“London Stansted Airport will form a pivotal part of the highly successful London Stansted Cambridge Corridor; the social and economic benefits arising from London Stansted Airport will be harnessed and the environmental impact of London Stansted Airport will be effectively managed”;</p> <ul style="list-style-type: none"> • Objective 2c, first bullet: To provide clarity and ensure consistency with national aviation policy (Beyond the Horizon – The future of UK aviation: Making best use of existing runways, June 2018), it would be appropriate to amend the aim to read: “To accommodate development by: Making best use of Utilising the permitted capacity of the existing runway, and provide for the maximum number of connecting journeys by air passengers and workers to be made by public transport;” and • Objective 2c, second bullet: It would be appropriate to amend the aim to read: “Ensuring, through partnership working with Highways England, Essex County Council, Network Rail 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.” (Manchester Airports Group (MAG) PSLP 1471) • Change the Objective 3b to include the following additional point: • “Encourage new developments to incorporate green infrastructure in its design and long term management.” (Essex County Council PSLP 872) • Change paragraph 4 of The Spatial Vision to include the following sentence: “The new communities will be designed to support sustainable travel within and outside the community to the wider area”. (Essex County Council PSLP 870) • Remove all references to the ‘London Stansted Cambridge Corridor’ so that the Local Plan is not adopting biased terminology that favours a group of commercial lobbyists; • Reduce the projected figures for housing growth. (PSLP 2050) • The Uttlesford Draft Local Plan can be made legally compliant by the deletion of references within the Spatial Vision and Objectives to the West of Braintree Garden Community; and • The Spatial Vision should be amended as follows: “New development will be focused on the towns and larger villages with three new garden communities being built within the District. West of Braintree – jointly planned with Braintree District Council; Easton Park, and North Uttlesford Garden Communities. These new garden communities will be exemplars of 21st Century living providing well designed homes, high quality employment, services and facilities to meet the needs of residents and businesses. The new communities will be designed to support a high quality of life for all and create healthy, safe and vibrant places for living and working” (Stebbing Parish Council PSLP 2236) • The Spatial Objectives, and Objective 1b Protecting and Supporting Rural Communities should be amended to specifically reference the role and importance of new housing in supporting villages and communities
--	---

	<p>around the district throughout the coming plan period. Such an approach would be entirely consistent with paragraph 55 of the NPPF (2012). (Stonebond Properties PSLP 2708)</p> <ul style="list-style-type: none"> • Paragraph 2.8 – reference to “remnant” should be removed (National Trust PSLP 2495) • Change sought: redrafting of part 1 of the policy to read: “The majority of development will be focused at the towns of Saffron Walden and Great Dunmow and the new Garden Community at Easton Park”.(PSLP 2279) • The evidence suggests the Uttlesford District needs new affordable housing (10% is the minimum quota from the NPPF) and singleton homes (30% as the population ages and lives alone) as well as modest family homes shared amongst the villages that make up the rural character of Uttlesford. Others should be allowed to build their own homes as the New framework suggests either as individuals or as a co-operative.(PSLP757) • The housing numbers must be independently reviewed to confirm their validity. A full transport assessment must be carried out including all major road junctions within the district. Any road junction improvements must be defined, costed and scheduled. The proposed sustainable transport links must be properly defined, costed and scheduled. A full assessment of air quality impact must be carried out within the district and neighbouring districts. The spatial strategy should be reviewed in the light of the transport and air quality assessments and site selections should be modified if traffic levels cannot be supported in the relevant areas. The overall infrastructure plan must be properly defined, scheduled and costed and sources of funding identified. Where land value capture is required to fund these plans, then the method of achieving this must be secured. A proven methodology must be defined and agreed for delivery of the proposed new settlements. (PSLP 693) • Withdraw all references to London Stansted Cambridge Corridor unless such mention clarifies that body's objectives, membership and relevance to planning matters; • Qualify the statement in para 2.13 (PSLP 640). • Provision of multi-user routes with accessibility for all vulnerable road users – pedestrians, cyclists, equestrians and the disabled – is the default where provision for non- motorised routes is planned within or around any new developments; and • Linking of the Flitch Way where the route is planned to run via the existing and proposed developments around the southern part of Great Dunmow. Its inclusion in the Local Plan would go far to addressing issues of soundness and sustainability.(Flitch Way Action Group PSLP 636) • Amend Paragraph 5 of the Spatial Vision by inserting after the first sentence the following: "It will have been designed and constructed in a manner which minimises the environmental impact on neighbouring properties by use of appropriate mitigating measures." (PSLP 422) • Multi-user routes and full accessibility for all vulnerable road users – pedestrians, cyclists, equestrians and the disabled – is the default where provision for them is planned within any new developments.(PSLP 397 & PSLP 788) • Clarify whether key workers and the elderly are included within the description of 'people with specific accommodation needs' as stated in Section 2.19, Theme 1, Objective 1a (Elsenham Parish Council PSLP 79)
--	---

	<ul style="list-style-type: none">• Point four of The Spatial Vision should be reworded as follows: New development will be focused on the towns and larger villages within and bordering the district with three new garden communities being built within the District. West of Braintree – jointly planned with Braintree District Council; Easton Park, and North Uttlesford Garden Communities. These new garden communities will be exemplars of 21st Century living providing well designed homes, high quality employment, services and facilities to meet the needs of residents and businesses. The new communities will be designed to support a high quality of life for all and create healthy, safe and vibrant places for living and working. (Bloomhall PSLP 179)• Reinstatement of a paragraph noting Uttlesford’s carbon footprint and current unsustainability;• Set out the baseline position in Chapter 2 so that planning decisions can be influenced by the current deficits. Paragraphs covering both of these issues should therefore also be included, together with proposals as to how the existing deficiencies will be remedied;• There is a need to compare the detailed policies against the Spatial Vision and amend the detailed policies to reflect the Spatial Vision or to amend the Spatial Vision to reflect what the Plan policies actually provide. Given that the Spatial Vision would appear to present a more sustainable set of proposals than the detailed policies in fact do, we believe that the Plan policies, including the site allocations, should be amended to reflect the Spatial Vision;• We note Objective 2c, but are not aware of any evidence to support this objective, or to show that such expansion can be achieved sustainably. Unless such evidence can be provided, the objective should be deleted.• Paragraph 2.16 is incorrect. The wording of the paragraph needs to be updated to reflect the fact that “the AQMA is a 1.5km diameter circle around the town centre that includes the major air quality problem areas.” (We Are Residents.org PSLP 2210)• The exact number of homes on the site will be refined through the specific Development Plan Document (DPD) and master planning on the site. As such Braintree would recommend that the number in paragraph 3.32 and where it is repeated in the document (including paragraph 3.102) is amended to a range, as it is set out in policy SP8. (Braintree District Council 2045)• Objectives - Theme 3 : Change heritage to historic environment. (Historic England PSLP 1823)• Severely reduce the number of new houses;• Include the infrastructure measures required to support the population increases proposed and those already permitted; and• Include environmental control measures especially with reference to Stansted airport (Night flights, use of existing maximum capacity (PSLP 1790))• The Spatial Objectives, and Objective 1b Protecting and Supporting Rural Communities should be amended to specifically reference the role and importance of new housing in supporting villages and communities around the district throughout the coming plan period. (Landhold Capital PSLP 1283)• The numbers of houses proposed is preposterous and needs to be
--	---

	<p>significantly reduced (PSLP 41)</p> <ul style="list-style-type: none"> • An appropriate amount of land around Easton and Great Dunmow would be established as a national park insulating these communities from becoming just a suburb of the new city and part of the concrete corridor being created (PSLP 30) • Easton Park is not a suitable location because it is close to a major and flight paths with health hazards well documented, single ownership puts too much power into one owner and Great Dunmow scheduled for major development cannot cope with another major development nearby. (PSLP 17) • No development of garden communities until critical infrastructure is in place; and • Remove Easton Park from Local Plan as it is an unsuitable location for a new town of 10,000 houses (PSLP 2558)
3. Spatial Strategy	
SUPPORT	11
OBJECT	55
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Support identification of Newport and Thaxted as Key Villages (Countryside Properties PSLP 2762) • Support 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.(The Crown Estate PSLP 2742) • It is noted that the latest SHMA (2017) has been used to identify the housing requirement in the Pre-submission Local Plan, which has been endorsed in a joint MOU signed in March 2017 by East Hertfordshire, Epping Forest, Harlow and Uttlesford Council’s; and • This Council also welcomes the Local Plan’s recognition of Harlow’s role as major location for economic growth within the London Stansted and Cambridge Corridor reinforced through the importance of the Harlow Enterprise Zone. Harlow would, however, be willing to continue to work with Uttlesford Council to further quantify the employment land requirement to support strategic housing allocations.(Harlow Council PSLP 2309) • I have read through the spatial strategy document in policy SP2 of the draft local plan, I consider it to be sound and therefore support it.(PSLP 206) • Paragraph 3.24:- Welcome reference to conserving and enhancing the local distinctiveness and historic character of these rural settlements (Historic England PSLP1826)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • The protection of IWM Duxford in terms of its significance as a designated heritage asset and an operational aerodrome are not covered by national policy in sufficient detail nor are there other policies in the proposed plan to cover this.(Imperial War Museums PSLP 3054) • Paragraph 3.33 refers to provision of open spaces but there is no open space allocation in the Appendix Maps. (Saffron Walden & Little Walden Neighbourhood Plan PSLP 2939) • The Regulation 19 document lacks an evidence base as well as lack of “reasonable alternative” proposals.(Newport Parish Council PSLP 2999)

	<ul style="list-style-type: none">• Not clear that all reasonable alternatives have been considered;• Effect of higher delivery rates and higher dwelling numbers leading to need for few Garden Communities not considered;• Absence of alternative scenarios that would meet the OAN means that it is not clear that all reasonable alternatives have been considered or that the strategy has been properly justified;• The Council considered only sites submitted to them and did not undertake a holistic review of their district to identify the locations that are most appropriate, having regard to landscape and environmental capacity and transport assessments;• It is not clear that the strategy can be properly justified until further detailed assessments are undertaken to understand the ability to mitigate the significant challenges identified in the SA associated with water quality and heritage conservation;• It has not yet been demonstrated that the Garden Communities allocations – either for the Local Plan period or in full – are deliverable, that their impacts can be properly mitigated, or that the assumptions surrounding self-containment are achievable;• It is not yet clear that the spatial strategy can effectively meet the housing need arising from Uttlesford rather than that from South Cambridgeshire;• The spatial strategy is heavily reliant on Garden Communities to meet the District’s housing need, however their deliverability – over the plan period and in full – does not yet appear to have been proven.• A detailed review of the IDP that does not identify definitive timings or thresholds for the delivery of infrastructure. (The phrase “it will be for the masterplan process to establish when [x] will be delivered” is used frequently). It is therefore not yet clear how the Viability Study can be relied upon to evidence the viability – and therefore the deliverability – of the Garden Communities.• In reference to NUGC, there is no indication that the impact of the full 5,000 allocation has been assessed over its proposed build-out time by the transport studies;• The Local Plan identifies no minimum or targeted quanta of development to be delivered at the Garden Communities except for housing. Without assurances over the delivery of employment floorspace and social infrastructure at the Garden Communities, it is not clear how the modal shift necessary to secure the self-containment sought at the Garden Communities;• It is yet not clear that the R19 LP modal split for NUGC is deliverable.• It does not appear that the spatial strategy has taken account of Wellcome’s plans to provide 1,500 homes as part of its expansion.• Inspection of the Uttlesford Strategy Flood Risk Assessment (2016) suggests that the full NUGC site allocation area was not assessed at the time that the district-wide flood risk assessment was undertaken. (Quod Ltd PSLP 1532)
--	---

	<ul style="list-style-type: none"> • The Presumption of no development Outside the Development Limit is too fierce. In general there were more dwellings in our rural landscape historically than there are today. (PSLP 2934) • Paragraph 3.100 envisages the main route out of the Chesterford New Village/Town to be the A11 and minimising impact on the A505; and • Paragraph 3.101 says dualling the A505 and making the M11 Junction 9 two way to occur after 17 years. These are both unrealistic. All the above need to be done in the first 5 years of the development. (PSLP 2932) • Paragraph 3.48 makes no mention of improving Junction 9 of the M11, which is vital if development adjacent to Chesterford and at the Genome Centre is to proceed. (PSLP 2930) • Paragraph 3.39 says Type B villages should have 'No new allocations for housing development and yet paragraph 3.65 talks of 'windfall sites' will continue to be permitted for up to 70 dwellings per year and SP2 gives criteria for development in Type B villages. (PSLP 2929) • Paragraph 3.33 addresses the 315 dwellings to be built in Saffron Walden but without detail. (PSLP 2928) • No clear and logical explanation on how the OAN figure used in the Plan has been determined; • Adoption of the Plan implies considerable growth in passenger car numbers, major infrastructure requirement and 'quality of life' ramifications; • Sustainability Appraisal regarded as 'woolly in nature'; • No mitigation measures or recommendations are proposed or have been throughout the plan-making process; • Highly debatable if a council of UDC's calibre and size could achieve successful delivery of the Local Plan over the period. (PSLP2651) • Objection to the plan as a whole but the site for the North Uttlesford Garden Community has limitations and constraints on accessibility (Abington Park Farm PSLP 876) • Uttlesford's belated attempt at working with South Cambridgeshire is too little to have had a meaningful impact on the Plan (and is thereby inevitably starting from a flawed position); • Para 6. P51: Uttlesford District Council has not achieved any of this (transport measures) in existing settlements, so why should it suddenly be transformed in the new Garden Communities – this is in contrast with Cambridge/South Cambridgeshire (Wendens Ambo Parish Council PSLP 2428). • It is not Positively Prepared in that it fails to address development and infrastructure requirements with respect to the New Garden Communities. • It is not Effective in that the plan proposals are not deliverable over its period. • The detailed reasons for the above assertions are as follows: -
--	--

	<ul style="list-style-type: none">• Inspector Mr Roger Clews who is carrying out the Inspection of the Braintree, Colchester and Tendring Plan has found that the proposed West of Braintree New Community is not deliverable primarily because the financial plan is not viable. In that approximately 15% of the UDC plan relies on this joint community then at this time the housing numbers required in the UDC Plan cannot be delivered in the plan period.• UDC has failed to consider altogether the financial viability of its plan; hence the financial viability of the proposed New Communities at North Uttlesford and Easton Park cannot be demonstrated to be financially viable.• Braintree, Colchester and Tendring had planned to commence the construction of 3 New Garden Communities in their overall administrations. The UDC Plan looks to 2 – 3 New Garden Communities in our single administration. Mr Clews considers that the less ambitious plans of the 3 administrations are over-ambitious and not deliverable, hence by comparison, the UDC ambitions cannot logically be considered deliverable. I would however suggest that by the formation of Development Corporations under new regulations laid down this year, viability could be achieved. UDC however has presented no such plans.• Mr Clews further commented that Braintree, Colchester and Tendring had deferred too much of the detail into the future Development Plan Documents (DPDs). This UDC plan has deferred EVERY detail of the New Communities into the future DPDs and so again by comparison and hence the UDC Pan must be considered unsound.• The inspection of the West of Braintree plan found that it is short of a deliverable road strategy. This is also a significant part of the UDC Plan and so will also make the UDC Plan unsound.• In addition to the individual road strategy in e. above, UDC has failed to provide a credible overall road strategy in a number of important areas: -• Two new communities are proposed with total homes of 5,000 and 10,000 both with a single road entry. Such bottlenecks will be unworkable and result in major traffic blockages.• A proposal for a major expansion of Stansted Airport will have major transport implications and yet there has been no integrated consideration of the cumulative effects. Without such a consideration no Plan can be considered sound.• The UDC Plan contains no resolution of the road issues in Saffron Walden Town and the consideration of the continuing illegal level of pollution in the Air Quality Management Area. Ambitious levels of Modal Shift will be required in the proposed New Communities and yet there is no credible consideration of the manner of achievement of this shift. In particular the Braintree, Colchester and Tendring Plan proposes a new Rapid Transport System linking Colchester New Community to Mark Tey Community to West of Braintree New Community and then potentially on to Easton Park New Community and
--	---

	<p>Stansted Airport. It is key for the Modal Shift that this System is implemented (at a probable cost of over £1 Billion). This cost is excluded from the financial consideration of the New Communities and there is no credible evidence for the delivery of the Transport System. (Cllr Lodge PSLP 2396)</p> <ul style="list-style-type: none"> • Technical Note 7 of the District-wide Transport Study by WYG has considered the impact of development in this Plan alongside that already planned by neighbouring authorities, including growth planned by St Edmundsbury Borough Council in Suffolk. An assessment has been made of the impacts on the A1307 – a key route between Haverhill in Suffolk and Cambridge. It shows that the A1307 is already experiencing significant stress in respect of link capacity, and that growth in Uttlesford will contribute additional traffic to these routes. The Greater Cambridge Partnership is coordinating work on the A1307 corridor and Cambridgeshire County Council will seek contributions from development in Uttlesford, as appropriate. (Suffolk County Council PSLP 2382) • Carver Barracks should be a consideration in the Local Plan; • Uttlesford District Council is too small to successfully manage implementation of 3 contemporaneous Garden Communities; • Development of Garden Community at Easton would adversely affect the southern part of the district forever; • Proposed development at Easton Park will require transportation infrastructure; • Compulsory Purchase powers should be used to ensure affordable homes; • Danger of creating an urban sprawl from Stansted Airport to Braintree due to the proximity of Easton Park, West of Braintree Development, Little Easton and Dunmow. • Loss of heritage and protected areas. (PSLP 1912) • Paragraph 3.123 as written, states that "London Stansted Airport, as London's third airport, puts significant pressure for development on the surrounding countryside". However, this wording does not reflect that the airport company and its operation of the airport do not place pressure on the surrounding countryside. Currently, the text is misleading and the Council should clarify therefore what pressure for development the CPZ is attempting to protect against. (Manchester Airports Group (MAG) PSLP 1518) • The Green Belt Review fails to fulfil its purpose in only considering large tracts of land, within which there are many varied landscape characters and different types of land. The Green Belt Review, and thus the draft Local Plan, has failed to properly assess the potential contribution that the Site can make to meeting housing need. (Trustees of N Streeter Will Trust - John's Fund PSLP2856) • Paragraph 3.80 of the plan states that delivery of the Garden Communities will commence in 2022/23. However, it should be made clear that this is
--	---

	<p>an estimated date, and in any event, the Housing Trajectory indicates that West of Braintree will not commence until 2025/26 so the statement is misleading. (Land Securities PSLP 2616)</p> <ul style="list-style-type: none"> • Insufficient community involvement and any representations by the local community have been ignored; • The Plan has an insufficient Sustainability Appraisal as policies do not reflect realistic social, economic and environmental factors, and many policies such as on Air Quality or Sports provision are missing; and • There is a significant lack of evidence and the methodology employed to produce evidence is often flawed, such as in producing the number of houses required; and • The Plan is incomplete and not based on sound evidence. (PSLP 2192) • Housing numbers are 2,700 too high; • Methodology for arriving at housing target of 14,000 is obscure; • Housing densities are too high for a rural area; • Unlikely to achieve a build rate that would maintain a five year land supply; and • Section 106 agreements are not working in Uttlesford (PSLP 2180) • Little technology being leveraged in the plan only token references to electric vehicles and broadband (PSLP 1117) • The fact that West Of Braintree has been under the microscope of one Government Inspector already and has been shown to be unsound Mr Clews Letters 8th June 2018 and 2nd August Would indicate that West Of Braintree in the UDC local plan would also be shown to be unsound; • UDC has shown no signs of cooperating with the communities or other councils. (PSLP 263) • Proposed housing number too high for Uttlesford; and • No evidence of cooperation with South Cambridgeshire District Council (SCDC), which borders proposed North Uttlesford Garden Community (NUGC) (PSLP 257). • It is principally with regard to transport that this plan is non-compliant. The most sustainable, least polluting form of transport is the railway network, but this is ignored in this plan. Getting the railways right must be at the heart of a sustainable transport policy. In failing to do so, I believe this plan is unsound. (PSLP 137) • This plan and the council are not being proactive in strategies to mitigate and adapt to climate change, and the plan has not been developed in line with the Climate Change Act 2008; and • The plan does not acknowledge targets or sets priorities for developers (PSLP 125) • All access from the 3 proposed developments will be onto the A120 and the road is already at capacity. (PSLP 42) • Paragraph 3.48 promotes the growth tourism, including Hatfield Forest National Nature Reserve. In response to the Regulation 18 consultation
--	---

	<p>the National Trust objected to the reference to Hatfield Forest in this paragraph. As previously requested, the National Trust requests that reference to Hatfield Forest is moved to the following bullet point which is concerned with protection of the environment, rather than promoting growth and capitalising on the Forest. (National Trust PSLP 2496)</p> <ul style="list-style-type: none"> • Paragraphs 3.56 – 3.62:- The formulae used to forecast housing requirement is flawed as it based on years of exceptionally high housing growth, historic low interest rates and record high migration but trend has changed; • Paragraphs 3.60 – 3.61:-The Plan overstates the need for homes and does not address requirements for communal residential establishments; • Paragraphs 3.99:- The impact of the NUGC has been based upon assumptions which are not backed up by evidence and in the absence of any planned future increases of public transport provision, and in light of the distance of the settlement from any other employment or services centre, there is no evidence base for the statement “with trips by active modes and public transport making up 60% of all trips” and it should be withdrawn as statistically unsound. (Saffron Walden Town Council PSLP 2320) • Paragraphs 3.33:- “New [...] open spaces will be provided”. This is not backed up by any open space allocation in the Appendix Maps, therefore the Plan fails the NPPF to allocate appropriate sites to satisfy this need. (Saffron Walden Town Council PSLP 2318) • The report of the NEA Inspector leads us to conclude even more strongly that the satisfactory remedy for the scale and distribution of housing development which would enable housing requirements would be considering level of development in villages. (Eclipse Planning Services PSLP 2280) • The proposed plan does not meet the conditions laid down by the National Planning Practice Guidance regarding flood risk, landscape impact, conservation of heritage and the amenity impact on existing and potential inhabitants of the surrounding area and within the proposed local plan. (PSLP 2121) • The proposed local plan does not adequately explain how the subsequent issue of increased traffic into Saffron Walden, already suffering from significant congestion and air pollution, will be dealt with. (PSLP 1019) • Increasing housing in Uttlesford will place undue pressure on existing infrastructure that is already busy, this is not limited to roads, parking, school and places. Increased pressure from traffic will lead to a reduced quality of life for residents due to road noise, congestion and reduced air quality. (PSLP 1006) • There is almost no actual information on the delivery of the proposed development, with regards to accountable organisations or individuals actually keeping the extraordinary promises it seems to make regarding NEW facilities, transport and infrastructure;
--	--

	<ul style="list-style-type: none"> • The evidence has been kept in highly fragmented form and there seems to be no audited and consolidated documentation for the figures used in making this plan; • There is insufficient information to base any judgement on the level of efficacy for either the initial 15 year period or the ongoing pain in the area for the following undefined era of growth; and • Given the issues with local flooding, damage to the regional aquifers by the project, the enormous anticipated ebb and flow of commuting, loss of arable land loss of scenery and loss of access to historical sites of great archaeological significance etc. I find it impossible to describe the local plan as sustainable. (PSLP 1004) • Paragraph 3.66 - The housing numbers have been widely questioned by members of the public since their first publication. In particular: <ul style="list-style-type: none"> ○ The proportion of households assigned to Uttlesford by the ORS consultants' report (25.8%) is higher than that by the GLA (21.7%). This represents a difference of c. 2000 but no explanation has been offered ○ The latest population forecasts for Uttlesford are lower than previously stated ○ The policy on inclusion of care home/sheltered housing is unclear and inconsistent; both historically and with neighbouring districts ○ The annual housing requirement has been backdated to periods in the plan when it did not apply ○ Some committed developments have been missed out of the figures <p>These discrepancies cast doubt on the validity of the housing targets in the plan. (PSLP 697)</p> • Very little consideration has been given to traffic volumes, parking facilities at Saffron Walden, Great Chesterford Station and other area where there is already traffic congestion. Science parks and Stansted Airport unlikely to provide enough jobs for people in new settlements. (PSLP 651) • The plan does not address legally binding climate change targets nor is it consistent with National policy with regard to sustainability. (PSLP 650) • Paras 3.44, 3.45, 3.48, 3.52 and 3.55 refer to London Stansted Cambridge Corridor or "Innovation Corridor" without clarifying that this non-statutory, non-elected pressure group is primarily driven by Stansted Airport. It is inappropriate to justify a general Plan based on one view that has not been tested through elections or legislation. (PSLP 641) • The Local Plan KEY DIAGRAM is positively prepared providing a diagrammatic depiction of a sustainable distribution and pattern of plan led growth within the District. The Key Diagram is positively prepared to provide delivery of new homes at sustainable locations close to the A120, Stansted and Braintree as well as to the north of the District whilst also maintaining the Metropolitan Green Belt and Countryside Protection
--	--

	<p>Zones to the south west of the District. (PSLP 1996)</p> <ul style="list-style-type: none"> • The Plan fails to identify, in accordance with NPPF para 47, a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements. We consider that there is insufficient evidence to demonstrate that the Council has a successful history of delivering housing through their windfall sites; and • The principle of the Council's proposed Garden Communities is not disputed; however, it is still considered that insufficient lag-time has been projected to allow for infrastructure to be delivered across these Proposed New Settlements in advance of the early phases of the schemes. (Bovis Homes Ltd PSLP 2692) • At no point does the Council appear to have considered whether the Site (Land off Stortford Road, Birchanger O6Bir15) 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. (Birchanger Hall Farms PSLP 2844) • Paragraph 3.44:- As a neighbouring authority, Hertfordshire County Council (HCC) should be included on the list of adjoining local authorities that are identified in this paragraph. (PSLP 2653) • Is the provision for 504 Care Home Spaces sufficient for an ageing population? (Birchanger Parish Council PSLP 2519) • Paragraph 3.59: <ol style="list-style-type: none"> a) The calculations of housing need that use one basis to calculate the total for the four SHMA districts, but a totally different basis to divide it between the districts, are both illogical and implausible; b) The district has experienced one of the very highest housing growth rates so far this century and it is now proposed to make it virtually the fastest growing district over the 22-year plan period. No justification for this is offered; c) A comparison with the housing growth proposed for Epping Forest district is most telling. Despite every government projection showing Epping needing a much higher rate of growth, it is proposed that Uttlesford's should be higher. No justification is offered; d) With new government projections due out in a matter of weeks that are expected to show significantly different figures, the production of the Plan is premature; and e) On the above grounds the Plan fails the soundness test of being justified (PSLP 2324). • Paragraph 3.60: This appears to be a tidying-up exercise as the Inspector did not address the issue regarding the mixing of ORS and GLA-based figures, referred to in my comments on paragraph 3.59. (PSLP 2331). • To be consistent with the other three districts in the SHMA area UDC
--	--

	<p>should withdraw the care home places figure from the housing need calculation. (PSLP 2333).</p> <ul style="list-style-type: none">• A huge amount of new development is proposed or has already been approved for Great Dunmow;• UDC has repeatedly proposed significant new development for Saffron Walden, despite the obvious east-west traffic and air pollution implications, and the lack of sustainability;• The Saffron Walden transport study shows that Saffron Walden’s road system cannot sustain further significant development, and indeed cannot sustain the level of development already approved;• Given that even greater expansion of Saffron Walden or Great Dunmow is unsustainable, the only alternatives are significant development in the villages or the construction of new settlements. Although we have seen no Comparative Sustainability Appraisal, we can fully understand that significant additional development in any of the existing villages is unsustainable;• On this basis the Spatial Strategy to concentrate the bulk of the new housing requirement, beyond that already approved, in one or more new settlements is the only practicable spatial strategy;• We therefore agree with the Spatial Strategy insofar as it concentrates future new development in one or more new settlements. We also support the adoption of the “Liverpool” methodology which the Council are finally proposing to adopt as provided in para 3.71;• We do not believe that UDC’s reliance on the use of private sector developers to deliver new single site settlements on the scale required by the Council is achievable, certainly not if the TCPA principles are to be followed;• The draft Plan is silent on UDC’s proposals for a SPV (Special Purpose Vehicle, i.e. a council driven Development Corporation) to control its single site settlement(s). The absence of such a proposal, even in outline form, is unprecedented, hard to believe and likely to prove fatal to the draft Plan;• We have seen the Land Securities proposal for Easton Park, which claims that it will comply with Garden City principles 4-10 but not 1-3. Not only does this completely negate the TCPA principles as a whole but it also shows that the Local Plan proposed cannot be delivered since it is explicit that the TCPA principles will not be followed even though the draft Plan claims that they will;• The Spatial Strategy allocations as set out in paragraphs 3.16 to 3.23 are incorrect and inconsistent with the rest of the draft Plan as they ignore the allocations which have already been approved but still form part of the 2011-2033 new home provision;• We disagree with the settlement hierarchy set out in paragraphs 3.12 and following and SP2, as it conflicts with the evidence base and the Spatial Strategy, and it serves no sustainable purpose. Saffron Walden and Great
--	---

	<p>Dunmow are placed at the top of the settlement hierarchy as the two existing towns in the district, but neither can sustainably accommodate significant future development, other than that already approved;</p> <ul style="list-style-type: none">• Paragraph 3.33 is factually incorrect in that it claims “the town provides good opportunities for further walking and cycling”. There has been a failure to deliver any material additional cycle facilities to Saffron Walden since the latest Cycling Strategy was published and in 2015 both UDC and ECC Highways have rejected all of Saffron Walden Town Council’s proposals for cycle improvements and have since stated that they are not aware of any that can be delivered;• In relation to paragraphs 3.59-3.62, we are greatly concerned about the scale of housing development proposed for Uttlesford, which appears to be proportionally much greater than almost anywhere else in the country, and it is not clear to us that it is justifiable;• Failure to properly account for supply between 2011 and 2017: It seems that in the Regulation 19 draft UDC is using a faulty ‘revisionist model’ to determine housing need. Specifically the model used in this draft of the Plan has assumed that 641 units pa are needed for each year of the Plan, backdated* to 2011;• It is not clear how the overall need numbers have been arrived at – the proportion of new homes assigned to Uttlesford in the ORS report (25.8% of the total in the study area) is significantly greater than that assigned by the GLA in their assessment (21.7%); and• The policy on the inclusion of care home and sheltered housing requirements is unclear and inconsistent, including when compared with other districts, and we believe has led to double- counting of the housing requirements (<i>WeAreResidents.org PSLP 2214</i>)• No transparent process as to how UDC have arrived at the housing distribution and so locations that they are proposing; and there’s no systematic assessment as to why it is more sustainable (i.e. better) than any other distribution, as required by law;• No clarity as to how UDC propose to ensure that community benefits are realised from each of the new settlements;• There is no proper infrastructure plan. Uttlesford residents have been let down time and again over the last 10 years by UDC’s failure to force developers to provide proper infrastructure to support new developments;• There is no sustainable transport plan at all. Given that most residents of the proposed new developments are likely to be commuting out of Uttlesford to work;• Whilst UDC has commissioned a Transport Study on the effect of the new plan on principle link roads in the district, they have not commissioned any assessment of the effect of development on existing towns and villages, where most of the capacity issues are at present; and• UDC has repeatedly refused to commission an Air Quality Assessment to
--	--

	<p>show the effects of new development on air quality, particularly in Saffron Walden, where air pollution has been at illegal levels for most of the last 12 years.(PSLP 2116)</p> <ul style="list-style-type: none">• Any development supported through improvements in rail capacity linked to Crossrail 2 should be explicitly recognised in the Uttlesford Local Plan. (Transport for London PSLP 2114)• Paragraph 3.105:- Historic England would comment that the illustrative masterplan in the HIA currently shows development within the RPG leading to partial loss of this heritage asset and thus harm. We appreciate there is on-going work in relation to the HIA and also the policy wording and so, as yet it is perhaps premature to state that the policy includes appropriate wording to mitigate landscape and heritage impacts (Historic England PSLP 1856).• Notwithstanding our in principle objection to the North Uttlesford Garden Community at Great Chesterford, we offer our comments on paragraph 3.97. Again, we welcome the mention of the HIA and note that the HIA concludes that development of the North Uttlesford site has the potential to harm the significance of heritage assets. Historic England agrees with this conclusion. There is on- going work in relation to the HIA and also the policy wording and so, as yet it is perhaps premature to state that the policy includes appropriate wording to mitigate landscape and heritage impacts. As previously advised, Historic England have serious concerns regarding the suitability of this allocation per se both in terms of impacts on heritage assets and their settings a well as wider historic landscape impacts. .(Historic England PSLP 1853)• Paragraph 3.88:- We welcome the mention of the HIA and note that the HIA concludes that development of the Easton Park site has the potential to harm the significance of heritage assets. Historic England agrees with this conclusion. There is on-going work in relation to the HIA and also the policy wording and so, as yet it is perhaps premature to state that the policy includes appropriate wording to mitigate landscape and heritage impacts. .(Historic England PSLP 1837)• Paragraph 3.25:- Change historic to heritage assets....this is the most commonly used term (see NPPF glossary). Welcome the addition of reference to sites of archaeological interest. Also suggest that Registered Parks and Gardens should be included in this list. (Historic England PSLP 1827)• Paragraph 3.83:- Suggest the addition of a further bullet point to read 'conservation and enhancement of the historic environment' (Historic England PSLP 1830)• Paragraph 3.32:- We note the proposals for three new garden communities in the District at Easton Park, West of Braintree and North Uttlesford. We have previously raised concerns regarding the garden communities. We welcome the additional work that has been undertaken in the production of detailed Heritage Impact Assessments and revised
--	--

	<p>policy wording for these new garden communities. However, there is still on-going work to finalise the HIAs. The outcome of the HIAs will need to inform further revisions of policy wording which we would hope to agree with the Local Planning Authority in a Statement of Common Ground. Notwithstanding this, it is our considered view that whilst there may be scope for some development at Easton Park and West of Braintree, subject to suitable mitigation as identified in the HIAs, we continue to have an in principle objection to the site at North Uttlesford both in terms of the impact on heritage assets and their settings and the broader historic landscape and visual impact of the proposals. (Historic England PSLP 1828)</p> <ul style="list-style-type: none">• Paragraphs 3.8 – 3.22:- We welcome the inclusion of this section on development of alternative strategies and new settlement site selection. However, Historic England continues to have concerns about the New Settlement site selection process. It is our view that, from the information we have seen, the selection process seems to have been very biased towards access and transport, with comparatively little consideration/weight having been given to the historic environment. For example, in the SA summary table, there is only one brief mention of heritage in relation to Dumnow and no mention of the historic environment in respect of the chosen new settlements. Paragraph 7.4.5 of the Sustainability Appraisal itself considers new garden communities and assesses them against the sustainability objectives including objective 4 in relation to the historic environment. The SA concludes uncertain impacts when in our view it is clear that there would be major significant impacts from the development proposed. The SA plays down the potential impact and is therefore somewhat misleading. In addition, Appendix 4 does not consider the full quantum of development currently being considered for each site (eg only 2,500 dwellings at Great Chesterford). Overall the selection process appears to have been very driven by transport. Whilst we understand that further work is being undertaken to map out the site selection process, this would appear to be retrofitting the evidence for a decision already taken.• It is our considered view that insufficient weight was given to the protection of the historic environment at this stage in the process. The NPPF makes it clear that great weight should be given to the conservation of heritage assets and that significance of a heritage asset can be harmed by development within its setting (paragraph 132 of the old NPPF, paragraph 193 and 194 of the new NPPF). Paragraph 152 of the old NPPF, paragraph 32 of the new NPPF states that in respect of Plan making, significant adverse impacts on any of the dimensions of sustainable development (which includes the historic environment) should be avoided and, wherever possible, alternative options should be pursued. The site selection process led to the selection of new settlement locations at North Uttlesford (Great Chesterford), Easton Park and West of Braintree. Given
--	--

	<p>the very rich historic environment at Great Chesterford and the significance of the inter-relationship between the Roman Temple, Roman Town and Fort together with the very prominent location of the proposed new settlement on the hill above these assets and in their wider setting and on the basis of the current evidence, we consider that a new settlement in this location would cause serious harm to the historic environment. (Historic England PSLP 1825)</p> <ul style="list-style-type: none"> • The Spatial Strategy fails many of its objectives regarding sustainability and transport for the following reasons: <ul style="list-style-type: none"> ○ For Stansted Airport to play a major part in this development plan, it must separate its access to the Coach and Train services and its associated parking requirements from those wishing to access it as an airport. ○ It can be seen from the Key Diagram on page 22, which references the relevant road structures referred to in the document that there is a very important road missing both in the diagram and missing from the grand plan. The B183 unlike the B184 is less able to sustain large volumes of traffic, contains many blind bends and is too narrow in many places large articulated lorries and buses ○ The impact of the Eastern Park development needs to be assessed in relation to the existing over-subscription of the B183. It can only become a major problem without this. ○ This road requires a radical approach for it to sustain the development plan as it stands. • The spatial and transport plans are unsound without any consideration of the impact on this road both for the success of the plan and its impact on the local communities. (PSLP 1930)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Add paragraph at the end of the Spatial Strategy section <i>“Imperial War Museum (IWM) Duxford sits immediately adjacent to the northern boundary of the district within South Cambridgeshire District. The museum is a significant national heritage asset, major visitor attraction, educational and commercial facility which delivers economic, social and environmental benefits to the region including Uttlesford district. The Air Safeguarding Zone at Duxford seeks to protect the future of IWM Duxford by ensuring that all proposals for development within this zone give consideration to the impact on the operation of the airfield. Applications for development within Duxford’s Air safeguarding Zone will be the subject of consultation with the aerodrome operator.</i> The safeguarding zone which extends beyond the district boundary into Uttlesford district should be formally recognised within the development plan by amending the policies map in the Local Plan to include the zone. An additional paragraph at the end of the Spatial Strategy section would cover this. (Imperial War Museums PSLP 3054) • This note has identified a range of apparent deficiencies in the R19 LP evidence base, which if left unanswered would suggest that the soundness of the R19 LP has not yet been demonstrated on a number of bases. It is

	<p>therefore not yet possible to recommend specific modifications to the R19 LP without further information on the matters raised. (Quod Ltd PSLP 1532)</p> <ul style="list-style-type: none"> • Paragraph 3.115 should be amended to read: "outside the Development Limit the general presumption is against development but exceptions may be allowed for single dwellings or 2 or 3 dwellings where some of the Type B village criteria are met and/or some sustainability criteria are not met and/or the proposed dwelling(s) would sit comfortably in the predominantly rural landscape. (PSLP 2934) • Make clear that Junction 9 of the M11 must be made 2 way and the A505 made a dual carriageway within the first 5 years of the Chesterford New Village/Town. (PSLP 2932) • Paragraph 3.39 should be amended to make clear that modest numbers of dwellings may be permitted in Type B villages provided SP2 is taken into account and great attention is paid to design, proportionality and limiting intrusion on neighbours. (PSLP 2929) • Basic guidance on the future road layout of Saffron Walden and where further residential and other development might best be located. (PSLP 2928) • The scheme could address these issues by adopting measures such as: • Internalisation of many movements that would otherwise have to travel off-site i.e. school trips, retail and healthcare. • Improvements at the A11 Stump Cross roundabouts to increase capacity and provide the main vehicular access point for the development site. • Construction of a new access junction onto the B184 that would include pedestrian and cyclist connectivity with Great Chesterford. • New pedestrian/cycle connections linking the site with Chesterford Research Park, Great Chesterford (rail station), Saffron Walden and the Wellcome Trust. • Examine opportunities for a pedestrian/cycle bridge or tunnel to deal with the barrier effect of the A11. • Investment, via S106 agreement funding, in improved facilities for sustainable modes at Great Chesterford Station with respect to out of peak period services. • A new public bus service connecting the Wellcome Genome Campus, Whittlesford Parkway, Granta Park and the site. • A "Northern Gateway" into the site which would promote and prioritise sustainable movement to the site via this location. (The full nature of the gateway is not fixed at present and the scheme proposals describe the type of facilities that might be achievable. These are discussed below in greater detail). • Support for strategic improvements to the A505, or to Junction 9 of the M11. • After completion of the A505 corridor improvements, S106 agreement investment in traffic management and public realm schemes in the villages of Great Chesterford, Ickleton and Hinxton to reduce rat running. • There are a number of ways of delivering the proposal for a Northern Gateway; however, in the view of Abington Park Farm, the North Uttlesford Garden Community should not proceed without the Northern Gateway being secured as an integral part of the proposal (Abington Park Farm PSLP 876)
--	--

	<ul style="list-style-type: none"> • In the absence of clarity as to a precise threat, the general principle of countryside protection set in context of the Government’s aviation policy for making best use of airports could be better reflected by the following change: “London Stansted Airport, as London's third airport, puts Without a proactive planning strategy, making best use of London Stansted Airport, could result in significant pressure for development on the surrounding countryside".(Manchester Airports Group (MAG) PSLP 1518) • A revised and improved Green Belt Review. (Trustees of N Streeeter Will Trust - John's Fund PSLP2856) • It should be made clear that this is an estimated date, and in any event, the Housing Trajectory indicates that West of Braintree will not commence until 2025/26 so the statement is misleading.(Land Securities PSLP 2616) • The evidence base must be properly prepared. All policies should be developed first and properly consulted on, with comments taken into consideration; • The Plan must have details on the significant infrastructure that is required for implementation which requires cross-boundary collaboration. • Policies and DPDs need to be written. • The evidence base needs to be accurate with sound methodology used – for example the numbers arrived at do not take into account changes in population and local growth which are lower than currently stated. • No reasonable alternatives have been considered and need to be.(PSLP 2192) • Adopt Community Infrastructure Levy and abandon section 106 agreements; • Embed sports provision (including land and funding); • Recalculate the housing numbers, using different ‘experts’ and mathematical models; • Reduce the upper limit for housing densities; and • Provide much better definition of what will be expected for the Garden Communities (PSLP 2180) • Reduce the numbers of houses planned. Keep them in the corridor. Improve the M11 and A120 before any houses are built. Do not approve MAG'S application for more capacity. Protect our wildlife by coming up with measures to reduce speeding on country roads (PSLP 42). • Need a detailed effective policing plan or impact of additional crime/social issues on existing communities; and • Settlements should be kept separate so as not to impact on existing towns and villages (PSLP 32) • The impact assessment of the NUGC on the area’s transport infrastructure should be recalculated based on known modes of transport. (Saffron Walden Town Council PSLP 2320) • Increase the numbers allocated to Type A and B villages, including the allocation of land at 6 Walden Road, Swards End (Eclipse Planning Services PSLP 2280) • Delete all references to London Stansted Cambridge Corridor unless such mention clarifies that body's objectives, membership and relevance to planning matters. (PSLP 641) • We would recommend that this garden settlement (Easton Park) is altogether removed from the emerging Local Plan and an increased level
--	--

	<p>of smaller site are allocated to ensure a sufficient housing supply is delivered. (Bovis Homes Ltd PSLP 2692)</p> <ul style="list-style-type: none"> • The conclusions of the LLA Green Belt Assessment (Appendix 1) clearly indicate that the Site (Land off Stortford Road, Birchanger O6Bir15) could be removed from the Green Belt without affecting the purposes and role of the Green Belt. (Birchanger Hall Farms PSLP 2844) • Any development supported through improvements in rail capacity linked to Crossrail 2 should be explicitly recognised in the Uttlesford Local Plan. (Transport for London PSLP 2114) • Paragraph 3.105 should include more detail in relation to heritage assets both on site and in the wider area and discuss appropriate treatment of these assets. This will need to be informed by the findings of the HIA. (Historic England PSLP 1856). • Paragraph 3.97 should include more detail in relation to heritage assets both on site and in the wider area and discuss appropriate treatment of these assets. This will need to be informed by the findings of the HIA. (Historic England PSLP 1853) • Paragraph 3.88 should include more detail in relation to heritage assets both on site and in the wider area and discuss appropriate treatment of these assets. This will need to be informed by the findings of the HIA. (Historic England PSLP 1837) • Paragraph 3.25:- Change historic to heritage assets....this is the most commonly used term (see NPPF glossary). Welcome the addition of reference to sites of archaeological interest. Also suggest that Registered Parks and Gardens should be included in this list. (Historic England PSLP 1827) • Paragraph 3.83:- Suggest the addition of a further bullet point to read 'conservation and enhancement of the historic environment' (Historic England PSLP 1830) • Paragraphs 3.8 – 3.22:- In order to make the Plan sound, it is our view that the decision regarding the location of the new settlements (in particular North Uttlesford Garden Community at Great Chesterford) should be revisited paying closer attention to the impact upon the historic environment and with a view to identifying an alternative location to Great Chesterford that would have a less significant impact upon the historic environment (Historic England PSLP 1825) • If a bye-pass road linking Braintree, Great Dunmow and Harlow cannot be found or developed some modifications to the B183 will be required as a short-term solution; and • In the long-term, the B183 will not be able to sustain the developments and the impact of the traffic needs and access to the M11. A long-term solution remains the best option. (PSLP 1930)
<u>Policy SP1 Presumption in Favour of Sustainable Development</u>	
SUPPORT	3
OBJECT	10
SUMMARY OF REPRESENTATIONS IN SUPPORT	Fully supportive of the inclusion of the policy on the presumption in favour of sustainable development; (Gladman PSLP 2787)
SUMMARY OF	<ul style="list-style-type: none"> • The assessment of housing needs uses an approach to assessing

REPRESENTATIONS IN OBJECTION	<p>demographic trends that is inconsistent with national policy. In addition the market signals uplift fails to reflect the severity of the affordability issues within the HMA and Uttlesford. as well as apply a market signals uplift that insufficiently;</p> <ul style="list-style-type: none"> • Insufficient account has been given to the risks that the Garden Communities will not meet the timetables established in the plan. No buffer has been applied to take account of this risk placing delivery of the requirement in doubt should there be any delays. • The stepped housing target and Liverpool approach to assessing housing land supply are not consistent with national policy which requires backlog to be addressed in the first five years of the plan. • Policy H8 is not effective or consistent with national policy and must be amended to be considered sound; • Requirements with regard to accessible homes in H10 have not been adequately justified and are inconsistent with guidance in PPG; • Implementation of HIAs on developments of over 50 units is ineffective and inconsistent with national policy which places the emphasis on plan makers to ensure the development it proposes supports improvements in health outcomes; • The higher than building regulation standard for broadband provision and minimising CO2 (<i>Persimmon Homes PSLP 2668</i>) • Concern over Council’s default position of approving planning applications where there are no relevant policies to the application or relevant policies are out of date at time of decision making; • The request to comment on Sustainability Appraisal is not mentioned in the Plan itself. (<i>Elsenham Parish Council PSLP 259</i>) • Failure of Settlement hierarchy to recognise Braintree and Bishop’s Stortford contribution to housing delivery and employment in Uttlesford; • Insufficient discussion has occurred between East Hertfordshire District Council and Uttlesford District Council regarding the potential of fringe sites around Bishop's Stortford to provide sustainable alternative locations for development. (<i>Bloomhall PSLP 182</i>) • Failure to articulate why the land south of Beldams Lane, Bishop's Stortford was not considered for development given its highly sustainable location in walking distance from the train station and the centre of town albeit being located within the Green Belt where it is not adequately fulfilling its functions; • Supporting text to address each area of search and provide justification for rejection or acceptance so as to demonstrate that all alternative locations have been fully considered; • Lack of evidence to demonstrate why areas of search identified in earlier Local Plan versions have been excluded; • Cross boundary discussions need to be noted to demonstrate the plan is justified and that all suitable alternative sites have been duly considered. (<i>Bloomhall PSLP 181</i>)
------------------------------	---

	<ul style="list-style-type: none"> • Supporting text (paragraph 3.8) fails to illustrate Council’s full exploration of cross boundary opportunities to deliver sustainable residential growth on the southern side of Bishop's Stortford, with its proximity to the M11 and A120 as required by paragraph 3.11; • Insufficient consideration has been given to the potential cross boundary opportunities with East Hertfordshire District Council to enable the development of the land south of Beldams Lane. (Bloomhall PSLP 180) • Policy is a paraphrase of NPPF paragraph 14 which adds nothing of local distinctiveness to what is already clearly set out in national guidance; • The appraisal of the overarching Policy SP5 and the policies for the three specific proposals do nothing to explain or justify the benefits of the preferred strategy. • The Sustainability Appraisal is deeply flawed in relation to Policy SP2 and other strategic policies in that, it constitutes an ex post facto rationalisation of the preferred strategy and does not show, as is should, how that strategy emerged from a range of plausible alternatives. (Eclipse Planning PSLP 2278) • SA Report authors generally made optimistic assumptions about garden Community benefits and negative assumptions about alternatives without evidence to support assumptions; • Assessments lack the necessary degree of objectivity and are therefore unreliable; • No evidence Rapid Transport System is viable; • It is unlikely that those extremely ambitious targets would be achieved or even approached unless rapid transit services to key destinations are available early on in the lifetime of the Garden Communities; • no evidence that the area can provide the necessary transport infrastructure, water supply, or employment opportunities required to support 20000 extra new homes; • There is no evidence that UDC is capable of delivering 3 GCs in the time scale given (PSLP 723) • The Draft Local Plan is not consistent with the NPPF:- <ul style="list-style-type: none"> i. Uttlesford has one of the 10 largest per capita carbon footprints in Britain, which UDC admit is unsustainable, yet there is no attempt to reduce it, and indeed reference to the problem has been removed from the Regulation 19 Draft. Transport emissions are the single biggest contributor to Uttlesford’s carbon footprint, but there is no sustainable transport strategy; ii. It is not consistent with many of the detailed requirements of the NPPF; iii. It is contradicted by the evidence base; iv. It does not reflect the vision of the local community (Residents for Uttlesford - R4U).
--	---

MODIFICATION REQUEST	<ul style="list-style-type: none"> • Where there are no policies relevant to the application, or relevant policies are out of date at the time of making the decision, planning applications will be refused unless overwhelming reasons can be produced for its acceptance. (Elsenham Parish Council PSLP 259) • The settlement hierarchy in paragraph 3.29 should be amended to read as follows so as to include the fringe towns of Bishop's Stortford and Braintree as areas where development would be supported: <ul style="list-style-type: none"> • Market Towns; • Fringe Towns; • Key Villages; • Type A Villages; and • Type B Villages and Hamlets • A new paragraph and table should be included after paragraph 3.34 to include the Fringe towns of Braintree and Bishop's Stortford. (Bloomhall PSLP 182) • Merge Policy SP1 with Policy SP12, subject to the changes recommended for that policy. (Eclipse Planning PSLP 2278) • Elsenham should be deleted from Key Villages (PSLP 2308)
<u>Policy SP2 The Spatial Strategy 2011-2033</u>	
SUPPORT	276
OBJECT	113
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • 160 respondents; “consider the spatial strategy outlined in policy SP2 of the draft Local Plan to be sound. I therefore support it”. • “No doubt the Council has taken full account of the proceedings at the recent N Essex Strategic Plan Part 1 Examination. In particular the robust scrutiny of the spatial strategy that was undertaken to ensure all reasonable alternatives had been considered and thoroughly tested against the selected strategy. Nevertheless Galliard is fully supportive of the spatial strategy to concentrate future development in the major towns and the garden communities, especially West of Braintree”. Galliard Homes; PSLP777 • Recognises that this is appropriate development and makes a valuable contribution towards the OAN. The plan is positively prepared, effective and justified and broadly consistent with national policy. (The Young Trust; PSLP1610) • Policy SP2 Has been positively prepared (Andrewsfield New Settlement Consort; PSLP1986) • Rosconn Strategic Land (RSL) support the identification of Elsenham as one of the “Key Villages” within the Spatial Strategy. Elsenham is an entirely suitable location to act as a major focus for development in the rural area to accommodate sustainable development and reinforce its role of providing services to the wider rural area, as justified by the supporting evidence base demonstrating the range of existing facilities and characteristics of the settlement and its functional relationship with the surrounding area. This is in accordance with the NPPF. (Rosconn Group ;PSLP2285) • We consider the spatial strategy, involving a combination of new Garden Communities and expansion of existing towns and villages, is the

	<p>appropriate choice of spatial strategy, given the housing requirement and capacity of existing settlements to accommodate growth. (Landsec; PSLP2587)</p> <ul style="list-style-type: none"> • We are broadly supportive of Policy SP2 and the objectives set out within the policy. Policy SP2 states that; Sustainable growth of London Stansted Airport will be supported in principle, subject to conformity with the environment and transport framework set out in Policy SP11 “ London Stansted Airport”. (Legal & General; PSLP2618) • The concept of the new independent Garden Communities deserves support with their location taking advantage of access to the major highways, namely the M11, A120 and A11. The need to be well-designed with the proper allocation of open space with community facilities. (Stansted Mountfitchet Parish Council; PSLP2626) • It is supported that Great Dunmow is identified as an important centre for residents who live in the southern part of the District, which will be the focus of the majority of development. (Bovis Homes; PSLP2690) • Although the Full Council vote on the Local Plan was not a unanimous decision for obvious local reasons, the final proposal for three new GARDEN COMMUNITY DEVELOPMENTS in specific locations is to be applauded. (Local uncertainty about large housing developments affecting villages, which caused serious anxiety for many residents in all Uttlesford's villages and hamlets, has now been assuaged.) 'I THEREFORE FULLY SUPPORT THE SPACIAL STRATEGY AS DETAILED IN THE LOCAL PLAN, AS A SOUND AND ACCEPTABLE SOLUTION FOR FUTURE DEVELOPMENT SCHEMES IN UTTLESFORD DISTRICT COUNCIL'S PARISH AREAS'. (PSLP617) • We consider the spatial strategy, involving a combination of new Garden Communities and expansion of existing towns and villages, is the appropriate choice of spatial strategy, given the housing requirement and capacity of existing settlements to accommodate growth. Additionally we note that due to the lead in time for development to commence at new settlements, the housing trajectory presently shows a reduction and shortfall in housing delivery between 2022/23 to 2027/28. Given the above factors, we consider there may be a requirement for Uttlesford to consider alternative options to ensure early delivery of housing, such as increasing the delivery rates for sites allocated in the Local Plan, or the addition of new allocation(s). (Landsec; PSLP2587) • paragraph 3.24 Welcome reference to conserving and enhancing the local distinctiveness and historic character of these rural settlements. (Historic England; PSLP1826) • The Local Plan KEY DIATRAM is positively prepared providing a diagrammatic depiction of a sustainable distribution and pattern of plan led growth within the District. The Key Diagram is positively prepared to provide delivery of new homes at sustainable locations close to the A120, Stansted and Braintree as well as to the north of the District whilst also maintaining the Metropolitan Green Belt and Countryside Protection Zones to the south west of the District. Andrewsfield New Settlement Consortium (ANSC) supports the identification, through the Key Diagram, of a Garden Community on the border of and within both Uttlesford and Braintree Districts. The Key Diagram accords with the development vision and master plan submitted by ANSC towards the Uttlesford Local Plan Call for Sites in 2015. (Andrewsfield Consortium; PSLP1996) • It is noted that the latest SHMA (2017) has been used to identify the
--	--

	<p>housing requirement in the Pre-submission Local Plan, which has been endorsed in a joint MOU signed in March 2017 by East Hertfordshire, Epping Forest, Harlow and Uttlesford Council's. Employment This Council also welcomes the Local Plan's recognition of Harlow's role as major location for economic growth within the London Stansted and Cambridge Corridor reinforced through the importance of the Harlow Enterprise Zone. Harlow would, however, be willing to continue to work with Uttlesford Council to further quantify the employment land requirement to support strategic housing allocations. (Harlow Council; PSLP2309)</p> <ul style="list-style-type: none"> • The A1307 is a key route between Haverhill in Suffolk and Cambridge. It shows that the A1307 is already experiencing significant stress in respect of link capacity, and that growth in Uttlesford will contribute additional traffic to these routes. This suggests that development in Uttlesford could be asked to contribute to either a specific scheme or a wider strategic scheme that addresses impacts on the A1307 (paragraph 5.4 of WYG Technical Note 7). The Greater Cambridge Partnership is coordinating work on the A1307 corridor and Cambridgeshire County Council will seek contributions from development in Uttlesford, as appropriate. (Suffolk County Council; PSLP2382) • PARAGRAPH 3.36 We support 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. (Savills; PSLP2742) • Overall CCC is supportive of this approach to housing provision in the UDC Local Plan and do not raise any objections under soundness or legal compliance. Overall CCC is supportive of the approach to employment in the UDC Local Plan and do not raise any objections under soundness or legal compliance. Although CC support the spatial strategy, in the light of the Inspector's Report into the North Essex Authorities Strategic (Section 1) Plan, UDC will need to be satisfied that the West of Braintree garden community allocation is deliverable (Chelmsford City Council; PSLP1760) • For these reasons the landowner is strongly of the view that the provisions in respect of draft Policy SP2 Hierarchy have been positively prepared and are effective in these respects as they are based on a strategy which seeks to meet such objectively assessed development and associated infrastructure requirements and are deliverable during the Plan period. This also clearly demonstrates that such an approach is justified in this regard as the most appropriate strategy when considered against the reasonable alternatives as based on proportionate evidence. (Landvest; PSLP1619) •
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • It talks of maintaining the Distinctive character of Uttlesford. 25,000 additional households would change the character forever. 10,000 of these on an ancient deer park will destroy the historic setting of Little Easton and Dunmow. The density of modern developments and the carbon copy style of houses will spoil the character of this rural part of Essex. (PSLP21) • The settlement hierarchy fails to take account of the opportunities for sustainable development on the edge of Braintree and Bishop's Stortford (the fringe towns) therefore the effectiveness of the plan and its ability to deliver the required housing is questionable due to the over reliance on

	<p>the three new settlements to deliver late in the plan period. (Bloomhill; PSLP183)</p> <ul style="list-style-type: none"> • The Council have clearly not sought to address meeting housing need now, in the next 5 years, as per the PPG. (Bloomhill; PSLP196) • It is taken as given that the key villages are as defined in Table 1, Section 3.36. But no justification is offered for the classification. As pointed out by various respondents to the Autumn 2015 consultation and the Regulation 18 consultation, there is an overwhelming case for the inclusion of Felsted as a “key village”. (PSLP201) • This does not equate to protecting the rural nature of the district. The only significant employment growth identified within north Uttlesford is at Chesterford Research Park. (PSLP306) • Road and rail transport facilities will not cope with addition homes. Motorists already rat-running through villages to avoid getting trapped in traffic (PSLP306) • The allocation of 40 houses in Rush Lane, Elsenham, is not supported, on the grounds that an excess of new housing has already been allocated to Elsenham; detailed reasons are given in the response to the allocation ELS 1 in Section 15. (Elsenham Parish Council PSLP312) • Too close in proximity of roads, The proximity of employment being in South Cambs and not Uttlesford. High landscape value and visual sensitivity of the site for NUGC (PSLP504) • The infrastructure improvements actually proposed here and in the transport policy TA 4 relate almost exclusively to the road network with no assurance of what sort of public transport should be provided in the suggested public transport corridor. (Bishops Stortford Civic Federation; PSLP587) • Increased traffic movements making it difficult to travel around in Saffron Walden (PSLP600) • Increased pressure on road network (PSLP615) • Increased pressure on schools and Doctors Surgeries (PSLP615) • Loss of habitat (PSLP615) • Lack of any mention of sports facilities or playing fields; lack of any air quality reports in the AQMA in Saffron Walden. Inadequate protection of our listed heritage from traffic and pollution (Saffron Walden Town Council and Uttlesford District Councillor; PSLP705) • Whilst Hatfield Heath must be considered a significant rural settlement within the Uttlesford District and has all of the existing facilities and services that could identify it as meeting the requirements of a key village, its location within the Metropolitan Green Belt prevents it from being allocated levels of development commensurate with the role of a Key Village. This being the case, the Local Plan would therefore be more meaningful and relevant if another rural settlement be identified and allocated the status of a Key Village, thus allowing it to be a focus for development. (PSLP709) • Considerable uncertainty about the delivery and funding of the transport infrastructure required for the three garden communities, and the assumptions about start dates and housing delivery rates at the garden communities are unrealistic. It appears that the market towns and key villages will have a significant role in the delivery of the spatial strategy. (Carter Jonas PSLP774)
--	---

	<ul style="list-style-type: none"> • There is a clear over-reliance on new garden communities in the spatial strategy; 34% of the total housing requirement of 14,000 dwellings is expected to be provided at the new settlements during the plan period 2011 to 2033, and 75% of the total number of dwellings to be allocated are in the garden communities. (Carter Jonas; PSLP774) • The Economic Viability Study (Pathfinder Development Consultants and Malins Associated Ltd (October 2016) and the Infrastructure Delivery Plan (Troy Planning June 2018) identify a number of highway and junction improvements and new public transport services that are critical to the delivery of each of the proposed garden communities, but in most cases the cost and funding arrangements are stated as unknown at this stage. (Carter Jonas; PSLP774) • The uncertainty about the funding and delivery of transport projects at the proposed garden communities in Uttlesford is identical to the concerns raised by the Inspector for the North Essex Authorities Strategic (Section 1) Plan. (Carter Jonas; PSLP774) • Housing numbers calculated using flawed data, population growth has been overstated. Most of the housing provision needed in South Cambs. (PLSP1791) • Lack of Transport Infrastructure (PSLP1794) • Future Employment projections at Stansted Unsubstantiated (PSLP1810) • We consider that the limitation of new homes in Type A villages to a total is 134 across the entire plan period is not justified as fails to provide opportunities for sustainable development to support the vitality of communities in accordance with paragraph 55 of the NPPF. (Strutt & Parker; PSLP1822) • New town an easy solution for political expedience (PSLP367) • Over-reliance on Garden Community to deliver housing need. (Stonebond; PSLP820) • Comments relates to paragraph 3.34. Reference to a new secondary school being delivered at Great Dunmow in paragraph 3.34 should be deleted. To meet forecast demand for secondary school places in the Dunmow area (excluding forecast demand from new settlements, which would incorporate new schools), ECC preferred option is the expansion of Helena Romanes School (HRS), which is achievable on the current school site. The potential relocation of HRS to the proposed education site has been a subject of discussion between ECC, HRS and UDC. ECC supports the plan to relocate the school subject to financial viability, and a proposal that does not require significant forward funding from ECC. (Essex County Council; PSLP873) • Further considerations need to be given to transport as area is gridlocked (PSLP1153) • The ability for the plan to deliver this ambition (Airport Growth) is however conditional on the appropriateness of the criteria contained within SP11 (a submission to that policy is made separately) which are not solely “environmental and transport” issues at suggested by this policy. Therefore, as written, the policy is too narrow in its definition and does not consider the wider social or economic issues that are introduced in SP11 or through national policy. (MAG; PSLP1486) • The housing target is based on incorrect assumptions re growth in the population (PSLP1517)
--	---

	<ul style="list-style-type: none"> • Dominates the landscape and will severely degrade the visual aspects of the landscape. It is impossible to mitigate this. (PSLP1517) • The Cambridge commuters who will live there will use the south Cambridgeshire road network to get to Cambridge, choking already overloaded roads. E.g. the A505 and The McDonald's roundabout in Whittlesford. • Too little parking for car users and no facilities for buses to safely drop off and pick up. There are no plans to improve the road network or public transport in the area so this is a product of wishful thinking on the part of Uttlesford. The residents of the Chesterford new town will try to reach Whittlesford via the road network for faster trains, and as per my previous point the road network is inadequate for peak traffic as it is. The consequence of a lack of transport infrastructure improvements will be a large amount of rat running through the group of historical villages in the vicinity. (PSLP1587) • Lack of Evidence (PSLP1537) • Fails to take into account local constraints when assessing housing need. (PSLP1555) • Lack of growth in Thaxted (Linden Homes; PSLP1574) • Should recognise the importance of existing settlements (Type A Villages) (Newfield Agricultural Holdings; PSLP1596) • Elsenham should not be allocated to the "Key Villages" category. This is against the background of the disproportionately excessive amount of development that has already taken place in Elsenham and that already in the pipeline: 116 houses to the west of Hall Road, 40 at the Nursery site and 20 near the playing field. (PLSLP1602) • ONS predictions (17/05/18) which state that there will be an expected population drop of 4,500. The indication is that between 1500 - 2000 fewer homes will be needed by 2033. This rather begs the question as to why UDC is ignoring this most recent data on our area's (PSLP2165) • There is no justification given as to why NUGC should differ from the current local pattern of commuting to work being only 20% non-car. The Plan gives no detail as to how public transport links would be improved. UDC's assumption on travel patterns therefore looks totally unrealistic. UDC accepts that in the long term strategic road improvements will be required in order to cope with increased traffic generated by NUGC, but does not commit to funding any necessary improvements. The foregoing 4 sub-headings demonstrate that the Local Plan would create significant traffic and transport problems which are not justified by the evidence submitted by UDC and for which no mitigation is offered. (PSLP2176) • Concerned about housing affordability (PSLP2178) • Lack of detail on the three new garden communities (Chase Mew Homes PSLP2198) • Schools and Doctors Surgeries have not been considered. (PSLP2299) • Lack of a "Brownfield First" policy to seeking land provision (CPREssex; PSLP2313) • Coalescence of existing settlements (Little Easton Parish Council; PSLP2353) • Carver Barracks Brownfield site not included in the plan (Little Easton Parish Council; PSLP2353) • The plan does not set out how the enhanced development land value will
--	---

	<p>be captured in order that the stated objectives for the settlements will be achieved. In the absence of effective structures to achieve this the risk remains that these become yet more isolated large developments of executive houses, with inadequate facilities. As building will continue for more than a decade, an overall development plan is required with outcomes for a sustainable housing/jobs balance, a mix of housing types and tenures, including low cost starter homes for both purchase and rent and include social housing. Essential infrastructure such as transport links, schools, shops and healthcare facilities must be provided from the outset. High quality overall design and professional delivery of garden villages will be critical to them becoming economically and socially successful communities that are desirable places to live. (Littlebury Parish Council; PSLP2401)</p> <ul style="list-style-type: none"> • Natural England’s overarching concern is the potential for the development strategy, alone, cumulatively and in combination with cross-boundary development, to impact on nationally and internationally designated sites. Key potential impacts include changes in air quality associated with increased traffic movements and increased levels of recreational pressure. Epping Forest SSSI, SAC and Hatfield Forest SSSI are likely to be significantly affected; however, sites such as High Woods, Dunmow, Quendon Wood and Elsenham Wood SSSIs may also be affected. The SA, informed by the findings of the HRA, will need to assess the impacts of Plan development, combined with cross-boundary development, on these sites and make recommendation to mitigate adverse impacts. The recommendations should be translated into detailed policy requirements to secure delivery of mitigation required to address adverse impacts through relevant development. Detailed mitigation measures and a mechanism for their delivery will need to be included within key policies “including, but not limited to, the Garden Community policies and Policy SP11 “London Stansted Airport. Similar requirements should be included within Policy EN7 “Protecting and Enhancing the Natural Environment to ensure delivery of required mitigation through smaller site allocations and planning applications. (Natural England; PSLP2451) <p>The proposed delivery timeframe for the GC’s and subsequent build out rates are totally unrealistic, bordering on naive and cannot be achieved. There will be a permanent 5-year housing shortfall and UDC have no control. The DLP is insufficiently evidence based and has been rushed to try and beat the January 2019 deadline. For the reasons stated in attached and via our Regulation 18 consultation response (see Appendix A) the DLP is not sound. No other conclusion can be logically reached. (Pelham Structures; PSLP2521)</p> <ul style="list-style-type: none"> • No evidence to justify spatial strategy. The spatial strategy generally has not been justified as the best strategy when compared with the reasonable alternatives. It is essentially just a housing site allocation; there is no economic strategy, no global warming, climate change or carbon footprint strategy, no environmental strategy, no sports, open spaces, health or well-being strategy, no green infrastructure strategy, no education strategy and no infrastructure strategy. LEARNINGS FROM SIMILAR ADJACENT LOCAL PLAN INSPECTION IGNORED: The similar and adjacent Braintree, Tendring, Colchester Local Plan was rejected because of an incomplete and un-costed Infrastructure Delivery Plan; lack of
--	---

	<p>evidence showing the financial viability of new settlements; and poor evidence to show that sites were selected objectively. Uttlesford's Local Plan has the same issues and these were not resolved in R19. The withdrawal of the Braintree Local Plan also removes one of UDC's 3 new settlements as one was shared with the Braintree authority, so UDC is unable to show the delivery of its new homes in the R1 Balance has not been struck between the growth proposed at through new settlements and the growth proposed in existing communities. (Axis Land Partners; PLSLP2705)</p> <ul style="list-style-type: none"> • Provision of infrastructure upfront could delay the delivery of housing. (Axis Land Partners; PLSLP2705) • Additionally, while calculating the 5 year housing land supply, it is considered that the Council have used the "Liverpool" method, which seeks to average out previous undersupply in an annualised manner across the plan period. The alternative, "Sedgefield" method, which is recommended in Planning Practice Guidance, aims to frontload the backlog into the first five years, in order to encourage growth and address needs in a proactive manner.(Stonebond Properties LTD; PSLP2707) 9 draft plan.(Residents for Uttlesford; PLSLP2596) • Alternative Sites Not properly Assessed incl Chelmer Mead, Landscape Appraisals indicate that Garden Community Sites are in topographically sensitive locations and unlikely to be able to deliver housing numbers within the emerging plan. (Baker and Metson LTD; PSLP2710) • Development in type A villages is constrained (Particularly Manuden (The Battlement Trust; PSLP2715) • 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. Evidence: NPPF and Appendix 2 (Gladman; PSLP2788) • M11 and A120 overcapacity. (PSLP42) • House Numbers are unduly high for the district and not justified (PSLP257) • Paras 3.44, 3.45, 3.48, 3.52 and 3.55 refer to London Stansted Cambridge Corridor or "Innovation Corridor" without clarifying that this non-statutory, non-elected pressure group is primarily driven by Stansted Airport. It is inappropriate to justify a general Plan based on one view that has not been tested through elections or legislation.(PSLP641) • Disregard to historic interests (PSLP651) • The proportion of households assigned to Uttlesford by the ORS consultant's report (25.8%) is higher than that by the GLA (21.7%). This represents a difference of c. 2000 but no explanation has been offered - The latest population forecasts for Uttlesford are lower than previously stated - The policy on inclusion of care home/sheltered housing is unclear and inconsistent; both historically and with neighbouring districts - The annual housing requirement has been backdated to periods in the plan when it did not apply - Some committed developments have been missed out of the figures These discrepancies cast doubt on the validity of the housing targets in the plan.(PSLP697) • Too little new technology is being leveraged. (PSLP1117) • As written, this paragraph states that "London Stansted Airport, as London's third airport, puts significant pressure for development on the surrounding countryside". The overall purpose of the Countryside
--	--

	<p>Protection Zone (CPZ) policy is supported, however this wording does not reflect that the airport company and its operation of the airport does not place pressure on the surrounding countryside. As detailed in the Stansted Airport Sustainable Development Plan (p.31) making best use of the airport can be delivered within the existing airport boundary. Currently, the text is misleading and the Council should clarify therefore what pressure for development the CPZ is attempting to protect against. (MAG; PSLP1518)</p> <ul style="list-style-type: none"> • Has not taken into account Wellcome’s plans to provide 1500 new homes. (Wellcome Trust PSLP1532) • We do not believe that UDC’s reliance on the use of private sector developers to deliver new single site settlements on the scale required by the Council is achievable, certainly not if the TCPA principles are to be followed. We understand that there has been no recorded instance in the history of the New Town movement in the UK where this model has been followed. Every significant new town development built to the TCPA principles has had a public sector oversight body which has provided an efficient and effective public sector Client side. UDC should insist on this model being followed for each of the proposed new settlements. (Residents for Uttlesford; PSLP2214) • Open Spaces are not backed up on policies map. (Saffron Walden Town Council;PSLP2318) • Not enough on communal and residential establishments despite aging community (Saffron Walden Town Council; PSLP2320) • Paragraph 3.61 Is the provision for 504 Care Home Spaces sufficient for an ageing population? (Birchanger Parish Council; PSLP2519) • Paragraph 3.80 Paragraph 3.80 of the plan states that delivery of the Garden Communities will commence in 2022/23. However, it should be made clear that this is an estimated date, and in any event, the Housing Trajectory indicates that West of Braintree will not commence until 2025/26 so the statement is misleading. (LANDSEC; PSLP2616) • Paragraph 3.70 Housing Trajectory and the five year supply See attached for representation in full. The stepped housing trajectory will result in an undersupply of dwellings within the first part of the emerging local plan period. The Council should be making every effort to meet their OAN on an annual basis. (Bovis Homes Ltd; PSLP2692) • Chapter 3 : Spatial Strategy Paragraph 3.33 “New” open spaces will be provided”. This is not backed up by any open space allocation in the Appendix Maps, therefore it is reasonable to assume that new open spaces will not be provided. Lack of provision of green space is unsustainable because future generations will not have access to enough green space to meet their health needs. (PSLP2928) • The continued operation and success of IWM Duxford has without doubt significant economic, social and environmental benefits for the region including Uttlesford district. As a significant and unique heritage asset of national importance, it provides employment opportunities and educational resources, and substantial local investment as one of the most popular visitor attractions in the region. 1.15 The protection of IWM Duxford in terms of its significance as a designated heritage asset and an operational aerodrome are not covered by national policy in sufficient detail nor are there other policies in the proposed plan to cover this. As such the following additions are requested to the draft Plan to ensure it is
--	---

	<p>positively prepared, effective and consistent with national policy. 1.16 The safeguarding zone extends beyond the district boundary into Uttlesford district. It is requested for the reasons set out above that the safeguarding zone be formally recognised within the development plan. This would be by amending the policies map in the Local Plan to include the zone. (IWM, Duxford; PSLP3054)</p>
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • A further tier to the hierarchy should be introduced after point 1, which reads as follows: Fringe towns of Braintree and Bishop's Stortford where sustainable development that is proportionate to the scale of the settlement will be supported The above change will make the plan effective by ensuring that housing delivery is distributed to sustainable locations across the district reducing the reliance on the new settlements (Bloomhill; PSLP183) • Evidence of the co-operation between Uttlesford and neighbouring properties needs to be demonstrated so as to justify the use of the Liverpool Method. (Bloomhill; PSLP196) • Delete the allocation of 40 houses at Rush Lane, Elsenham. Correct the error in 3.36. Clarify whether Hatfield Heath is a key village.(Elsenham Parish Council; PSLP312) • Add new para 4 as follows:"4. Where village envelopes in respect of Type A and B Villages are of a shape or in locations which are inconsistent with the environment or appear not to be of logical layout or design, the opportunity will be taken to consult with communities to alter the boundaries of the village envelopes as appropriate." (PSLP424) • Commission and make public the results of air quality studies and analysis in the AQMAs. Publish plans for mitigation of the impact of increased traffic on the town center of Saffron Walden and the effect of pollution on the inhabitants and the historic buildings. ((Saffron Walden Town Council and Uttlesford District Councillor; PSLP705) • Policy SP2, and in particular point 3 of this policy, should be amended to state that: New developments in the Type A and Type B villages will be limited be supported to help enhance or maintain the vitality of these communities with the emphasis being on: a) Enhancing and maintaining the distinctive character and vitality of the rural communities; and b) Shortening journeys and facilitating access to jobs and services: and c) Strengthening rural enterprise and linkages between settlement and their hinterlands. Additionally it is suggested that reference is added to the policy to state that appropriate allocations are made through the Local Plan including within Type A villages such as Henham to enhance and maintain the vitality of these communities. (Strutt & Parker PSLP1822) • We support Policy SP2 and the Spatial Strategy, albeit that we consider that the supporting text to Policy SP2 could go further to highlight the strategic advantages of the selected garden community sites, including NUGC. (Grosvenor; PSLP937) • We suggest changing 'enhancing and maintaining' to 'conserving and enhancing' the distinctive historic character to more closely reflect the wording in the NPPF. (Historic England;PSLP1829) • Delete all words after 'limited' in paragraph 3 of SP2 (Gardner Planning; PSLP2151) • West of Braintree extension should be deleted from the Plan. Additionally, for reasons given above and the evidence referred to in response to Policy SP8, the SA requires revision to re-assess the scores given to each option.

	<p>This will demonstrate that the West of Braintree should not be selected as a preferred option, as found by the Inspector examining the North Essex Strategic Section 1 Plan. (Andrew Martin Planning; PSLP2473)</p> <ul style="list-style-type: none">• It is recommended that Policy SP2 be altered to the following: ‘New developments in the Type A and Type B Villages will be approved providing they meet the following requirements’ In the context of residential development, such requirements could include respecting the character and scale of the existing settlement, providing sufficient levels of accessible open space, and providing at least 40% affordable housing. For employment development, existing points a, b, and c could still be included. Such an alteration is considered to make the plan sound, as it highlights the importance of Type A and Type B Villages in their ability to deliver smaller sites across the duration of the plan period. As it has been demonstrated that there is an incentive for the Council to consider allocating a wider range of smaller deliverable sites, it is recommended that our client’s site is put forward as an allocation. Our client’s site, Land North of Station Road and West of London Road (please see attached), is located in the Type B Village of Wendens Ambo. The village has a range of amenities and services and it is considered that Wendens Ambo has excellent transport links to other nearby locations. Wendens Ambo is served by two regular bus services, the 59/60 and 301. The 59/60 service runs between Haverhill and Saffron Walden, whilst the 301 runs between Saffron Walden and Bishop’s Stortford. It should also be noted that the village is served by Audley End railway station. The station has an off-peak service of two trains per hour southbound to London Liverpool Street and northbound to Cambridge. In addition to this service is the hourly CrossCountry service between Stansted Airport and Birmingham New Street via Peterborough and Leicester, which is also supplemented by an hourly Greater Anglia service running between Cambridge and Stansted Airport. Our client’s site comprises approximately 0.8 hectares of arable land on the eastern side of the village. The site is bounded by residential development to the south-west, with agricultural land to the north and north-west. The B1039 and B1383 bound the site to the south and east respectively. Access could therefore be achieved off either of these roads. The site is largely free from any physical constraints; it is located within Flood Zone 1 and has minor alterations in ground levels. It should also be noted that the site is well screened by a belt of trees to the south and east. The site is in a strategic location for employment development due to being an approximate 2-5-minute walk away from the existing employment area and railway station. Whilst the Grade II Listed Fighting Cocks public house is located less than 100 metres from the site’s south-eastern boundary, any future development would be designed to ensure that minimal harm would come to the character and setting of the listed building. In terms of other policy constraints, it is acknowledged that a Protected Verge runs along the site’s southern boundary. Should this be incorporated into the scheme, it is recognized that the landowner would be responsible for its management and protection. It should be noted that the site was put forward under the 2015 Call for Sites process (REF: 02Wen15), with the subsequent Site Assessment indicating that development of this land for an employment use would be favourable. In particular, the Site Assessment indicates that the site could accommodate 560m² of B1 development. Moreover, the Site Assessment concludes
--	---

	<p>that: the site is available and development is achievable subject to the protection of the special verge. The site is well located to road, bus and rail networks. The site is considered suitable as development contributes to sustainable patterns of development. In addition, the Uttlesford District Employment Land Review (Aecom, 2017) indicates that the Council should consider designating the site for B1 use class activities (see R2 under 'Recommendations'). However, upon review of the emerging Local Plan document, we are disappointed to see that the site has not been allocated for development. We therefore object to the emerging Local Plan in its current state, as no reasoning has been provided as to why the site has not been allocated for employment development, despite the fact that the site has been positively assessed by the two documents mentioned above. The site is suitable, available and viable, and could be delivered within five years. Should the Council be unsupportive of an employment allocation, we believe that the site could be alternatively allocated for residential development. It is anticipated that the site could deliver up to 24 dwellings in a highly sustainable location. (Audley End Estate; PSLP2634).</p> <ul style="list-style-type: none"> • As above paragraph 3.9: Policy SP2, and in particular point 3 of this policy, should be amended to state that: New developments in the Type A and Type B villages will be supported to help enhance or maintain the vitality of these communities with the emphasis being on: Enhancing and maintaining the distinctive character and vitality of the rural communities; and Strengthening rural enterprise and linkages between settlement and their hinterlands. (Stonebond Properties LTD; PSLP2707) • At least one more strategic allocation should be included in the plan (Chelmer Mead) (Baker & Metson; PSLP2710) • At Part 2 insert the following wording after rural area; In order to meet these objective new allocations in the form of minor extensions to some Type A villages are made to provide for modest development consistent with scale and character of the settlement. At Part 3: omit reference to Type A Villages (The Battlement Trust; PSLP2715) • More growth should be distributed amongst the 7 key villages as established sustainable communities (The Crown Estate; PSLP2744) • Delete all references to London Stansted Cambridge Corridor unless such mention clarifies that body's objectives, membership and relevance to planning matters. (PSLP641) • In the absence of clarity as to a precise threat, the general principle of countryside protection set in context of the Government's aviation policy for making best use of airports could be better reflected by the following change: "London Stansted Airport, as London's third airport, puts Without a proactive planning strategy, making best use of London Stansted Airport, could result in significant pressure for development on the surrounding countryside". (MAG; PSLP1518) • Paragraph 3.25 Change historic to heritage assets....this is the most commonly used term (see NPPF glossary). Welcome the addition of reference to sites of archaeological interest. Also suggest that Registered Parks and Gardens should be included in this list. (Historic England; PSLP1827) • Paragraph 3.83 Suggest the addition of a further bullet point to read 'conservation and enhancement of the historic environment' (Historic England; PSLP1830)
--	--

	<ul style="list-style-type: none"> • Paragraph 3.88: We suggest that this paragraph should include more detail in relation to heritage assets both on site and in the wider area and discuss appropriate treatment of these assets. This will need to be informed by the findings of the HIA. (Historic England; PSLP1837) • The North Uttlesford Site has the potential to harm the significance of Heritage Assets. (Historic England; PSLP1853) • Any development supported through improvements in rail capacity linked to Crossrail 2 should be explicitly recognised in the Uttlesford Local Plan. (TfL; PSLP2114) • Paragraph 3.48 promotes the growth tourism, including Hatfield Forest National Nature Reserve. In response to the Regulation 18 consultation the National Trust objected to the reference to Hatfield Forest in this paragraph. As previously requested, the National Trust requests that reference to Hatfield Forest is moved to the following bullet point which is concerned with protection of the environment, rather than promoting growth and capitalising on the Forest. (National Trust; PSLP2496) • However, it should be made clear that this is an estimated date, and in any event, the Housing Trajectory indicates that West of Braintree will not commence until 2025/26 so the statement is misleading. (Landsec; PSLP2616) • Paragraph 3.44. As a neighbouring authority, Hertfordshire County Council (HCC) should be included on the list of adjoining local authorities that are identified in this paragraph. (East Herts DC; PSLP2653)
<u>Policy SP3 The Scale and Distribution of Housing Development</u>	
SUPPORT	
OBJECT	
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • The plan is informed by agreement with other authorities (e.g. Braintree) and based on joint working on cross border strategic matters (PSLP785, Galliard Homes) • West of Braintree can deliver more in the plan period, we suggest between 1,400 and 1,900, with development beginning in 2022/23 (PSLP785, Galliard Homes) • The policy is positively prepared to ensure housing delivery is achieved across the District for the Plan period, and by planning for at least 14,000 net additional dwellings to meet identified needs. Policy SP3 will be effective in ensuring delivery of new housing from a number of outlets in a sustainable manner throughout the Plan period whilst also protecting retained open and protected countryside and Green Belt elsewhere in the District (PSLP1989, Andrewsfield New Settlement Consortium) • Correct removal of unsustainable new settlement proposal in Elsenham: One area that the R19 draft Plan has made progress is the removal of the previously proposed new settlement/village extension to the north east of Elsenham (PSLP2559, Residents for Uttlesford) • We support the scale and distribution of housing development which seeks to meet the housing requirement for Uttlesford during the Local Plan period of at least 14,000 net additional dwellings. This accords with paragraph 47 of the NPPF, which seeks to boost significantly the supply of housing, requiring local planning authorities “to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing (PSLP393, Grosvenor Great

	<p>Britain & Ireland)</p> <ul style="list-style-type: none"> • We support the Housing Trajectory at Appendix 3, referenced at paragraphs 3.70 to 3.72 of the supporting text to Policy SP3, which sets out the proposed delivery rate for NUGC within the Local Plan period. NUGC will provide 5,000 new dwellings, of which 1,925 will be delivered during the Local Plan period (PSLP393, Grosvenor Great Britain & Ireland) • Henham PC supports this policy. Henham PC would object to alternative development elsewhere, including further development at Elsenham (PSLP2152, Henham Parish Council) <p>Chelmsford City Council is supportive of the approach (PSLP1769, Chelmsford City Council)</p>
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • Epping Forest’s Local Plan has been subject to a number of objections. There may be questions as to whether UDC will need to consider unmet needs. • The market signals adjustment fails to take into account the worsening affordability ratio in the District, including for ‘entry level housing’. • An increase in the housing requirement is needed to create flexibility, particularly in the first five years. Suggested adjustments: 20% increase or to 16,800 net additional homes. • The housing buffer contained in the plan, just 4.28%, is not sufficient to demonstrate flexibility to account for changing circumstances over the plan period nor to deliver a significant boost to housing supply, and is therefore not compliant with the NPPF 2012 paragraphs 14 and 47. Recent appeal decisions contradict the assertion that a 5% buffer is appropriate (refs: APP/C1570/W/16/3156864; APP/C1570/W/16/3156864; APP/C1570/W/17/3168869; APP/C1570/W/16/3166101. An inspector’s note to Guilford Borough Council’s examination, states that the Liverpool methodology and a stepped trajectory are not acceptable as they negate the purpose of the 20% buffer, frustrating attempts to address affordability. (PSLP2524, Home Builders Federation) • UDC will be unable to demonstrate a five year housing land supply for a number of years in the middle part of the plan period, contrary to paragraph 47 of the NPPF • A small delay in delivery would undermine the Council’s ability to deliver and demonstrate a five year land supply • There is no justification for the stepped trajectory or the Liverpool methodology this will not support a significant boost to housing supply, nor deal with a backlog in the first five years. There are suitable sites available to deliver early in the plan period. This serves as a retrospective approach to the plan strategy and is not consistent with national policy. Furthermore the 5% buffer is not justified when the requirement of 568 homes per annum has only been met in one of the six years, and there is an existing deficit (PSLP2524, Home Builders Federation) • The stepped trajectory equates to a requirement to deliver 45% of the overall housing requirement in the first half of the Plan period, and 55% in the second half, with 34% of the overall housing requirement being delivered by the garden community allocations. Even if UDC meet their housing requirement in the first half of the Plan, they will be behind in delivering the overall housing requirement. Any delays or failure to deliver the large-scale allocations will therefore have a significant, cumulative impact on delivery of the overall requirement. This is not considered to represent a positively prepared, effective strategy

	<ul style="list-style-type: none"> • The requirement to adopt DPDs before planning approval is likely to have delays on the delivery of the Garden Communities and lead to a shortfall in supply, particularly as there has been no progress to date • There is an overreliance on the Garden Communities and the long lead in times, significant infrastructure requirements and multi-agency coordination for Garden Communities mean that they will not deliver early, and alternative sites should be considered. Furthermore, work on their planning is at a very early stage, undermining the quick delivery. In latter years the Garden Communities account for 90% of completions (PSLP2524, Home Builders Federation) • Failure to meet housing needs risks choking off the economic prosperity of the district as workers struggle to obtain housing that is within affordable reach • The Council should consider planning for the need identified in the government's standardised methodology, this will mitigate against late submission, and the plan being found unsound and boost the housing supply and provide further flexibility • The standard methodology will take effect five years after the adoption of the current Local Plan. Should housing affordability in Uttlesford worsen, this will automatically increase to correct this. As such, it is much better that the Local Plan seeks to address identified needs in full and stabilise the cost of housing now • East Cambs' Inspector attached weight to the standardised methodology, MHCLG have told Councils that they should start using the government's new standard methodology with immediate effect if they do not have an up-to-date local plan. The Council should provide robust evidence to say why they do not need to use the standard methodology • The plan is based on growth estimates that do not take into account the impact of the UK leaving the EU • Type A and Type B villages are expected to provide just 134 dwellings, despite Type A villages being identified at Paragraph 3.38 of the DLP for a scale of development that reinforces their role as a local centre and supports their vitality. The DLP should ensure a proportionate level of growth for these settlements by allocating suitable sustainable and deliverable sites • Market towns, in particular Saffron Walden and Great Dunmow have good services and facilities and are well placed to take more development that would support the services and facilities in the towns • The concerns expressed by the NEA inspector have an immediate effect on the deliverability of West of Braintree, as well as the other two Garden Communities, the plan should not rely upon it • The issues identified by the NEA are applicable in Uttlesford • SLP3 makes provision for 1,120 homes on windfall sites, a far greater proportion than that through an opportunity to provide for properly planned allocations for the Villages, this abdicates decision making and does not allow for proper infrastructure planning. The availability of brownfield sites in the district is low and this rate is not justified • Paragraph 68 of the NPPF 2018 identifies that small and medium sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly • Simply because East Herts has used a particular market signals uplift does not mean it is appropriate for Uttlesford • There is a discrepancy between the stepped trajectory in SP3 and Appendix 3.
--	--

	<p>705dpa should be applied consistently in the latter part of the plan period</p> <ul style="list-style-type: none"> • The Garden Communities will not be able to deliver over 250 plus units a year for a sustained period. The Lichfields report on large sites indicates 160 dpa or 100 dpa is a more realistic build out rate • This housing land supply falls well short of the five year requirement that needs to be demonstrate as a minimum in accordance with the Framework. This indicates there is a clear need for extra housing to come forward early in the Plan, in the order of an additional 1,000 dwellings, in order to ‘close the gap’ in the housing land supply and ensure the Government’s objective of significantly boosting the supply of homes is met • All key villages and type A are subject to an arbitrary and unjustified cap, this should be removed to allow each site to be treated on its merits • The plan is not justified having regard to reasonable alternatives • The SHMA, upon which the housing requirement is based, is not transparent and provides no audit trail • The SHMA area ignores potentially greater influences from Braintree (workers commuting to Stansted) and Cambridge (a destination for Uttlesford workers) • The period used to determine housing growth in the SHMA includes a period of exceptional population growth, distorting the OAHN • Growth assumptions for Stansted Airport are overstated and double counted • There is a circularity around homes being uplifted to balance with jobs and jobs being uplifted to balance with homes • The is an over-simplistic approach to migration • The rationale for the employment trends review is not easy to follow but appear to uplift growth to a “Stansted Trajectory” • The comparator districts for the market signals review do not compare will with the rural districts in the SHMA. Also considering the lower quartile prices has introduced an unjustified bias into the SHMA • The 20% market signals uplift is simplistic and “random” • The basis for the growth split between the four authorities in the SHMA area is not explained and disproportionately puts growth in Uttlesford • The SHMA has not been properly scrutinised by an independent reviewer • The treatment of concealed households and homeless households creates a bias to increase household growth • People in communal establishments are double counted • The rounding up of 13,880 to 14,629 is not justified • The two sites Els1 and Els2 are contrary to the Inspector into the 2014 Local Plan’s advice • The housing supply does not take into account Carver Barracks • Inadequate emphasis on affordable housing on exception sites • UDC is taking far too much growth and more growth than its fair share, exacerbating the north-south divide, and not focussing on those most in need in our district • Low cost accommodation can be provided by freeing up empty homes and second homes, by conversions and renovations. There are approx. 750 in UDC, 220 unoccupied for 6 months or more, and 545 unoccupied properties in Cambridge. One in 10 adults own a second home, while four in 10 adults own no property at all • The OAN is not NPPF compliant because: it rejects the official projections preferring longer term trends without clear justification (contrary to para 2a-017-20140306 of the PPG); the recent affordability adjustment from 20% to
--	--

	<p>13.7% is not justified, 25-30% would be more appropriate; the assessment of affordable housing need excludes large groups likely to be in need; furthermore, an uplift of the OAN should be considered to better meet affordable housing needs</p> <ul style="list-style-type: none"> • Simultaneously bringing forward two to three Garden Communities is not realistic, both the Lichfield Review and NEA examination support this view. The coordination of infrastructure provision, particularly large-scale transport infrastructure further complicates this • An OAN of 900 dpa is more appropriate • Both Easton Park and West of Braintree require the construction of a rapid transit system. Very little work has been done to establish the feasibility and deliverability of this • The lack of differentiation between the trajectories for Easton Park and North Uttlesford is not in line with advice from the NEA examination or the Kerslake Review • Any slippage in the delivery of Garden Communities will remove considerable numbers from the plan period • The Lichfields report indicates that planning approval for large sites can take 5.3-6.9 years. This would imply planning applications for Easton Park and North Uttlesford needed to be submitted by 2017/18 to see delivery in 2022/23 • The SHMA does not consider suppressed household formation amongst younger people • To address affordability issues an uplift of 60% on household projections would be appropriate • London overspill has not been addressed • The deliverability of Woodside Way in Great Dunmow is question • The growth in the Local Plan is disproportionate to past growth • The housing requirement should be a minimum, and the plan should seek to deliver significantly more homes to mitigate against delay and lack of delivery on sites • Government guidance suggests 10-20% of residential permissions will not be implemented and 15-20% of permissions will lapse and suffer delays (PSLP2524, Home Builders Federation) • The infrastructure cannot cope with the level of growth proposed • Elsenham has too much development, ELS1 should not be allocated (PSLP314, Elsenham Parish Council) • The calculation for communal establishments is not shown anywhere (PSLP314, Elsenham Parish Council) • Placing housing in the north of the district, when the jobs are in the south is not sustainable • There has not been proper consultation with the Cambridgeshire authorities, who have already planned to meet the housing and job needs • Uttlesford has on average a delivery rate of 48 dpa on all sites, sites of 500+ dwellings are built out 27% slower than average; the trajectory is overly optimistic • The housing requirement is too high due to incorrect projections of job growth at Stansted Airport and too high population growth estimates • 1,560 dwellings not already completed fall within the Hatfield Forest Winter Zone of Influence, smaller sites should seek to provide open space, recreational land and green infrastructure to mitigate the impacts of people
--	--

	<p>visiting Hatfield Forest. Similarly the delivery of a large scale country park is needed</p> <ul style="list-style-type: none"> • A pro-active windfall strategy is required to ensure delivery across the plan period • The strategy far exceeds the OAN for housing in Uttlesford, the figure of 13,332 from the SHMA 2017 should be used • Proposing three Garden Communities is too ambitious • Need for spaces in care homes should not be amalgamated with ordinary housing need, care home figures are not in the housing supply calculations • The housing requirement is too high and not based on the latest government projections (2016-based household projections) • The plan seeks to meet the housing needs of Cambridge & South Cambridgeshire • The failure of the plan to meet the needs early puts significant pressure on meeting the Housing Delivery Test • The strategy does not reflect the current development pattern and population distribution • Felsted has sufficient facilities to be classified as a key village as opposed to a Type A village and additional land should be allocated (in addition to the proposed allocations) • The market signals uplift is inadequate and will not address affordability in the district • Experience of delivery at Cambourne indicates a the delivery rate on Garden Communities should not exceed 239 dpa • Hatfield Heath is a key village without any allocated growth, this will erode services, local businesses and the community • The housing requirement in the Local Plan differs from the requirement in the Infrastructure Delivery Plan • Saffron Walden has too much development proposed within it given the constraints of the updated transport study and air quality issues (PSLP2217, Weareresidents.org) • Little or no duty to cooperate with Braintree District Council • Little or no duty to cooperate with South Cambs District Council <p>The North Essex Inspector also raised the point that the assessment of the chosen spatial strategy against alternatives that do not include garden communities had generally made optimistic assumptions about the benefits of garden communities, and correspondingly negative assumptions about the alternatives, without evidence to support many of those assumptions.</p> <p>As a result, the Inspector’s letter stated, "these assessments lack the necessary degree of objectivity and are therefore unreliable". Appendix 5 of the Uttlesford Regulation 19 Sustainability Appraisal makes the comparison between “traditional approaches” vs new “garden communities”. Whilst it is appreciated that this is a somewhat theoretical assessment, it would appear that this is written to give the impression that garden communities are a much more preferable option. For every criterion “garden communities” score better than “traditional approaches”, which simply cannot be the case if an objective view is taken. The assessment scores new settlements a “+” and traditional approaches “?” for encouraging sustainable patterns of development which does not appear to be fair, when existing infrastructure and services will be in place in existing</p>
--	--

<p>settlements and in garden communities everything is starting from scratch and likely to be phased. Also In relation to providing appropriate housing and accommodation to meet existing and future needs, again new settlements are scored as a “++” whereas traditional approaches only a “+”. What the assessment of this criteria clearly fails to consider is issues such as meeting needs where they arise or preventing households breaking up and having to move away to satisfy their housing needs, which must form a key social component of the assessment criteria.</p> <p>There are a number of instances which question the objectivity of this assessment, which have knock on effects for the remainder of the assessment of the Strategic Options and needs to be reassessed more objectively.</p> <p>4.1 The site is assessed under reference THA4 of the emerging Plan’s Sustainability Appraisal (SA) and the conclusions are largely positive.</p> <p>4.2 The site is anticipated to have significant positive impacts on criteria relating to Groundwater Source Protection Zones, Green Belt, Countryside Protection Zones, ancient woodlands, minerals and waste facilities, public safety zones associated with Stansted Airport proximity to public transport, community facilities, delivering affordable housing and avoiding the loss of employment land.</p> <p>4.3 Positive impacts are identified in relation to the sustainability criteria for the conservation and enhancement of biodiversity, retention of TPOs, historic lanes, pollution, flood risk, cycleways and footpaths, proximity to shopping and a secondary school, PRoWs or bridleways, delivering a suitable housing mix, utilities connectivity and capacity in a nearby secondary school.</p> <p>4.4 A number of comments are made in response to the assessment scores:</p> <ul style="list-style-type: none">● The SA identifies a significant negative effect for proximity of water bodies, which is attributed when a water body is on the site according to the assessment pro forma. There is no water body on the site, the nearest being the stream within the existing hedgerow on the southeastern border. The Site Location Plan in Appendix 1 confirms this does not fall within the site.● The SA awards a negative score for the site’s moderate to high sensitivity to change taken from UDC’s HSCA. As discussed in the SHLAA critique, this assessment does not include a site-specific assessment and the evidence accompanying these representations confirms the site is entirely deliverable with minimal impact. <p>Additionally, a number of other sites, including allocated sites, score negatively against this criterion and therefore sites cannot be ruled out for this reason without compromising the ability of the emerging Plan to deliver the required amount of housing.</p> <ul style="list-style-type: none">● As greenfield land, the site is considered to have significant negative impacts with regards to prioritising the development of brownfield land ahead of greenfield. The lack of available brownfield land to meet housing need requires greenfield land to be allocated. Indeed, the vast majority of sites put forward for consideration are greenfield and limiting development on this basis would fail to
--

deliver sufficient housing to meet local needs. In delivery terms greenfield land is superior to brownfield, with development able to begin without the delay of any demolition or remediation works required which is integral to addressing the lack of a 5-year housing land supply in Uttlesford.

- Negative scores are identified for the site's location outside but adjacent to the settlement boundary and the presence of grade 2 agricultural value of the land as existing. Almost all other sites put forward, with the exception of one, scored negatively or significantly negatively against these criteria meaning the site is one of the better performing options despite receiving a negative score. Sites should not be discounted on this basis as the emerging Plan would be unable to deliver sufficient housing to meet identified need in this location.

- The SA anticipates a negative impact on heritage assets from development of the site but acknowledges that mitigation is possible. The accompanying site-specific evidence confirms that any impact of development on heritage assets would result in the lower end of the less than substantial harm definition and the capacity for mitigation means the site should not be viewed negatively in this respect.

- A negative score is awarded against flood risk, with the assessment locating the site within Flood Zone 2. This is inaccurate, as the site is entirely within Flood Zone 1. The site should be attributed a significant positive score.

- Negative scores are awarded against criteria for proximity to GP services and a primary school as well as the quality of the potential site access. An appeal decision on Land off Walden Road¹ confirmed the sustainability of the village including accessibility to a wide range of services inline with Thaxted's role as a Key Village. This is discussed further in section 3 below. Access to the site is perfectly achievable through the existing development to the north and the supporting highways note confirms this. The site should therefore not be scored negatively against any of these criteria.

- The SA identifies a negative score against the Accessible Natural Greenspace Standard. All other sites in Thaxted scored the same or worse, including two allocated sites that scored significant negatives. In site selection terms, the site performs well against this criterion compared with alternative sites.

- A significant negative score is provided against the recreational space criterion, which suggests development of the site is expected to result in a loss of recreational space. This is an incorrect assumption as the site is agricultural land is not currently used for recreation.

- The assessment scores the site uncertain for the proposed density of development. The illustrative layout demonstrates that the proposals would sit comfortably within the site and development would seek to align with UDC's density policy as required. This score should be positive for the site.

- Primary school capacity is identified as an issue within the assessment, as is the case for a number of other sites including two allocated sites. Site selection should therefore not be based on the capacity of primary schools otherwise it would not be possible to allocate sufficient sites to meet housing need.

	<ul style="list-style-type: none"> ● The site is marked negatively for the distance to main employment areas, along with every other site in Thaxted. Discounting sites for allocation based on this criterion would mean housing need would be unmet in the village. ● Linden Homes requests that the Sustainability Appraisal supporting the emerging Plan is updated to reflect these comments and the evidence presented to support them. (Linden Homes; PSLP2789, PSLP1576, PSLP1574)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> ● It is considered that Policy SP3 should be modified to increase the housing requirement to provide for at least 16,800 homes in the Plan period to meet objectively assessed needs. ● Various modifications sought amendments to the number of dwellings in different towns and villages, often with specific site proposals linked to these changes. ● West of Braintree Garden Community should be deleted from the listed locations, and other reasonable alternative locations added or increased in capacity (PSLP2216, Stebbing Parish Council) ● It is considered that the Plan should identify a range of smaller and medium sized sites across the borough that can come forward expediently and early on into the plan period, to address a front loaded need ● The plan should use the Sedgefield method in line with the PPG ● The housing land supply should be recalculated based upon a flat rate of 636 dwellings per annum, addressing shortfall in the first five years of the Plan period, and applying a 20% buffer ● Various representations sought the allocation of additional sites to close a perceived gap in supply in the early / middle years of the plan. ● UDC should reconsider their SHLAA site assessments and identify additional suitable small and medium sites that can be allocated in the Local Plan that can be built out quickly. ● The trajectory must demonstrate delivery of a total of at least 4,567 dwellings over the first five years of the plan period, comprising 636 dwellings per annum, plus the shortfall accrued since the start of the Plan period and allowing for a buffer of 20% for persistent under delivery. ● The trajectory should include a windfall allowance of 50 dpa, rather than 70dpa. ● Remove ELS1 & ELS2. Take fully into account Carver Barracks ● Adopt an OAN which is no lower than 680 dwellings per annum; remove the stepped trajectory to meet need early in the plan period; allocate sites to meet this early need in existing villages. ● The Council needs to allocate additional sites to ensure the Plan provides an adequate provision of housing delivery within the first five years of the Plan ● The Council should not seek to artificially accelerate plan preparation and instead seeks to meet its standardised methodology figure ● It is suggested that the Uttlesford Plan also caps delivery rates on the Garden Communities at 250 dwellings per annum (125 at West of Braintree) – albeit this would still be optimistic and relies upon continually strong market conditions. ● A requirement in excess of 800 dpa is more reasonable in light of the very high housing pressures in the district ● If the requirement remains 14,000, a supply of at least 15,400 should be identified to allow for a greater contingency

	<ul style="list-style-type: none"> • The housing trajectory should be amended to reflect realistic delivery times • The Council should meet a rolling 5 year supply across the period and apply the Sedgfield method • Establish delivery models for the Garden Communities • Reflect uncertainty of delivery on the Garden Communities • Better understand infrastructure requirements; • The housing requirement should be increased and a buffer of at least 20% allocation (PSLP2524, Home Builders Federation) • Clarify the source for 504 communal establishments (PSLP314, Elsenham Parish Council) • A moratorium on further consents in Saffron Walden should be put in place until air quality and traffic studies and assessments have been carried out and publically reported upon • Felsted has sufficient facilities to be classified as a key village as opposed to a Type A village and additional land should be allocated (in addition to the proposed allocations) • A market signals uplift of 25% to 30% would be justified to improve housing affordability and should be reviewed in the evidence base.
Policy SP4 The Provision of Jobs	
SUPPORT	4
OBJECT	14
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • We support the provision of a minimum net increase of 14,000 new jobs in the Local Plan period, maintaining a broad balance between homes and jobs and maintaining a diverse economic base. (Grosvenor; PSLP945) • We strongly support paragraph 3.76, which states that the preferred scenario growth option is the most appropriate growth to plan for as it balances jobs growth with growth in homes, in line with the evidence from the West Essex and East Hertfordshire Assessment of Employment Needs. This supports the provision of 16,000 jobs over the Local Plan period. (Savills UK; PSLP2738) • We support paragraph Policy SP 4 - Provision of Jobs which sets an ambitious target to ensure, provision will be made for a minimum net increase of 14,000 jobs in the period 2011-2033 to maintain a broad balance between homes and jobs and to maintain a diverse economic base. We note paragraph 3.76 which states that the B use class jobs (offices, industrial and warehouses) will provide around 10% of the overall jobs growth in the District over the Local Plan Period. (PSLP2550) •
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • By not providing for a minimum net increase of 16,000 jobs, the Plan conflicts with paragraph 16 of the revised NPPF, which states that plans should be prepared positively. We therefore object to Policy SP4. (Savills UK; PSLP2738) • A Substantial portion (over 30%) of the housing development planned up to 2033 is in NUGC an area where no evidence is given of comparable job growth. The majority of the job growth information explicitly refers to other parts of the district. (PSLP308) • The forecast of future jobs on the Stansted Airport planning Application: UTT/18/0460/FUL is foreseen as being lower than that expressed on the reg19 local plan. (Stop Stansted Expansion; PSLP361) • The justification/explanatory text for Policy SP 4 states the evidence shows 16,000 jobs over the Plan Period is achievable, yet the policy states

	<p>14,000 jobs, with no explanation why lower. (Essex County Council; PSLP874)</p> <ul style="list-style-type: none"> • Continuing lack of B1 (c) and B8 accommodation or land. (PSLP1801) • B1 B2 and B8 land at North Stansted Employment Area wholly within the control of MAG. There are a number of physical and legal constraints. (PSLP1801) • Quick turnaround at other B1, B2 & B8 Sites highlights the illustrates the clear demand and lack of alternative sites in Uttlesford. (PSLP1801) • It does not make sufficient provision for employment land. The Council is placing undue reliance therefore, on a single source of employment land allocated, which is entirely controlled by a third-party land owner, with competing interests in terms of their operational requirements. This monopoly on the availability of employment land is clearly not healthy in maintaining a competitive local economy The respondent is of the view that the employment policies and allocations set out in the Regulation 19 Pre -Submission Plan, singularly fail to deliver the Councils aspirations or adequately provide for the Districts employment land needs for the life of the Plan. PSLP (Pomery Plannning; PSLP1802) • We note Policy SP4 but note that no detail is given as to where the proposed jobs will actually be provided and we are not aware of any supporting documents identifying their location. It is not obvious what purpose SP4 serves without further detail. Additionally, from a sustainability perspective jobs are expected to be provided near new homes, so we would expect the policy to reflect this. (We Are Residents; PSLP2218) • 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. The target of an additional 11,000 jobs over the period of the plan simply perpetuates the existing reliance on out-commuting. (Littlebury Parish Council, PSLP2402) • Statistics from the ONS indicate that the Councils housing requirement has not been based on a sound assessment of housing needs in the Housing Market Area. This is due to the fact that the proposed adjustment of 14% to take into account market signals has failed to address the worsening affordability ratio in the District, which rose from 6.95 in 2001 to 14.75 in 2017. This suggests that an uplift of at least 20% to the housing target is required in order for housing need to be met across the plan period. (Audley End Estate; PSLP2641) • Object to Draft Policy SP4 on the basis that it does not agree that the suggested minimum net increase of 14,000 is sound as it is not positively prepared. FFE question if the 14,000 figure properly reflects the opportunity for growth at London Stansted Airport (LSA) during the plan period. Similarly, on the basis that the Council has underestimated the potential for growth at LSA its approach to determining interrelated housing need associated with jobs growth during the plan period (given that the Council aims to maintain a broad balance between homes and jobs) also does not fully take account of economic growth at LSA. (Fairfield Elsenham; PSLP2781)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Change Paragraph 3.76 to include: Provision will be made for a minimum net increase of 14,000 jobs net increase of 16,000 jobs in the period 2011-2033 to maintain a broad balance between homes and jobs and to

	<p>maintain a diverse economic base. (Savills UK; PSLP2738)</p> <ul style="list-style-type: none"> • Policy SP 4 be amended to provide clarity on the number of new jobs that are to be delivered as part of the garden communities given 75% of the planned housing growth is being directed to these new settlements. Policy SP4 should also be amended to provide clarity on the number of jobs that are expected to be delivered from b class uses and non b class uses. (Carter Jonas; PSLP832) • Clarification of job numbers • Policy SP4 should be amended in order to reflect the required 20% uplift to the housing target outlined in Policy SP3. For example, the policy could read: Provision will be made for a minimum net increase of 16,800 jobs in the period 2011-2033 to maintain a broad balance between homes and jobs to maintain a diverse economic base. Such an amendment would therefore require further employment allocations to be made in the District, in order to ensure that enough jobs are created across the plan period. (Audley End Estate; PSLP2641) • The Council should reevaluate the potential for economic and employment growth at London Stansted Airport (LSA) and should adjust the provision for jobs growth proposed. (Fairfield, Elsenham; PSLP 2781)
<u>Policy SP5 Garden Community Principles</u>	
SUPPORT	3
OBJECT	34
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Reference is made to the proposed development plan documents 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 Waters water recycling infrastructure which is required to serve new development. (Anglian Water; PSLP878) • Following our comments on the previous regulation 18 consultation, this policy has been reworked and now includes a list of the TCPA garden communities principles which the Council welcomes. The overall policy aligns with the Braintree ambition to create holistically planned new communities underpinned by a comprehensive package of infrastructure. (Braintree District Council; PSLP2057) • We support Policy SP5 which proposes the delivery of three new garden communities in Uttlesford, including NUGC. We support the inclusion of the Town and County Planning Association’s (TCPA) Garden City principles that seek to deliver high quality new garden communities. 4.2 This accords with the NPPF at paragraph 52 which states that: “the supply of new homes can sometimes be best achieved through planning for larger scale developments such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities 4.3 This is further reflected in the NPPF (2018) at paragraph 72. (Grosvenor; PSLP947) • Policy SP5 (Garden Community Principles) is sound. Policy SP5 is positively prepared to ensure that high quality new garden communities, including the West of Braintree Garden Community, are delivered to meet garden city principles defined by the Town & Country Planning Association. The development vision and master plan submitted by Andrewsfield New Settlement Consortium (ANSC) in May 2015 towards the Council Call for Sites made absolutely clear the commitment that ANSC has made towards creation of a Garden Community following the principles set out at Policy

	<p>SP5. A copy of the ANSC development vision and master plan for the WBGC is enclosed with these representations. The scale and form of development proposed for the WBGC is fully justified within the robust evidence base prepared by UDC and also within the site specific evidence prepared and submitted by ANSC (copy enclosed). Policy SP5 will be effective due to, in the case of the WBGC, a small number of landowners who are committed and willing to see delivery of a new development meeting each of the Garden Community development principles. Policy SP5 is also effective as the policy recognises that there are a range of different delivery models that can be effective in implementing the Garden Communities. Policy SP5 is consistent with national policy ensuring that growth is Plan led and adheres to the guiding principle of achieving sustainable forms of development that meets the needs of the present without compromising the ability of future generations to meet their own needs. (Andrewsfield Consortium; PSLP1992)</p>
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • Proposal presents a risk to housing delivery and is therefore not effective. A delay in the delivery of one of the garden communities will have significant implications for delivery rates and the associated 5YLS. (PSLP185) • Additional allocations should be made to ensure that there is sufficient land identified for housing to maintain delivery during changing economic circumstances (PSLP185) • The first principle is Land value capture for the benefit of the community. But it is not clear as to how this works. There is a need to explain who pays what to whom and how and when. It should be further explained how this value benefits the community. A series of worked examples is needed. (PSLP382) • There is no reference at all to creating multi-user routes, just a scant reference to walking and cycling in point 8. This is at odds with the stated Garden Community Principles, point 9 at Appendix 4, (being an integral part of the Plan), which does correctly state the requirement for such routes to cater for all users, including equestrians. (Essex Bridleways Association; PSLP398) • We welcome the commitment (para. 7) to enhance the natural environment, provide comprehensive green infrastructure networks and achieve net biodiversity gains alongside the development of the garden communities. However, the precise wording of this policy does not accurately reflect national planning policy guidance. (Essex Wildlife Trust PSLP829) • With regards to self-containment and alignment with TCPA Guide Notes, surrounding non-car uses, The Local Plan should make clear the aspirations that will help to deliver sustainable Garden Communities particularly the required change in mode share to facilitate self-containment, and better reflect NPPF and guidance in this regard. (Essex County Council; PSLP875) • all three proposals are over-ambitious and there is considerable doubt as to whether the WoBGC can be justified and deliverable, given that it is wholly dependent upon the larger Braintree GC that is now in considerable doubt, having been found to be unsound in the North Essex Strategic Section 1 Plan. (Bloor homes; PSLP900)

	<ul style="list-style-type: none"> • Further clarity required on the definition of affordable housing TCPA principles vs Regulation 19 local plan (PSLP1042) • Policies do not address the historic environment. (Historic England; PSLP1832) • Lack of a DPD (Chase New Homes; PLSLP2190) • In regards to the West of Braintree Garden Community, We consider that the necessary evidence to justify that a Garden Community in this location is either deliverable or appropriate. (We are Residents; PSLP2226) • We note the reference in this policy to the garden city principles espoused by the Town and Country Planning Association. These do not form part of any formal Government guidance. The policy sets out a number of considerations which may be desirable but are not necessarily easily achievable, if at all. Planning, in a generic sense, and town and country planning in particular, are about the anticipation of future requirements and how these can best be met. However, the long-term future is sufficiently uncertain to make planning for it extremely difficult (Eclipse Planning)PSLP2281) • The three new settlements providing much of the new housing are to be developed in accordance with Garden Community principles, with several options being set it as to how this will be achieved. We consider this is most likely to be successful if an SPV focussed on the long term outcomes is established 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. (Littlebury Parish Council PSLP2406) • The plan purports to follow Garden City Principles to make it look reasonable but then ignores them in all but headings. The NUGV proposal bears no resemblance to the vision at the back - community ownership, spacious, no private sector for 20 years etc. (Wendens Ambo Parish Council; PSLP 2438) • Only one new country park is proposed in the local plan. (National Trust; PSLP 2486) • Missing financial models: There are no financial models for the proposed new settlements, meaning that they may be unviable. Considering high proportion of new homes proposed for new settlements, the financial viability should be modelled in the core local plan and not deferred to DPDs. (Residents for Uttlesford; PLSP2595) • All three schemes carry a risk of coalescence with neaby settlements (PSLP2654) • Assessment of SHMA unsound and will lead to a shortfall of supply . • Commitment falls short in building NUGC in accordance with Garden City Principles as defined by the TCPA(Ickleton Parish Council, PSLP2700) • Concern at the scale, complexity and development requirements of the new Garden Communities are such the delivery may be questionable. The Plan may contain unrealistic expectations for the delivery of neww housing on such developments. (Gladman Associates; PSLP2794) • The proximity of the three garden communities to each other (within 20 miles) and also within the two other garden communities proposed within Braintree / Colchester / Tendering, is of particular concern. As proposed, a total of five new garden communities, with a total new population of c. 140,0003, are planned along only a 25-mile of the A120. Together with the
--	--

	<p>existing communities at Great Dunmow, Braintree and Colchester, along with a multitude of smaller settlements, a substantial proportion of housing growth in north Essex is proposed to be developed within a relatively small geographic area, but with the infrastructure necessary to support it still hanging in the balance and not yet committed. (PSLP2869)</p> <ul style="list-style-type: none"> • No DPD means a lack of clarity on the delivery model (Taylor Wimpey; PSLP2881) • Policy SP5 mentions land value capture for the benefit of the community. This has generally been very poor in the past in the northern part of Uttlesford. (PSLP2931) • Objects to NUGC on grounds that alternatives have not been adequately considered. (Wellcome Trust; PSLP2976) •
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Policy SP5, third paragraph. ECC reiterates its comment contained within our 2017 response, that the third paragraph of Policy SP 5 should include the word landscape. This will be important in terms of the provision of green space, landscape elements and the landscape setting of the new communities; these elements being particularly important in terms of implementing the Garden City principles referred to at the beginning of Policy SP 5. To omit any reference to landscape could imply the lack of a desire to ensure that good landscape design is an over-riding principle to underpin the master planning for the proposed development allocations. (Essex County Council; PSLP877) • Last paragraph. It should be made clear that the DPD will secure both housing and employment. Whilst housing is given as an example the provision of employment is seen as crucial for the success of the garden communities. The garden communities are not just about housing delivery but also the provision of jobs. This is reflected in the Local Plan itself and the TCPA garden city principles as reflected in Appendix 4 of the Draft Local Plan. (Essex County Council ; PSLP879) • Amendment to paragraph 3.83: Options for the extent of the boundary developable area will be considered as part of the preparation of the Garden Community DPDs but will include: 4.9 In summary we support Policy SP5 subject to the inclusion of the above amendments to the Policy and supporting text.(Grosvenor; PSLP947) • In drafting your principles for the development of new garden communities, we would suggest that you ensure that reference is made to the need to conserve and enhance the historic environment in line with the NPPF.(PSLP1832) • Therefore we consider that this wording should be amended to allow Outline Planning Applications to be progressed ahead of the DPDs, where these are delayed, or failing or in addition to this, to allow the DPDs and Outline Planning Applications to be worked up and submitted in parallel, if desired by the applicant and the LPA, and to assist in meeting the Councils housing delivery requirements. Policy SP5 also refers to there being a delivery model for each Garden Community. Although there may well be possibilities for its use, the reference is unclear in its ambit and needs to be much more clearly articulated in the plan so that discussions can be efficiently conducted. (Barton Wilmore for Landsec; PSLP 2605) • In order to make this policy sound, the Plan must include a timeframe by which the development plans for each of the Village Communities should be prepared in order to make it effective (Taylor Wimpey; PSLP2881)

	<ul style="list-style-type: none"> • SP5 should insist that the District Council, the planners and Parish Councils ensure that reasonable value is captured for the benefit of the community. Typically in the form of infrastructure, services and facilities such as village halls and recreation. (PSLP2931) • Additional Allocations should be made to ensure that there is sufficient land identified for housing to maintain delivery through changing economic circumstances. i.e. The Land South of Beldams Lane, Bishops Stortford. (Bloomhall ; PLSP185) • Include a clearer explanation of land value capture including working examples. (PLSLP382) • Amend SP5 to include all users. (PSLP398) • Amend SP5 to read as follows; provide comprehensive green infrastructure and coherent ecological networks achieve measurable net biodiversity gains (Essex Wildlife Trust; PSLP398) • Amend to include: “The new communities will be planned around a step change in integrated and sustainable transport systems that put walking, cycling and rapid transit networks and connections at the heart of growth in the area, encouraging and incentivising more sustainable active travel patterns” (Essex County Council; PSLP 875) • Amend 3rd Paragraph to read: 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. (Essex County Council; PSLP877) • Amend last sentence to include "employment" as follows and read: The criteria will be designed to ensure, for example, that the development will meet garden city principles and will secure the delivery of housing and employment throughout market cycles. (Essex County Council; PSLP879) • In drafting your principles for the development of new garden communities, we would suggest that you ensure that reference is made to the need to conserve and enhance the historic environment inline with the NPPF. (Historic England; PSLP1832) • Therefore we consider that this wording should be amended to allow Outline Planning Applications to be progressed ahead of the DPDs, where these are delayed, or failing or in addition to this, to allow the DPDs and Outline Planning Applications to be worked up and submitted in parallel, if desired by the applicant and the LPA, and to assist in meeting the Councils housing delivery requirements. Policy SP5 also refers to there being a delivery model for each Garden Community. Although there may well be possibilities for its use, the reference is unclear in its ambit and needs to be much more clearly articulated in the plan so that discussions can be efficiently conducted. (Landsec; PSLP2605) • An alternative spatial strategy and distribution of housing, with an evidence base that demonstrates the deliverability of that strategy. (Trustees of N Streeter Will Trust; PSLP 2869) • Must include a timeframe for the DPD’s (Taylor Wimpey; PSLP2881) • SP5 should insist that the District Council, the planners and Parish Councils ensure that reasonable value is captured for the benefit of the community. Typically in the form of infrastructure, services and facilities such as village halls and recreation. (PSLP 2931) •
--	--

Policy SP6 Easton Park Garden Community	
SUPPORT	12
OBJECT	543
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Waste Water: We are pleased to see statements that the first part of Water Cycle Study has identified that there are technical solutions for foul water flows for the garden communities. However a statement about protecting water quality and that there are options for meeting the challenging targets required, should also be added. Due to the high percentage of WRCs that are located at river headwaters with limited dilution capacity we expect part two of the Water Cycle Study to address the challenges of permitting for extensions or changes to WRCs (PSLP996, Environment Agency) • Flood Risk: We support the text within the utilities section that the communities will 'provide Sustainable Urban Drainage systems to provide water quality, amenity and ecological benefits as well as flood risk reduction (PSLP996, Environment Agency) • We welcome the preservation of historic sites but believe greater care should be taken of those in the Little Easton proposal (PSLP1641, Birchanger Parish Council)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • The site at Easton Park has consistently been judged by UDC as unsuitable, going as far back as 1993, and as recently as 2014 (PSLP2379, Great Dunmow Town Council) • Lack of sustainable transport options (PSLP2379, Great Dunmow Town Council; PSLP2346, Little Easton Parish Council) • A single access to serve 1,925 homes in the plan period is substantially in excess of accepted national guidelines for a maximum of 400 homes to be served from a single access point. It will be the biggest cul-de-sac in Essex. (PSLP2379, Great Dunmow Town Council; PSLP2346, Little Easton Parish Council; PSLP1740, Great Easton & Tilty Parish Council) • It is noted within the Council's Infrastructure Development Plan (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." • A single access point will have implications for emergency access. • There are significant uncertainties due to the lack of evidence of testing of any other route and so SP6 relies on road capacity assessments that have not been properly carried out (PSLP2379, Great Dunmow Town Council) • The transport evidence base by not considering rerouting due to congestion is not compliant with the NPPF and does not properly assess the proposal (PSLP2379, Great Dunmow Town Council) • Not consistent with the NPPF paragraphs 17, 32, 157, 162 and 177. Increased use of the private car cannot be avoided and the site cannot be made sustainable by introduction of a regular bus service (PSLP2379, Great Dunmow Town Council; PSLP2346, Little Easton Parish Council) • Our transport evidence shows that there will be capacity issues on the A120 trunk road and flows diverting onto untested local roads (PSLP2379, Great Dunmow Town Council; PSLP2346, Little Easton Parish Council) • The cumulative impact of development on the A120 and Junction 8 of the M11 will be unacceptable (PSLP2379, Great Dunmow Town Council; PSLP2311, CPREssex; PSLP2346, Little Easton Parish Council) • There is a paucity of public transport routes that serve the site, and the site relies on the delivery of a North Essex wide Rapid Transit system. However,

	<p>the recent letter from the EiP Inspector Roger Clews into that plan dated 8th June 2018 gives rise to substantial questions over the delivery of this essential infrastructure to make the Easton Park site sustainable by reducing the reliance on the private car. (PSLP2379, Great Dunmow Town Council; PSLP2311, CPREssex)</p> <ul style="list-style-type: none"> • Our landscape report from Helen Thompson demonstrates that housing growth on the SP6 Site will give rise to a significant loss of valuable countryside, harm to the nearby ancient woodlands (including High Wood SSSI) and wildlife habitats, as well as loss of high- grade agricultural land (PSLP2379, Great Dunmow Town Council; PSLP2311, CPREssex; PSLP1740, Great Easton & Tilty Parish Council) • The infill of housing will result in the loss of a valued strategic gap between the market town of Great Dunmow and neighbouring villages important to prevent coalescing, and therefore contravenes the Great Dunmow Neighbourhood Plan and is not consistent with national policy on Garden Villages (PSLP2379, Great Dunmow Town Council; PSLP2311, CPREssex; PSLP2346, Little Easton Parish Council) • There is potential for substantial harm to Stone Hall (grade II* listed) (PSLP2379, Great Dunmow Town Council) • There is heritage harm at the higher end of less than substantial spectrum to other heritage assets including the Water Tower, Easton Lodge and Gardens and the Little Easton Conservation Area (PSLP2379, Great Dunmow Town Council) • Group harm would affect designated and undesignated assets, to properties in the surrounding villages and market towns which were properties of the original Countess of Warwick Estate (PSLP2379, Great Dunmow Town Council) • This site is the former Deer Park of the Easton Lodge Estate and provides the wider setting of the Lodge and the boundaries. It informs the significance and historic inter-relationship with the majority of the other heritage assets in the locality (PSLP2379, Great Dunmow Town Council) • Due to the extant working quarry on the SP6 Site, housing in the plan period is forced to the north west of the Site, which is two miles from the main road access (PSLP2379, Great Dunmow Town Council; PSLP2311, CPREssex) • The existing Roman high-status villa site to the west conflicts with access routes (PSLP2379, Great Dunmow Town Council) • The setting of heritage assets to the north and south are to be protected (PSLP2379, Great Dunmow Town Council) • SSSI High Wood to the east of the SP6 Site is to be protected (PSLP2379, Great Dunmow Town Council) • Stansted Airport countryside protection zone abuts the western boundary of the Site (PSLP2379, Great Dunmow Town Council) • Policy SP6 specifically recognises that road connectivity to the north is constrained because existing local rural roads are unsuitable for the volume of new traffic which will arise (PSLP2379, Great Dunmow Town Council) • The early phase housing location exacerbates harm to landscape and to the setting of heritage assets (PSLP2379, Great Dunmow Town Council) • The sites proximity to Stansted Airport is a constraint with airport noise and potential harm to the health and wellbeing of new residents (PSLP2379, Great Dunmow Town Council; PSLP2311, CPREssex; PSLP2346, Little Easton Parish Council) • Easton Park will have significant negative impacts on Great Dunmow including
--	--

	<p>overdevelopment; loss of character; coalescence (PSLP2379, Great Dunmow Town Council)</p> <ul style="list-style-type: none"> • Easton Park will cause coalescence with Little Easton resulting in a loss of identity (PSLP2379, Great Dunmow Town Council; PSLP2311, CPREssex) • Easton Park will cause development sprawl from Stansted Airport to Great Dunmow (PSLP2379, Great Dunmow Town Council; PSLP1740, Great Easton & Tilty Parish Council) • There is a history of poor housing delivery in Great Dunmow and there is a lack of evidence in the plan that there will be sufficient demand to deliver 5,000 homes in the Dunmow area in the plan period (this figure is derived from the 3,000 consented but yet to be built in Great Dunmow at the same time as SP6 is expected to deliver 1,925 homes. This demonstrates an ineffective housing distribution across the district for housing delivery to 2033 (PSLP2379, Great Dunmow Town Council) • Carver Barracks will become available towards the end of the plan period and will be able to deliver faster than Easton Park on less valuable land (PSLP2379, Great Dunmow Town Council; PSLP2346, Little Easton Parish Council) • Policy SP6 fails to outline vital supporting infrastructure for the first phase of development (PSLP2379, Great Dunmow Town Council; PSLP1740, Great Easton & Tilty Parish Council) • The local infrastructure cannot cope with a new town here. • Policy SP6 provides no requirement for on-site employment during the plan period (PSLP2379, Great Dunmow Town Council) • Not supported by Sustainability Appraisal process, which was insufficient and inadequate. The way alternative sites were considered was flawed. The SA process relied on insufficient and inadequate information. The selection of Easton Park is not supported by the evidence. (PSLP2379, Great Dunmow Town Council) • The area in the promotor's masterplan south of the A120 for associated employment land is approximately two miles from where homes can be built near Easton Lodge, with proposed access via a farm bridge with limited weight capacity and it is not in LS's ownership. If the access proves unsuitable, the aim of keeping journeys within the site will not be achieved and will impact sustainability (PSLP2379, Great Dunmow Town Council) • Easton Park cannot be developed to Garden City Principles (PSLP2379, Great Dunmow Town Council) • In early phases Easton Park, before services and facilities are in place, will place significant pressure on Great Dunmow (PSLP2379, Great Dunmow Town Council) • The policy should require the adoption of a SPD / DPD Masterplan to guide the development in the plan period which should be annexed to the local plan policy. The Masterplan needs to address broad areas of growth, new road access and buffering areas, and identify heritage and landscape mitigation measures to inform housing growth. Heritage buffering measures and the outline of the proposed Country Park and mitigation land should be shown on the Masterplan, along with ancient woodland protection (PSLP2379, Great Dunmow Town Council) • The policy should require the transfer of the mitigation land to safeguard a gap to reduce coalescence, which would require in SP6 that the site refused for 700 homes West of Great Dunmow will not be developed and draft Heads of Terms should be drawn up so that the transfer can be formalised at the
--	--

	<p>point when the plan is approved (PSLP2379, Great Dunmow Town Council)</p> <ul style="list-style-type: none"> • The policy should make clear that there will be no airport-related use of the employment land at Easton Park (as this would conflict with UDC airport policy) and this must be written into the policy (PSLP2379, Great Dunmow Town Council) • The policy should require an additional access junction with the A120 to address traffic impacts and the necessary development infrastructure should be brought forward and resourced by the Garden Community Management Company (PSLP2379, Great Dunmow Town Council) • The policy should require that a regular dedicated direct bus link be provided between Great Dunmow, the new community and Stansted Airport (PSLP2379, Great Dunmow Town Council) • The policy should require existing road improvements and a new car park should be provided within Great Dunmow so that Easton Park residents will have access to services and amenities in the town (PSLP2379, Great Dunmow Town Council) • Development is not required as sufficient sites are already allocated. • A new rail line is a daydream. • Development will be meeting London’s needs. • Development here will make the area ‘outer London’. • Great Dunmow will be dwarfed by this development and the High St will suffer. • Our pleasant green land will be totally obliterated. • Development will badly affect our wildlife. • Development here will cause air pollution. • Development here will affect our carbon footprint. • Loss of beautiful, tranquil area. • Impact on quality of life of nearby communities. • The roads cannot cope with excess traffic from the development. • The area has enough development already. • The local roads are too narrow. • Hospital and Dr waiting lists are too long already. • Schools are already oversubscribed. • I am also very concerned about how there will be adequate water supply for the area with this volume of housing. • Only one access road will never work. • The site boundary includes ancient woodland. Your own policy within this plan indicates that ancient woodland is an irreplaceable habitat and that development affecting it should usually be refused. Since we wrote our previous letter, the NPPF has been amended to indicate that ancient woodland should only be lost to development in wholly exceptional circumstances. Whilst the new NPPF is not yet fully in force, it is a clear indication of Government's desire to see ancient woodland given the highest possible level of protection (PSLP818, the Woodland Trust) • This is a new town in the Green Belt. • This plan is solely for rich developers to build buy-to-let houses to sell to other rich individuals to let to transient airport workers at high rents. • There is no reference to the creation of multi-user routes within this new community in accordance with the stated Garden Community Principles. Any links created to the Flitch Way, which is a definitive bridleway, should also carry the same definitive status. It is noted that point 10 aspires to ‘enhance
--	--

	<p>the existing public rights of way network’ but this gives no clue as to whether access for all is included within this aspiration (PSLP625, Fritch Way Action Group)</p> <ul style="list-style-type: none"> • The identity of Great Dunmow as an ancient market town would be lost forever. • The uncertainty due to Brexit and Climate Change mean this is the wrong time to develop here. • The area around Dunmow is taking the biggest share of development. • The development will mean that the privately owned part of the Gardens of Easton Lodge will no longer be accessible to the public. • The development will destroy the setting of the Gardens of Easton Lodge. • There is no evidence that Easton Park will provide one job per home, as the Garden Community Principles require. Stansted Airport will not provide the necessary jobs. • Increasing journeys made by bicycle is not realistic as bikes are not allowed on the A120, and traffic on the B1256 will discourage anyone but the most experienced cyclist. • The rapid transit system to Stansted Airport will merely serve to make the new town one huge car park for workers at the airport and those travelling from it – exacerbating the existing fly-parking problem that the area already has to endure. Furthermore, such a transit system would inevitably pass through the village of Broxton where the local, single track, roads are entirely unsuited for such traffic. • With no local jobs many residents of the new town will wish to travel to London or Cambridge by train. Bishop’s Stortford station has neither the car parking facility or capacity on the trains to accept such a huge increase in potential passengers. Neither have Stansted Mountfitchet or Elsenham, the two next nearest stations. • A town this far south in the District will supply migrants from London, not provide the type of housing local people want...i.e. dispersed around the villages. • The location/estate proposed is over 10 miles, straight line distance from the nearest A&E, risking poor outcomes from major trauma, stroke, cardiac arrest and head injuries (see The Golden Hour/Time) and will increase pressures on The East of England Ambulance Service. Attending to routine appointments at hospital clinics will be difficult due to the lack of public transport, more tiring and expensive due to this distance and will place unnecessary pressure on hospital and volunteer transport services. Visiting will be more difficult for elderly partners/relatives for the same reasons. • There is no train station locally. • If there were a path it is too far to be practical to walk to Stansted Airport Station from Easton Park for anyone with time constraints. Stansted Airport has the most expensive season ticket of the local stations. • One secondary school is not enough, parents want choice, many will not use the nearest state school for personal, religious reasons etc. • The site is already a treasured area for walking/ trail running/horse riding etc and within a triangular area between three SSSI and the location of habitat for several red grade endangered birds and other rare wildlife mentioned in The Uttlesford and Essex Biodiversity Action Plan. • Hatfield Forest which is now over used and suffering damage due to the insensitive, exponential housing growth in Takeley bring excessive numbers of
--	---

	<p>new visitors into the locality.</p> <ul style="list-style-type: none"> • Highways England interest with the proposal is with the potential impact on the Strategic Road Network (SRN) and its ability to be able to operate safely and efficiently with the proposals in place. In particular, our interest relates to the M11 and A120. Highways England have been heavily involved in the transport evidence base and support the enhancement to public transport and sustainable mode offer across the district and practically for the garden village developments. It will be essential for all development, and in particular for the garden villages, that housing comes forward along with schools, Drs Surgery's, other health care provision, shops, jobs, public transport and other infrastructure as the demand arises (PSLP3026, Highways England) • The Garden Community promoters proposed significantly higher delivery rates, which would have delivered approximately double the number of homes allocated to Easton Park Garden Communities within the plan period. We continue to be interested to understand the justification for this delivery rate assumption and whether a higher rate could be achieved that would undermine the need for three Garden Communities. • It has not yet been demonstrated that the Garden Communities allocations – either for the Local Plan period or in full – are deliverable, that their impacts can be properly mitigated, or that the assumptions surrounding self-containment are achievable. • In order to conclude that the Garden Communities are viable, the Economic Viability Study (June 2018) states that it relies on indicative phasing assumptions set out in the Infrastructure Delivery Plan (IDP)4. However, it is clear from a detailed review of the IDP that it does not identify definitive timings or thresholds for the delivery of infrastructure. (The phrase “it will be for the masterplan process to establish when [x] will be delivered” is used frequently). It is therefore not yet clear how the Viability Study can be relied upon to evidence the viability – and therefore the deliverability – of the Garden Communities. • It remains unclear whether the proposed delivery rates would allow for the development of a critical mass that would facilitate sufficient developer contributions to fund their associated infrastructure requirements. At present, UDC does not have a Community Infrastructure Levy (CIL) charging regime in place and, therefore, it is possible that pooling restrictions on the collection of Section 106 contributions could act as a further constraint to the funding of necessary infrastructure requirements. • A Rapid Transit System that terminated at Stansted would not achieve a significant modal shift. • The modal shift expectations are unrealistic (PSLP2346, Little Easton Parish Council) • No evidence that local people will be able to afford the homes at Easton Park. • It is vital that the proposed Garden Towns, which as a concept I support, have good access to major roads and motorways. In the south one can only presume that the this will be to the A120 but one cannot go far on that road without meeting disruption caused by poor links to other roads, including itself west of Birchanger and to the east, east of Braintree. In the north links to the M11 and routes to Cambridge and Newmarket must be accessible but here again these roads are already close to carrying maximum traffic. • Easton Park cannot rely on jobs at Stansted Airport, as other residential developments have already relied upon them. • The NEA Inspector's concerns around the evidence supporting the Rapid
--	--

	<p>Transit System for their Garden Communities, equally applies to Easton Park.</p> <ul style="list-style-type: none"> • If the DPDs are adopted by the end of 2019, the earliest a planning application could likely be submitted would be the end of 2021. Assuming a determination period of 12 months, the application wouldn't be approved until the end of 2022. This is a conservative estimate and timescales could well be elongated. The level of infrastructure required for such large scale developments before construction of dwellings can even begin is significant and as such, it would be highly unlikely that dwellings would start to be completed by 2022/23. The delivery of 100 units from garden villages in 2022/23 therefore seems highly unlikely and has implications for the whole housing trajectory for the latter 10 years of the Local Plan period. • Research by Lichfields in 2016 shows the timescales of 15 garden villages from first identification through to planning approval. All three of UDC's garden villages are at the top of the range examined by Lichfields in terms of housing numbers and far exceed 2,000 units. The Lichfields evidence suggests that the timescales for obtaining planning approval on a site of this size is likely to be in excess of four years. Therefore the timescales indicated by UDC in their Local Plan seem even more unlikely. Again this points towards why significantly more housing is required from additional allocated sites in the early part of the plan period. • In 1937 the Countess of Warwick designated Easton Park as a nature reserve and sought to ensure this survived through an agreement signed in 1939 with the District Rural Council of Dunmow to limit development within the Park to ten dwelling houses. This agreement remains extant. • The policy relates to the provision of a new garden community at Easton Park which would provide 10,000 new dwellings in total with a minimum of 1,925 of these being provided during the plan period to 2033. Thames Water have been liaising with the Council and Environment Agency in relation to the wastewater infrastructure requirements for the site and have been co-operating with the production of a Water Cycle Study for the wider area. There are a range of options for delivering wastewater infrastructure that is likely to be necessary to accommodate the development at Easton Park and within the wider area which are being reviewed to establish the most appropriate approach (PSLP2583, Thames Water) • Anglian Water as sewerage undertaker is generally supportive of the requirements relating to foul and surface water drainage as outlined in Policy SP6 relating to Easton Park Garden Community. However the wording relating to the requirements for foul drainage and sewage treatment appears to be duplicated in first and second sentences of paragraph 18 of the policy and should be amended to ensure it is effective (PSLP2513, Anglian Water) • East Herts Council queries the effectiveness of reference to rapid transit measures to Stansted Airport in Policy SP6 (Easton Park), Policy SP11 (London Stansted Airport) and TA4 (New Transport Infrastructure or Measures). While East Herts Council supports this in principle, as it would increase options for sustainable access to the airport and nearby settlements, such measures are not addressed in the current planning application for the expansion of the airport to accommodate up to 43 million passengers per annum. The application is likely to be determined in advance of the adoption of the Local Plan and therefore such ambitions may be prejudiced by the determination of the application in advance of any formal endorsement of rapid transit networks by either Essex or Hertfordshire County Councils in their role as Highway Authorities (PSLP2500, East Hertfordshire District Council)
--	---

	<ul style="list-style-type: none"> • The NEA Inspector has found that the proposed West of Braintree New Community is not deliverable primarily because the financial plan is not viable. In that approximately 15% of the UDC plan relies on this joint community then at this time the housing numbers required in the UDC Plan cannot be delivered in the plan period. • UDC has failed to consider altogether the financial viability of its plan; hence the financial viability of the proposed New Community at Easton Park cannot be demonstrated to be financially viable. • UDC defers too much detail to the DPDs. • A proposal for a major expansion of Stansted Airport will have major transport implications and yet there has been no integrated consideration of the cumulative effects. Without such a consideration no Plan can be considered sound (PSLP1740, Great Easton & Tilty Parish Council). • I object to a last—minute addition of a large tract of land to the south of the B1256 which has been designated as land for industrial use. There has been a lack of transparency, ethicality, possibly legality and certainly democracy. • The B1256 forms a natural boundary to development happening on the north side of the A120. • Young people will not be able to afford homes in the new town without assistance from their parents. • Loss of greenfield land. • This is an area of low rainfall and water shortage. • This application will join Little Easton with Dunmow, thus losing its village status, and the important buffer zone between them. • Any second runway would be very close to the new town. • Easton Park and West of Braintree: Policies SP6 and 8I am disappointed that again the bulk of the new development proposed in the Draft Local Plan is 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 and there is already more development in Dunmow that has been approved but not yet built. • Development will affect bridleways and riding amenity land for equestrian and other rural pursuits. • The Council is required by the NPPF to take account of Government policy on airports in the development of Local Plans. Therefore, in order to achieve a sound plan, 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 & west of Braintree proposed allocations. Furthermore, the Civil Aviation Authority (CAA) is currently consulting (until 10 September 2018) on a 'Draft Airspace Modernisation Strategy' which will replace the existing 2011 'Future Airspace Strategy' and provide a co-ordinated strategy and plan for the use of UK airspace for air navigation up to 2040: a final version is due towards the end of 2018. (PSLP1527, Manchester Airports Group) • The vision for Garden Cities does not align with the Easton Park development proposal. Ebenezer Howard, a had vision to create: 'a utopian city in which people live harmoniously together with nature'. Garden Cities were to avoid the downfalls of industrial cities such as urban poverty, overcrowding, low wages, dirty alleys with no drainage, poorly ventilated houses, toxic substances, dust, carbon gases, infectious disease and lack of interaction with nature. It proposed the creation of new suburban towns of limited size,
--	--

	<p>planned in advance, and surrounded by a permanent belt of agricultural land.</p> <ul style="list-style-type: none"> • This area is very close to the Highwoods, Dunmow SSSI (Site of Specific Scientific Interest) and the need to prevent negative impacts should be explicitly recognised in this policy and supporting text (PSLP891, Essex County Council) • ECC is supportive of bullet points 4, 5 and 6. However, there should also be consideration of connectivity to these green and open spaces, allotments and recreational facilities to ensure that access to green spaces is as easy as possible. Connectivity of green spaces can help to enhance recreational experience and opportunities, especially if there are footpaths or cycleways between them (PSLP883, Essex County Council) • It is recommended that the Policies SP 6, SP 7 and SP 8 include employment floorspace allocations and/or employment land requirements; a point made by the Planning Inspector to the North Essex Authorities when he reported on their Section 1 Local Plans (letter issued 8 June 2018) (PSLP880, Essex County Council) • The impact of a new town of 25,000 people on Great Dunmow has not been properly calculated or considered. • The Easton Park garden community relies heavily on the proposed dualling of the A120 to the east of Braintree. This dualling has not yet been committed to by Highways England – a point highlighted in the Inspector’s comments on the Section 1 North Essex Authorities (‘NEAs’) emerging Local Plan (see Appendix 2): “36.In addition, a decision has yet to be made on the alignment for the dualled A120. The alternative alignments still being considered have quite different implications for the A120’s relationship with CBBGC • An instructive local example to understanding how long Rapid Transit System can take to develop is the Greater Cambridge City Deal (GCCD) which, since its inception in 2015, has been working up several low-level public transport interventions around Cambridge including bus priority routes and a traditional busway (i.e. non-guided). This has been with substantial financial support from Central Government totalling £100m. It is now the latter half of 2018 and although there has been great deal of technical and consultation work, it is unlikely that these relatively minor interventions will be delivered before 2020. The Rapid Transit route is a more significant intervention than those which the GCCD is exploring – particularly if it involves light rail or busways – and would likely take significantly longer to plan and deliver. • Development here will result in 5 new towns along the A120 corridor within a 20 mile radius. • How will Land Value Capture be achieved? This is not clear. • The DPD should consider opportunities for appropriate scale development and linkages between these areas (Stansted Airport, the A120 / M11 junction and corridor) are considered as part of this process. • Strategic Growth DPDs are referred to in Policies SP6 (Easton Park), SP7 (North Uttlesford) and SP8 (West of Braintree). However, these are not explained anywhere else in the document. It is unclear whether these are the DPDs to be produced for each of the Garden Communities as referred to in 3.82 and SP5. Assuming this to be the case, for clarity the terminology used throughout the plan should be amended so it is consistent (PSLP2608, Landsec) • At point 3, the plan sets out the facilities required to be provided within the Garden Community. We are unclear of the basis for the specific requirements listed, as any requirements will need to be assessed as part of planning application process, and as the development progresses. For example, if the
--	---

	<p>development ultimately provides significantly less than 10,000 units, it may not be appropriate to deliver seven primary schools. The actual number of schools will be determined using pupil/product ratios at the time of granting planning permission/delivery of the scheme. Therefore we do not consider it is appropriate for the Local Plan to be specific in terms of the number of schools. Instead we consider that schools should be treated as per the other facilities listed, where it is simply confirmed that these will be included in the Garden Community (PSLP2608, Landsec)</p> <ul style="list-style-type: none"> • While Landsec supports the provision of a direct sustainable link from Easton Park to Stansted and from Easton Park to Woodside Way, neither is essential for delivery of a sustainable Garden Community at Easton Park (PSLP2608, Landsec) • Point 25 refers to the potential to use of compulsory purchase powers to facilitate delivery of the Easton Park Garden Community, where this cannot be achieved by agreement. It is unclear what agreement the policy refers to, and the circumstances in which this policy might take effect. If it is linked to the determination of the appropriate delivery model, as referred to in Policy SP5, we consider this should be removed from the plan, as it is not a land-use planning matter, or better defined in line with our comments above (PSLP2608, Landsec) • The primary concern is that the proposed garden community will cause significant harm to the valued landscape, ancient woodlands and the setting of Easton Park Estate and Little Easton Conservation Area. In fact it would impact adversely on all the surrounding villages which are inextricably linked with the history and identity of this unique area (PSLP2311, CPREssex) • We support the continued designation of the Countryside Protection Zone around Stansted Airport but are concerned about its future value given that Policy SP6 is proposing a development of 10k new homes on land which is physically contiguous (ie on the other bank of the River Roding) with that of the CPZ. It appears somewhat paradoxical to uphold the CPZ concept “to protect the rural character of the countryside and prevent changes to the rural settlement pattern of the area” on one hand but then propose a huge new settlement directly abutting the eastern boundary of the zone (PSLP2311, CPREssex) • The development is within the likely zone of influence for potential air quality impacts, through increased traffic levels, to Epping Forest SSSI, SAC, Hatfield Forest SSSI, High Wood Dunmow and Elsenham Woods SSSI. The policy must recognise this and include a requirement for implementation of any measures identified as necessary, through the Epping Forest SAC Mitigation Strategy, or other appropriate strategy for addressing air quality impacts on SSSI’s The policy should specify a funding mechanism for the delivery of the agreed measures (PSLP2453, Natural England) • The development is also within the ZoI for recreational impacts to Hatfield Forest SSSI, as identified through the National Trust Visitor Impact and Access Management study, discussed above. This should be acknowledged within Policy SP6 and a requirement included for development to provide a contribution toward implementation of appropriate mitigation measures - identified through the National Trust study as necessary to address the adverse effects of increased recreational pressure. The Council will need to agree the specific measures / level of funding required to deliver these through this, and other relevant development in the district, with the National Trust and Natural England. For Easton Park Garden Community this is likely to
--	---

	<p>include delivery of a Country Park as specified in point 6 of the policy. The policy should specify a funding mechanism for delivery of the agreed measures (PSLP2453, Natural England)</p> <ul style="list-style-type: none"> • A development of this scale should include a requirement to deliver landscape-scale net biodiversity gain in accordance with paragraphs 20, 170, 174 and 175 of the NPPF and the aspirations of the recently published Defra 25 Year Environment Plan. This should be cross-referenced with a requirement for the development to make a positive contribution to the Essex Living Landscape initiative, through appropriate habitat creation and enhancements (PSLP2453, Natural England) • The policy should also promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity, in accordance with paragraph 174 of the NPPF (PSLP2453, Natural England) • Natural England advises that the allocation site is likely to comprise a considerable amount of agricultural land, some of which may be classified as 'best and most versatile' (BMV) agricultural land (Grades 1, 2 and 3a land in the Agricultural Land Classification (ALC) system). The policy should include explicit requirements for development to protect BMV land in accordance with paragraph 170 of the NPPF (PSLP2453, Natural England) • At the closest point the Easton Park site lies at JUST 285 metres from the extended Great Dunmow so cannot be seen as separate or anything other than an extension of Great Dunmow. • Currently Great Dunmow has circa 2,000 homes consented but not yet built which will put further strain of current services and infrastructure without the addition of Easton Park. • The development is too big. • Easton Park will increase run-off leading to flooding of existing communities. • The proposal for three garden communities presents a risk to housing delivery and therefore is not effective. A delay in the delivery of one of the garden communities will have significant implications for delivery rates and the associated five year housing land supply and therefore additional allocations should be made to ensure that there is sufficient land identified for housing to maintain delivery during changing economic circumstances. • Criterion 4 is not consistent with the content of policy INF2 (the general policy that covers sports facility provision in new development) which has been revised between the draft and pre-submission versions. Policy INF2 requires new development to make indoor and outdoor sports provision in accordance with the most up-to-date Sports Strategy which is supported by Sport England and considered to be sound in terms of compliance with the NPPF and the CIL Regulations. However, criterion (4) of Policy SP6 requires sports facilities to be provided in this development line with standards established in the Local Plan which is inconsistent. This is likely to cause confusion about how provision for sports facilities should be made in this development and which policy takes precedence (PSLP63, Sport England) • This development will, in essence, become a dormitory location for people employed in London, Harlow, Bishop's Stortford, Saffron Walden or Cambridge (PSLP2403, Thaxted Parish Council) • It is indicated that it would be serviced by an access point at the major junction on the A120 adjacent to Highwood Quarry. The theory presumably is that the A120 would be used to link to the M11 going either north or south. In
--	---

	<p>reality however, given the congested nature of the two-lane M11 northbound, commuters and other traffic destined for Saffron Walden or Cambridge is more likely to take the short-cut via the Tesco roundabout and the new Woodlands link road to the B184 and through Thaxted (PSLP2403, Thaxted Parish Council)</p> <ul style="list-style-type: none"> • We support this proposal in principle, but on the basis of a much more rapid rate of development than the Local Plan implies, in order to build a critical mass sooner rather than later, ensure or at least encourage the earlier provision of services and facilities, and remove the uncertainty about the eventual size of the development in the very long term. • Beware of unexploded buried bombs from 2nd world war!! • The policy as written does not fully reflect NPPF para 174 which requires LPAs to “promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity (PSLP830, Essex Wildlife Trust) • The B1256 cannot cope with extra traffic. • The policy should be amended to mention equestrian access. Including providing new routes, protecting existing routes. Any links to the Flitch Way should be definitive bridleways. • The separate identities of Little Canfield and Takeley have prejudicially not been included in this statement. There are concerns about coalescence with Little Canfield. Traffic flows from Easton Park will affect Takeley (PSLP2352, Takeley Parish Council) • Compulsory Purchase Orders should not form part of the strategic planning in the Local Plan (PSLP2352, Takeley Parish Council) • Connections to the Flitch Way could have a very detrimental effect on Hatfield Forest (PSLP2352, Takeley Parish Council) • Concern over DPDs being issued after the plan is adopted. Detail and infrastructure needs to be known in advance (PSLP2344, Takeley Parish Council) • The exact nature and scale of the contribution and subsequent expenditure by the NHS body responsible at that time, will be calculated as and when schemes come forward over the plan period to realise the objectives of the Local Plan. Anticipated impact: New Primary Healthcare facility essential. Great Dunmow is being considered for options to provide multi-service facility. (PSLP2581, West Essex CCG) • Major adverse harm to heritage assets and the loss of identity of the Little Easton Conservation Area (PSLP2346, Little Easton Parish Council) • Adverse harm to landscape areas of high sensitivity (PSLP2346, Little Easton Parish Council) • The proposals divide the village of Little Easton and cut off access for 25 residential properties to the rest of the village (PSLP2346, Little Easton Parish Council) • Phasing of development to the north will worsen the harm to the most sensitive areas of landscape and settings of heritage assets (PSLP2346, Little Easton Parish Council) • The presence of a restrictive covenant on 660 acres of land at Easton Lodge, specifically set up to prevent development of the land, is a risk to plan delivery as it could deter potential developers from coming forward or delay delivery of the housing numbers through future legal action by residents (PSLP2346,
--	--

	<p>Little Easton Parish Council)</p> <ul style="list-style-type: none"> • The process should identify suitable sites for a new town rather than rely on developer submissions. • An agreement signed between the Rural District Council of Dunmow and the executors of the Countess of Warwick in 1939 limits development on Easton Park to ten dwelling houses. This agreement remains extant and UDC as the successor local authority remains bound by it. • The potential for slippage in the housing trajectories is significant. • By only meeting top-up shopping needs the development is unsustainable. • There are significant concerns regarding the development at such close proximity to the gardens of 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. Further encroachments into the setting of the HAR registered park and garden and its associated listed buildings would further erode its significance and relationship with its surroundings, and could potentially limit opportunities to re-establish links between the disparate elements of the former Easton Park Estate. (PSLP1835, Historic England) • The boundary of the Little Easton Conservation Area is particularly defined by a line of trees which sits within the currently open landscape and there is concern that the impact of the proposed development upon the conservation area would be severe. There is similar concern over potential impacts to the significance of the setting of the registered park and garden (views across countryside to the north). The open nature of the landscape is of value as it serves to inform the character of nearby listed buildings, the registered garden and the conservation area (PSLP1835, Historic England) •
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Amending the proposed Garden Park proposals ensure that the ancient woodland within it is protected and given adequate buffering from any surrounding housing or other development (PSLP818, the Woodland Trust) • To make this Plan sound, we ask that this Policy is amended to include all users and therefore be consistent with the stated Garden Community Principles at Appendix 4, and that ALL new routes are created as multi-user routes accessible to all vulnerable road users including equestrians and the disabled, rather than the default option which tends to only cater for pedestrians and cyclists. It is simply not acceptable to discriminate against one user group when public money is being used to create such infrastructure (PSLP625, Flich Way Action Group) • In this year that commemorates 100 years since the end of The Great War wouldn't it be wonderful if Uttlesford District Council could work with the landowners to set aside the land as a commemorative forest? I have seen Brown Hare, Badgers, Lapwing, Barn Owl, Yellowhammer, Skylarks and hedgehogs in the area, to name but few and on the ground there are orchids. I would like to propose that the area of land designated as land to build Easton Park, which will cover about the area of Hatfield Forest, be set aside for the people of Uttlesford to enjoy as it is or improved for wildlife. • Easton Park should be removed from the Local Plan. • There should be no new housing at Easton Park, but rather that Easton Park should be developed as the nature reserve intended by the Countess with increased access for the public.

	<ul style="list-style-type: none"> • Section 21 of the policy relates to wastewater infrastructure requirements. Given the changes to the approach to the delivery of water and wastewater infrastructure that came into effect in April 2018 it is considered that Section 21 of Policy SP6 should be revised to read: “Ensure that no phase of development is occupied until any necessary upgrades of the Enhance the appropriate water recycling centre have been delivered together with any necessary sewerage network reinforcement works., informed by the Uttlesford Water Cycle Study. The delivery of smart, innovative and sustainable water efficiency/re-use solutions that fosters climate resilience and a 21st century approach towards water supply. Developers will be expected to engage with wastewater infrastructure providers to agree an phasing and infrastructure delivery plan to ensure any Provision of improvements to waste water treatment and off-site drainage improvements are aligned with the phasing of the development within the plan period and that proposed post 2033.” (PSLP2583, Thames Water) • To be effective it is suggested that the first and second sentences of paragraph 21 of the policy relating to foul drainage should be brought together to make it clear what is the requirement for the applicant and the decision maker at the planning application stage for both the foul sewerage network and receiving Water Recycling Centre. As current drafted the wording appears to overlap the requirement to demonstrate that there is sufficient capacity available in time to serve the development (PSLP2513, Anglian Water) • In respect of aerodrome safeguarding matters, given the issue is a repeated risk across a number of elements, it is considered that an overarching caveat is inserted into the introductory paragraphs of the main policy text. For example: “The Strategic Growth Development Plan Document will set out the nature and form of the new community. The DPD will be produced in consultation with stakeholders and will include a concept plan showing the disposition and quantity of future land-uses, and give three-dimensional indication of the urban design and landscape parameters which will be incorporated into any future planning applications; together with a phasing and implementation strategy which sets out how the rate of development will be linked to the necessary social and physical infrastructure to ensure that the respective phases of the development do not come forward until the necessary infrastructure has been secured. The DPD, and any future planning applications, will also demonstrate how aerodrome safeguarding considerations have been incorporated into the overall design of the new garden community to ensure that any development does not impact upon the safe and efficient operation of aircraft at or in the vicinity of London Stansted Airport” (PSLP1507, Manchester Airport Group) • Change Policy SP 6 to take account of the SSSI Impact Risk Zones. There should also be recognition of the appropriate buffer zone identified and established in collaboration with Natural England. This SSSI must remain connected with other areas of habitat (PSLP891, Essex County Council) • Policy SP 6 refers to rapid transit priority measures. The recommended amendment refers to the need to provide the physical infrastructure for rapid transit within the new communities and wider afield. Consequently, amend ‘measures’ to ‘networks and connections’ as this form of wording is most appropriate to context and purpose (PSLP890, Essex County Council) • Policy SP6 bullet point 17 Change bullet points to read: “Enhance wider green infrastructure and networks including its maintenance,
--	--

	<p>as well as the maintenance and enhancement of existing watercourses, ponds and lakes within the site.”</p> <p>Include an additional bullet point as follows:</p> <p>“Demonstrate the environmental net gains, and where there is a net loss from the development to provide provisions through offsetting.” (PSLP886, Essex County Council)</p> <ul style="list-style-type: none"> • Change Policy SP 6 by adding the following as an additional point or an amendment to a relevant bullet point: “Provide linkage of green infrastructure to the wider public realm to create green corridors and to improve accessibility for all and develop new links, utilising other components of urban greening.” (PSLP883, Essex County Council) <p>UDC should provide appropriate clarification on this matter in the Draft Plan before submission; and employment floorspace allocations and/or employment land requirements included in Policies SP 6, SP 7 and SP 8 (PSLP880, Essex County Council)</p> <ul style="list-style-type: none"> • Delivery timescales should also be reviewed to allow a more realistic programme for the DPDs and the necessary development management processes to take place; one might expect a start around 2025 to be more realistic. • It is requested that Policy SP6 is amended to make clear that opportunities for strategic growth or complementary uses will also be considered on adjoining or wider land areas such as our client’s land. This may for example include scope for linkages between the community and Stansted Airport, aiding sustainable development and providing opportunities for further social, economic and environmental benefits. • Policy SP6, Paragraph 7: "Incorporate from the early stage of the development of the garden community a package of measures to provide transport choice, including good connectivity to Stansted Airport and Great Dunmow. This should be provided by means of high quality and frequent bus services or may alternatively include a direct, dedicated link between Easton Park and Stansted Airport and between Easton Park and Woodside Way. A network of direct, safe walking and cycling routes to enhance permeability.....“ (PSLP2608, Landsec) • In relation to Point 9 we do not consider that any contributions are valid to A120 improvements, as the Transport Study states that the A120 is not in need of improvement in this location. Therefore this requirement should be removed from the policy. Further details on this point are provided below under the IDP heading. Reference to contributions to M11 Junction 8 should be expanded to confirm that any requirement for contributions will be in accordance with the CIL regulations or the regulations current at the appropriate time (PSLP2608, Landsec) • Also in relation to Point 9, while Landsec fully supports the protection of existing residents along Park Road, the access strategy for Park Road is yet to be fully designed. As there may be short sections where some Easton Park traffic uses short sections of Park Road, we request that the wording is amended as following: “Access to Park Road will be managed so that motor vehicles from the Garden Community do not pass through existing communities on Park Road” (PSLP2608, Landsec) • Point 25 refers to the potential to use of compulsory purchase powers to facilitate delivery of the Easton Park Garden Community, where this cannot be achieved by agreement. It is unclear what agreement the policy refers to, and
--	--

	<p>the circumstances in which this policy might take effect. If it is linked to the determination of the appropriate delivery model, as referred to in Policy SP5, we consider this should be removed from the plan, as it is not a land-use planning matter, or better defined in line with our comments above (PSLP2608, Landsec)</p> <ul style="list-style-type: none"> • Paragraph 3.86 of the supporting text, states that in addition to producing a DPD for Easton Park, a local economic strategy will be established. It is unclear the purpose of the strategy, how it will relate to the DPD, the content, and the timing for its production. This should be clarified in the plan (PSLP2608, Landsec) • Additional allocations, should be included in the Local Plan to help ensure that delivery is maintained through a wider distribution of sustainable sites across the district. • Criterion (4) should be amended along the following lines: Provide allotments, open space, sports facilities, play, leisure and recreation in line with the most up-to-date Sports Strategy, standards established in the Local Plan, the Essex Design Guide and the Strategic Growth Development Plan Document (PSLP63, Sport England) • Thaxted Parish Council would also insist that as a preventative measure weight restrictions be imposed on the B184 through Thaxted preventing large delivery and construction vehicles from using this route (PSLP2403, Thaxted Parish Council) • It would however be very much more sensible in our opinion, to develop new housing on the sites that were proposed under the ‘Call for Sites’ around Birchanger. Here traffic would be almost bound to use the motorway routes. (PSLP2403, Thaxted Parish Council) • Thaxted Parish Council are asking for protection against the traffic impacts in relation to the Proposed Eastern Park Development by making the road junction such as that the traffic can only go on to the A120. (PSLP2403, Thaxted Parish Council) • The policy should include a clear commitment to the provision of coherent ecological networks and to the delivery of measurable net gains in biodiversity (PSLP830, Essex Wildlife Trust) • All new routes should be multi-modal, including for equestrians. • We suggest the addition of the words “a round” or “up to” before 10,00 homes (PSLP1835, Historic England) • We consider there may be further work needed to tighten the policy wording and to more accurately reflect the outcome of the HIA once it is finalised. In the mean time we offer the following comments: (11) delete “substantially”; insert “and its setting” after Lodge. (13b) include assets grade II* Easton Glebe and Stone Hall. (13b and 14) Re-order / reword to avoid repetition. (14) Delete “close to the site”. (15) Should this number be here? (PSLP1835, Historic England) • We continue to suggest the inclusion of a concept / strategy diagram to illustrate the main features of the policy. Including access points, location of heritage assets, buffer zones for heritage assets, strategic planting and other key considerations (PSLP1835, Historic England)
Policy SP7 North Uttlesford Garden Community	
SUPPORT	35
OBJECT	698
SUMMARY OF	<ul style="list-style-type: none"> • Interest in potential impact on Strategic Road Network especially the

<p>REPRESENTATIONS IN SUPPORT</p>	<p>M11/A120. Highways England heavily involved in the transport evidence base and support enhancement to public transport/sustainable mode offer across the district and the garden village developments. Essential for all development especially garden villages housing comes forward along with schools, Surgery's, other health care provision, shops, jobs, public transport and other infrastructure as demand arises (PSLP3027 Highways England)</p> <ul style="list-style-type: none"> • Support the text on flood risk within the utilities section that the communities will provide Sustainable Urban Drainage systems to provide water quality, amenity and ecological benefits as well as flood risk reduction (PSLP2921 Environment Agency) • Husband works in Great Chesterford, but due to house prices have had to move away from the area/want to move back and be around friends again. • Welcome new infrastructure proposed as the schools are all over subscribed and a new school would ease pressure/bring more jobs to the area. Support the green garden town approach introduced to your plans. • Better than multiple housing estates popping up around the area without the above infrastructure and green areas laid out • Helps future generations to stay within the area instead of being forced out due to lack of affordable housing, jobs etc.
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • Criterion (4) broadly welcomed for ensuring that adequate provision is made for community sports facilities but not consistent with the content of policy INF2 - most up-to-date Sports Strategy but (4) requires sports facilities to be provided in line with standards established in the Local Plan (PSLP64 Sport England) • Waste Water - pleased first part of Water Cycle Study has identified that there are technical solutions for foul water flows for the garden communities/need statement on protecting water quality/options for meeting the challenging targets required. Due to river headwaters expect part two of the Water Cycle Study to address the challenges of permitting for extensions or changes to WRCs (PSLP2921 Environment Agency) • Ensure policies will not have an adverse impact on healthcare provision over plan period/appropriate mitigation where healthcare service capacity insufficient to meet the needs/ NHS body determines exact nature and scale of contribution (West Essex Clinical Commissioning Group PSLP2580) • Sewerage undertaker generally supportive of the requirements on foul and surface water drainage outlined in Policy SP7 for NUGC. However requirements for foul drainage and sewage treatment duplicated in first /second sentences of para 18 of the policy/amend i.e. first 2 sentences of paragraph 18 brought together to make it clear what is the requirement for the applicant and the decision maker at the planning application stage for both the foul sewerage network and receiving Water Recycling Centre (PSLP2514 Anglian Water Services Ltd) • The A505 Corridor Improvement Feasibility Study: A10 to A11, Jan 2018 goes some way to addressing issues on cumulative impacts/continue to discuss with the two authorities and Herts County Council/amend to ...Contributions towards capacity improvements AND OTHER APPROPRIATE MITIGATION MEASURES along the A505 CORRIDOR and junction of the A505 and A1301 will be SECURED ..." (North Hertfordshire District Council PSLP2507) • Include requirement for detailed impacts assessment of designated sites, including Hildersham Wood SSSI, Alder Carr SSSI, Furze Hill SSSI and Nunn Wood SSSI, air and water quality impacts identified via SA/landscape-scale net

	<p>biodiversity gain/positive contribution to the Essex Living Landscape initiative. Also promote the conservation, restoration and enhancement/include explicit requirement for development to protect best agricultural land (Natural England PSLP2454)</p> <ul style="list-style-type: none"> • Welcome criterion (4) providing leisure/recreation as basis for adequate community sports facilities in Garden Community but reference to plan standard not consistent with Policy INF2 – that refers to most up-to-date Sports Strategy (Sport England PSLP64) • Policy SP7 to 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 (Transport for London PSLP2117) • Not fully in accord with NPPF para. 174 requires to promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity (PSLP831 Essex Wildlife Trust) • Include employment floorspace allocations and/or employment land requirements/provide clarification in Policy and employment floorspace allocations and/or employment land requirements. Supportive of bullet points 4/5 but also consider connectivity to these green and open spaces, allotments and recreational facilities to ensure that access to green spaces is as easy as possible/add Provide linkage of green infrastructure to the wider public realm to create green corridors and to improve accessibility for all and develop new links, utilising other components of urban greening. Policy SP7 bullet 15 expand to include the maintenance plan for all green infrastructure and not only maintenance and enhancement of existing watercourses, ponds and lakes/ change to “the environmental net gains, and where there is a net loss from the development to provide provisions through offsetting” • Amend Para 3.101 that cap on housing numbers will be monitored and reviewed/supported by the evidence base/change to “proposed that beyond the end of the plan period, 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. This will be considered through the on-going monitoring and future review process of the Local Plan and its supporting evidence base” (Essex County Council PSLP881 PSLP884 PSLP887 PSLP894) • Criteria 6/8 requirement for NUGC to provide frequent and fast public transport services aligns with Combined Authority ambition for high quality transport solutions for its area’s residents/businesses as set out in its 2030 Ambition document. Agree with requirement in the Policy for co-operation with authorities in Cambridgeshire, and cross-boundary agreement on any contributions. The Cambridgeshire and Peterborough Combined Authority is currently funding a number of studies that may inform that co-operation, including an A505 Study, a strategic review of Bus Services, and feasibility work for a Cambridge Autonomous Metro. As these studies are still ongoing at this stage we are not able to provide a specific response on transport implications but welcome the commitment to engage on those issues through the Development Plan Document (Cambridgeshire and Peterborough Combined Authority PSLP892) • Add reference to creation of multi-user routes/equestrian access Paragraph 6 (Essex Bridleways Association PSLP400)
--	---

	<ul style="list-style-type: none"> • Of the three proposed garden communities, this strategic location in the London-Cambridge Growth Corridor well supported by good road and rail connections to major sub-regional centres of employment (eg Cambridge and Stansted Airport)/very close proximity to the existing employment hubs of Chesterford Research Park and the Genome Campus, so there is the potential for residents of the new settlement to live within cycling / walking distance of their employment. But close proximity of housing and jobs relates only to specific sectors and without a balance of local provision in a wider range of sectors there is a high likelihood that the principle of self-containment will be unattainable. Area has high sensitivity to change/visual impact of the development on nearby villages would be extreme (CPRE Essex PSLP2310) • Area of exceptional scenic beauty. This is an area of rural fields and hills where possible to feel remote from the A130 (Linton) side and the M6 to the west. It is an area beloved by walkers. Large loss of good productive agricultural land. New settlement be built on prominent high land instead of low lying ground. Light pollution from the settlement would be particularly obtrusive over large distances, especially to west in South Cambs. Distant from Essex's urban towns. The extra road traffic would overwhelm the capacity of local roads. The flow of water from a hillside settlement affects drainage into the villages. Hinxton and Duxford already subject to flooding (PSLP2559 CPRE Cambridgeshire & Peterborough) • Rapid Transport System should link settlements with places of work and retail centres if it is to replace private transport to any significant extent. A system which terminated at Stansted Airport would not achieve a significant transport mode shift . No exit onto the A11 so all the traffic would need to exit the settlement on the road to Saffron Walden (Sustainable Uttlesford PSLP2978/PSLP1441 • Infrastructure/influx of population as a result of the new settlement. The services and transport network across the surrounding areas will not be able to cope with increase, which is already under significant strain and combined with Welcome Genome Campus development will worsen. Effects on historic (it neighbours onto a celtic settlement) and rural environment. Many other unique environments ,buildings and properties which will be harmed and their safeguard needed in policies. It will significantly affect environment visually and for wildlife (PSLP2424 Little Linton Farms Partnership) • The site has limitations/constraints on accessibility. More on sustainable measures outside the site/Northern Gateway. The scheme could address these by adopting a number of measures (Abington Park Farm PSLP2924) <p>South Cambridgeshire District Council</p> <ul style="list-style-type: none"> • Focus on ensuring plan compatible with interests of South Cambridgeshire in the short term/early preparation of joint Greater Cambridge Local Plan • Particularly NUGC with the continued economic success of the southern economic cluster in South Cambridgeshire <p>Advantages;</p> <ul style="list-style-type: none"> • Homes at NUGC help to serve the southern employment cluster - Cambridge Biomedical Campus to Wellcome Genome Campus and Granta Park/Babraham Research Campus • Provide homes close to significant jobs existing and proposed in the southern employment cluster, where limited new housing is proposed in the emerging South Cambs Local Plan • South Cambs could take opportunity to discuss with UDC under duty to
--	--

	<p>cooperate, how housing beyond the plan period would be apportioned in future local plans in view of function acknowledged in UDC evidence that it would play in providing housing close to jobs in South Cambs. Such discussions have not taken place. Even if numbers not formally counted towards Greater Cambridge, NUGC would perform role in serving southern employment cluster/inform future development strategy for Greater Cambridge.</p> <ul style="list-style-type: none"> • NUGC’s potential to provide local secondary education capacity close to the proposed Wellcome Trust Genome Campus development for 1,500 new homes (if planning permission granted). <p>Disadvantages:</p> <ul style="list-style-type: none"> • The plan relies on a strategic solution to A505 being delivered to enable the full delivery of the new settlement beyond the plan period, to which there is currently no commitment by the highway authority. Local Plan has 1,925 homes in plan period but questions the robustness of evidence supporting delivery of the new settlement as a whole/not be sustainable development if only part of the new settlement delivered. • Early years of delivery rely on taking up limited capacity/could have impacts on the continued delivery of jobs at existing campuses in South Cambridgeshire in the southern employment cluster. • Wellcome Campus is also developing proposals for a major expansion of the campus and a planning application is anticipated to be submitted this year. The Wellcome proposal will clearly need to be considered on its merits weighing all material planning considerations. The southern cluster is of key importance to the local and national economy. Indeed the Independent Economic Commission in its interim report to the Combined Authority advised that continued success in Greater Cambridge will be essential as part of the ambition to double GVA in the Combined Authority area. • Local traffic problems for nearby South Cambs villages, especially before major A505 improvements are implemented, by traffic ‘rat-running’ through village roads to avoid A505 • An acknowledged landscape impact for South Cambridgeshire given location of new settlement on rising land to the south-east of the A11. • Parallels with North Essex Plan/more certainty on truck road upgrades • Main interest housing close to jobs but transport/landscape impacts not fully resolved • Supports UDC meeting AON but only if accompanied by infrastructure • Uncertainties in provision/funding of additional transport capacity in A505 corridor/S Cambs objects until certainty • Distinct from Cambridgeshire County Council response to UDC transport evidence (reasonably content) • South Cambs supportive of need for an A505 corridor scheme but assuming capacity solutions found not delivered for some years • Deal with either by limiting SP7 to 3300 dwellings or safeguard site for future development/pursue via early plan review • Other potential alternatives without above constraint • Full settlement not deliverable without A505 improvements • Poorly served by public transport/employment/commuting • Need traffic calming measures/strengthen SP7 wording in para 8 • Sustainability appraisal does not take commuting impacts or delivery of transport infrastructure into account
--	--

<ul style="list-style-type: none"> • Constrains scope for growth of key employment centres • Plans should allocate land with the least environmental value or amenity value where consistent with other policies • Significant adverse impacts of sustainability should be avoided and where possible alternatives with less impact pursued/significant transport and landscape impacts • UDC landscape work omits impacts from North Western slopes • Revised NUGC could reduce its harm by avoiding development on the north, west, and eastern edges on the high plateau subject to landscape mitigations, sensitive street lighting/building heights, avoiding slopes facing A11 • If above reduces number of homes UDC should consider amended southern boundary • Sustainability appraisal does not take light pollution into account • Impacts on water supply for Cambridge/South Cambs not assessed • Unclear if secondary school can be delivered/impact on South Cambs • Build out rates too optimistic • Impacts on South Cambs electricity supply possible <p>Options</p> <ul style="list-style-type: none"> • Amend Policy SP7 to include a cap on development at 3,300 dwellings; although assumes not to enable further development in the southern cluster/uncertainty over full deliverability of the new settlement as a whole remains. • Alternatively amend to safeguard the site for future development. If other challenges to the NUGC can be overcome or suitably mitigated so that the only uncertainty remains necessary transport infrastructure, the Local Plan could also include a policy commitment to an early plan review to take place once there is more certainty regarding transport capacity in and around the A505 corridor. Such an approach allows the Combined Authority to firm up its non-statutory spatial plan and its formal transport strategy for the Combined Authority area which will help to provide the policy context for the future of the adjoining parts of South Cambridgeshire (PSLP2689 South Cambs District Council) <p>(Historic England PSLP1849)</p> <ul style="list-style-type: none"> • Object to Garden Communities especially NUGC/site selection process/consider alternative site/ insufficient weight given to heritage • Maybe scope at Easton Park/West of Braintree although in principle objection to NUGC • Given rich historic environment at Great Chesterford significant inter-relationship between Roman Temple, Roman Town and Fort, prominent position, NUGC causes serious harm to historic environment • Welcome preparation of HIA/on-going work to finalise the HIA/once finalised this will need to inform the extent of the site allocation/Local Plan Policy • NUGC entirely green field site prominently located in a wide undulating landscape/long views of the site • Notes findings of UDC Brief HIA that landscape informs heritage assets' character, historical context and their setting • Note Draft HIA finds NUGC has potential to harm the significance of heritage assets • Welcome reference in SP7 to historic environment but this will need to be
--

	<p>refined following completion of the HIA/look forward to continued working with Council</p> <ul style="list-style-type: none"> • UDC Landscape and Visual Appraisal conclude that land at Great Chesterford is of high landscape and visual sensitivity, given its steeply sloping landform and elevated position. • The report whilst mentioning the setting of the listed building on site (Park Farmhouse) makes no mention of setting of other heritage assets including the scheduled monuments and Conservation Area and associated listed buildings. • The more detailed Bidwells LVIA photomontage shows proposed development highly visible/would affect the setting of heritage assets and the wider rural landscape/further photomontages may be needed • Until HIA/policy wording complete difficult for Historic England to give a definitive view on the proposals therefore find unsound/result in severe harm to the character and historic significance of the area and would irreversibly impact upon the setting of nearby heritage assets. • Notwithstanding objection para 3.97 should include more detail on the heritage assets on site/wider area/appropriate treatment informed by HIA • Notwithstanding objection “around” 5000 dwellings/welcome section on the historic environment/may need to tighten reflecting completed HIA/ • Look forward to working with Council/remove duplication/bullet 2b to mention other heritage assets e.g. Great Chesterford Conservation Area/65+ listed buildings/Grade I All Saints Church/Grade II* Old Vicarage/SAMs – Roman And Anglo Saxon Cemeteries/Paddock Wood moated site. • Include a concept/strategy diagram to illustrate the main features of the policy/Garden Community such as access points, heritage assets, buffer zones/strategic planting <p>Great Chesterford Parish Council PSLP2316</p> <p>Introduction</p> <ul style="list-style-type: none"> • Dialogue with GCPC should have been earlier in the process/NUGC unsound/ SP7 fails Duty to Cooperate • Defective selection of NUGC site/came forward in 2015/subject to critical UDC officer assessment/GCPC submitted detailed comments in April 2016 but no response/GCPC excluded from effective consultation • Does not deal with climate change • Not deliverable over the plan period • Does not meet infrastructure needs • Need for 5 year land supply but protect Great Chesterford <p>Specific Objections to SP7</p> <ul style="list-style-type: none"> • High landscape and visual sensitivity/mitigation impacts detrimental to historic pattern character of the existing landscape • UDC reports recognise high landscape/visual sensitivity/cause harm/ suggest impacts could be mitigated, although would have detrimental effect on the historic pattern and character of the existing landscape. • Bidwells LVA wrongly applied landscape capacity methodology • HDA Landscape Assessment judged site to fall within areas with low/negligible landscape capacity to absorb development • Historic significance of area including Scheduled Monuments, make any mitigation incapable of preventing permanent damage • Full Heritage Impact Assessment recommended but not undertaken on built
--	---

	<p>heritage and the setting of heritage assets</p> <ul style="list-style-type: none"> • Contains significant archaeology, from multiple phases, which would be subject to substantial harm as a result of development • Adverse impact upon setting of heritage assets and views • No evidence that impacts from proposal tested/mitigation planned • Only junction modelling/ignored capacity issues on route corridors • UDC's justification for NUGC is too reliant on its proximity to the M11/J9, the railway stations at Great Chesterford/Whittlesford Parkway/local employment opportunities • Routes around Great Chesterford under stress by 2033 • Severe congestion on the A505, A1301 and B184 but no improvement proposals for principal routes • Great Chesterford Rail station inadequate for more usage/Whittlesford unsuitable/reliant on Audley End rail station • Walking/cycling from NUGC is unrealistic • No evidence for WYG 10%/15% modal shift in transport impact • Unachievable sustainable transport policy/mode targets over ambitious • Supports non-car modes only if a realistic prospect of delivery/rural area with low existing usage/RTS needs directness/convenience over car • No Northern access agreed with highways authorities/acquisition of third-party land/enhancements not agreed at Stump Cross use of Park Road makes rat-run to Great Chesterford railway station/Audley End station within the village • Require additional highway access point, preferably to the A11 • Access limitations on Park Road need to be clearly specified • Does not meet SEA objectives 9 (transport) /12 (housing needs). • In rural location distant from major towns/evidence such locations have more travel distances compared to urban or edge urban areas • Insufficient detail on impacts/mitigation, future DPD ineffective • Traffic contributes to CO2/PM10 emissions regardless of reduction in private car use from sustainable transport measures • Inadequate proposals regarding Water and Flooding • Lack of appraisal of Genome expansion/other developments that may impact • Inadequate Sports and recreational facilities proposals • List of specific elements that should not be dealt with in future DPD including details of infrastructure, phasing, transport, water supply <p>Red lines/changes required to SP7</p> <ul style="list-style-type: none"> • Specific mix of sizes, types and tenures/affordable rent/older peoples housing/peppercotted/phased • Range of local employment opportunities maximising links to Genome/Chesterford Research Park/interspersed with residential/education/walking environment • New local centre, mix of retail/offices/community uses, phasing restriction • SAM protected/ interpretive facility provided • Four primary schools/one secondary in advance of need, walking/cycling routes to Great/Little Chesterford, B184 crossing • Early years/childcare/health facilities/community centres in advance of need • Should be integrated with residential areas • Transport choice needed including, fast/frequent public transport to towns/facilities/ nearby employers/Whittlesford Station/before any dwellings • Network of safe walking/cycling routes to Genome/Whittlesford
--	--

	<p>Station/Chesterford Research Park/Saffron Walden/phasing restriction</p> <ul style="list-style-type: none"> • Access Strategy/northbound connects to A11, A1301, [Fourwentways] P&R/A1307 corridor • New vehicular access to site from Granta Park otherwise all vehicular access off Field Farm Drive • No vehicular access to Park Farm or Cow Lane • Traffic mitigation on B184/B1383 before development • New network/primary substations, upgrades/reinforcements in short term • Enhancements to WRC/new connections • Provide natural/Semi natural/amenity space/allotments/open space/recreation facilities • Positively respond to landscape/historic value of site/proposals influenced by LVAs and HIAs, impact on existing villages, not building on visible ridgelines. Improve degraded features, new woodland • Undeveloped/landscaped Buffer Zone 1.5km between Great Chesterford and any NUGC building <p>PSLP2696 Ickleton Parish Council</p> <ul style="list-style-type: none"> • Support South Cambs District Council objections • No evidence to support SP7 • Demand for housing is in South of district/need met by South Cambs proposals/60-70% to be affordable (50% rented) • Landscape impacts/upper slopes developed/night/winter views • No alternatives ever considered/little in plan period/much less environmental impact elsewhere • Transport impacts on rat running via villages, A1301,A505 and junctions, no modal shift, need one job per household • No secondary school/Loss of farmland/Flooding/Water Supply/Heritage impacts <p>PSLP2363 Whittlesford Parish Council</p> <ul style="list-style-type: none"> • Supports objections of other villages • Too dependant on Whittlesford Parkway Station/proposed Rural Travel Hub • Villages would become a rat run • Flooding downstream to all the villages/jeopardise water supply as water comes from boreholes in the chalk <p>PSLP2447 Great Abington</p> <ul style="list-style-type: none"> • No valid justification for selection of NUGC • Far away from UDC housing needs • Costs fall on South Cambs villages • UDC transport work takes no account of permitted growth in S Cambs • Little public transport/expensive • Dependant/limited parking at Whittlesford Station • Cycle route going towards Great Abington relies on private land <p>PSLP2444 Pampisford Parish Council</p> <ul style="list-style-type: none"> • In wrong place to house Essex residents and employees • Roads at capacity at peak times particularly the A1301/ A505 roundabout • IDP Schedules Garden Communities lists improvements but no timescale. • Citi7 bus only passes the site once an hour
--	--

	<ul style="list-style-type: none"> • Greenfield site on rising chalk land/local settlements occupy valley positions/ out of keeping with historical aspect of area. <p>PSLP2372 Little Abington Parish Council</p> <ul style="list-style-type: none"> • Disproportionate development in relation to existing communities • Inadequate consideration of local transport infrastructure requirements Impact on environment/Lack of provision for schools/health & social care • Lack of collaboration and joint development of strategic vision with neighbouring local authorities <p>PSLP1699/PSLP1704 Linton Parish Council</p> <ul style="list-style-type: none"> • Commuter traffic adds to congestion on B1052/ A1307 The Grip/air quality & noise impacts/Linton college • Not sufficient jobs for the residents of NUGC • planning throughout region needs to be co-ordinated/include the Greater Cambridge /City Deal proposals <p>PSLP2277 Duxford Parish Council</p> <ul style="list-style-type: none"> • South Cambs Council have addressed its housing needs in Local Plan/five year housing land supply • Rat-running through the villages of Duxford, Hinxton and Ickleton • Limited parking at Gt. Chesterford Station/limited train service at this station means Whittlesford/Audley End used • Hourly bus service from Grt Chesterford to Cambridge takes over an hour • Flooding downstream in Cam valley/reduction in water entering water table • Impact on the view/light pollution across the area • Genome Campus proposal not considered • Adds load on transport infrastructure as children travel to Saffron Walden, Sawston or Linton in South Cambridgeshire • Lower paid staff at Genome/nearby employment sites not eligible for social housing provision <p>Thriplow Parish Council PSLP1884</p> <ul style="list-style-type: none"> • No valid justification for selection of NUGC/environmental harm caused/ /over-optimistic forecast of delivery <p>Little Chesterford Parish Council PSLP2341</p> <ul style="list-style-type: none"> • Only housing need from Stanstead Airport atypical numbers drives strategy of three garden communities • Heritage Assessments find that development cannot take place without damage to heritage assets • SAM cannot be protected/run-off washing it away/damage visual qualities of the landscape • Chesterford Research Park not growing/UDC own 50% • No evidence for cost per dwelling of infrastructure/£40K invalid • Roads at capacity • Genome expansion likely to be looked on favourably by Secretary of State • Not dealt with separation of communities • The site is of high landscape and visual sensitivity <p>PSLP2407 Littlebury Parish Council</p>
--	---

	<ul style="list-style-type: none"> • Until supporting infrastructure in place NUGC residents will travel to use local services in Saffron Walden and the rail station at Audley End. • School places will be at Saffron Walden, Newport, Stansted possibly Great Dunmow/Great Dunmow too far so quickly need additional school places • Traffic on B1383 route already heavy/speeding/safety issues. Accidents regular Littlebury to Audley End stretch. Reduce speed limit through Littlebury to 20 m.p.h/traffic calming measures. Upgrade to M11J9 needed • Landscaping of native species/wildlife corridors. <p>PSLP2381 Ickleton Society</p> <ul style="list-style-type: none"> • High housing number not needed • Only meets Cambridge commuters housing needs • Quality of the housing will not soften its impact • A full transport assessment has not been undertaken • Assertions about non-car travel not based on factual evidence • distances for walking or cycling are too far for most people • Direct access northbound to the A11 and at M11/J9 and southbound exits a condition for NUGC • Garden Cities only where existing rapid public transport links to major cities, or plans for provision in place • one of the driest areas of the country • water from sewerage works flows into the River Cam increasing the risk of flooding downstream • NUGC not able to support a secondary school since it cannot grow beyond 3300 houses unless the A505 is dualled <p>Residents</p> <p>Those who support with changes</p> <ul style="list-style-type: none"> • Some Great Chesterford residents support the new settlement to get decent, affordable housing/infrastructure but concerns over Garden City Principles not met/land value capture/CPO/achieving 60% non-car modal share (PSLP1063 Mr Simon Witney) <p>Alternatives</p> <ul style="list-style-type: none"> • Better alternative would be Audley End or Whittlesford Station with latter having good access to Strategic Road Network • Does not meet Garden Community principles for 50% self-containment • Not self-sufficient/depends on Saffron Walden's facilities • Typical mixed employment in Saffron Walden • Separation of communities /sense of place /community cohesiveness. • Put the 5000 in Saffron Walden along with a new bypass • No major retail/services in GC centre/remote from rest of Essex • Genome/other centres already provide for housing needs • Commuter suburb of Cambridge/London no employment/drawing in residents rather than providing for UDC housing needs • Putting 10 dwellings in every village would meet the need instead • Worsens affordability process with people vital to the area are priced out • Proximity to Cambridge makes it one of the least affordable locations in the county/meeting affordability needs too challenging • No housing need in north of district/not in HMA/aging population /no affordable or rentable properties/does not meet local needs
--	--

	<ul style="list-style-type: none"> • Each village could take a small amount of houses • Will be purchased by those wanting a slightly cheaper option than Cambridge and so does not help local/young people in UDC • Cambridge City/South Cambridgeshire Councils Plans provide for housing to support the growth in adjacent key industries in their • South Cambs/Genome have already planned for areas housing needs • Not in Strategic Housing Market Area/does not meet local needs • Not most appropriate strategy or deliverable over plan period <p>Landscape</p> <ul style="list-style-type: none"> • County Park needed • Haven for birds, hares, badgers, deer endangered hedgehogs • View from Coploe Hill destroyed • In open countryside, with high detrimental visual impact, obliterate an area of natural beauty • Very visible to the surrounding areas and cannot be developed without causing harm to the wider landscape • New town bigger than Saffron Walden/ new conurbation close to Saffron Walden/no self - containment • Eyesore on hill/completely out of character/loss of agricultural land • Highly visible from South Cambs/opposite side of sensitive Cam Valley (Looking from Strethall/Catmere End), even if building is mainly on the plateau. • Permanently destroy the uplands, the sky-line, good quality agricultural land and add to urbanisation of a rural landscape • All North West Uttlesford's character will be destroyed <p>Infrastructure</p> <ul style="list-style-type: none"> • Schools, GP surgeries, transport improvements before development • Duxford/Great Chesterford primary schools already over capacity • Essex County Council will not pay for any infrastructure/late provision of secondary school in the plan • Chesterford GP practice expanded by about 10% a year recently • Parents will move as close as possible to their preferred school • Early provision of a new primary school in NUGV essential • Genome Campus expansion (1500 homes/175k sqm offices) but no collaboration on resolving infrastructure issues i.e. schools, doctors • Costs in traffic, landscaping, increased flood risks, aquifer damage, light pollution, heritage and infrastructure mostly met by the surrounding villages in South Cambridgeshire <p>Transport</p> <ul style="list-style-type: none"> • Rapid Transport System must link settlements with places of work and retail centre/not terminate at Stansted Airport/cost of billions • Traffic calming essential for Littlebury • Newmarket Road A1383 cannot cope -too narrow/no pavements • Long existing bus journey into Cambridge • Too dependent on Whittlesford Parkway/Mcdonalds roundabout • No detail provided on the proposed cycling improvements NUGC traffic will make Saffron Walden's roads impassable • Access to the A11 should be precondition
--	---

	<ul style="list-style-type: none"> • Proximity to M11 irrelevant/partners of residents do not work in the science clusters • Whittlesford Rural Travel Hub adds additional traffic through villages • No transport plans agreed with the highways authorities • Rat-running through Ickleton/Duxford already problem will worsen • Underpass near Great Chesterford level crossing accident black spot • Significant improvement to M11/local A roads before development • Illegal verge parking already frequent at Great Chesterford station • Larger train stations Audley End/Whittlesford already fill up • Far away from employment opportunities i.e. Stansted Airport/no facilities for many years/traffic heading to Cambridge for jobs and services • A1301/Sawston roundabout already overcrowded • No consideration to access from the A11 and the M11 • Sustainable alternatives to the A505/A1301 and B184 congestion problems not identified <p>Heritage/Archaeology</p> <ul style="list-style-type: none"> • Uplands based on last remaining hunting forest, ancient saxon burial sites crossing of the oldest pathway in the UK • Roman Temple has greater risk of flooding • Loss of prime agricultural land, threaten the ancient monuments, ancient woodland, Roman remains, and the Icknield Way • Local History and Archaeology not considered • Protect/provide green spaces/threat to Hildersham Wood SSSI <p>Water</p> <ul style="list-style-type: none"> • Concerns about water run off from the proposed new town increases the risk of flooding for Hinxton and downstream. • Threat to local water supply/aquifers/risk to natural run-off/flooding • In dry area/on aquifer/more flooding/ 55% impermeable surfaces. • Unmanageable traffic burdens on Hinxton/neighbouring villages with no prospect of mitigation • Whatever SUDS schemes used run off likely to be greater/South Cambs chalk aquifer cannot sustain any further abstraction <p>Other</p> <ul style="list-style-type: none"> • Intrusive for North Uttlesford crematorium • Contravention of the Human Rights Act/location's quiet enjoyment • Politically led at a national level yet huge local opposition <p>Welcome Trust PSLP2975</p> <ul style="list-style-type: none"> • Reasonable alternatives not considered/higher delivery in other GCs an alternative or West of Braintree/Easton Park/Chelmer Mead scenario better or more small sites mean NUGC not needed • Only considers sites submitted to UDC • Strategy does not seek to meet the Full AON • Sustainability Appraisal makes no conclusions on sustainability • Further assessment needed on water and heritage impacts especially mitigation • Full scale of NUGC not assessed or deliverable
--	---

	<ul style="list-style-type: none"> • Over reliance on new settlements for delivery • IDP has no timings/no critical mass /no strategic transport solution identified • DPDs ineffective/North Essex plan not viably delivered • Cost of modal shift not included in Viability Assessment • No strategic solution identified for A505 • No employment minima in SP7 • No account taken of planning application for 1500 dwellings/rapid commencement • No housing need for NUGC/only provides for Cambridgeshire • Take account of 2018 NPPF • Need to focus new development where can reduce travel between homes, jobs and services and facilities and where alternatives to using car/reduces overall environmental impact • All three garden villages at top of Lichfields housing delivery range/ need additional sites early in plan period. (Village Developments Takeley PSLP2915) • Three garden communities presents risk to housing delivery/additional allocations needed to ensure sufficient housing land to maintain delivery during changing economic circumstances (Bloomhall PSLP187) • Focus on delivering two garden villages nearer employment locations/main road network (A120)allocate more smaller allocations (St Edmunds Lane Management Limited PSLP1809) • Access constraints/measures suggested Abington Park Farm PSLP2924 • While Garden Communities in addressing housing need is valid plan may not be effective given reliance on 60% modal shift (Grant and Bloor PSLP2899) • Fulfils housing needs of Cambridge housing market rather than the West Essex and East Herts market/concern of adjoining LPA notable. (Trustee of N Streeter Will Trust PSLP2867) • A unilateral move by UDC would risk the effective cross-boundary cooperation that currently exists (Endurance Estates PSLP2834) • Housing requirement of 14,600 dwellings (2011 to 2033) not based on a sound assessment of needs for Housing Market Area/ shortfall in housing supply/over reliant on GCs. LDS does not set timescale for DPD preparation/ allocate additional sites/delivered earlier in the plan . HMA underestimate housing need/increase housing requirement (Persimmon PSLP2672) • NUGC not justified/set out a range of concerns in relation to the delivery of this site within its response to Regulation 18 consultation that stand (Fairfield (Elsenham) PSLP2783) • UDC housing supply of 14,712 falls 258 units below its 14,000 dwelling requirement if West of Braintree GC does not happen/if other two garden communities do not happen or delayed the Council will fall below its housing requirements/must seek to improve its housing supply position (Chase New Homes PSLP2197) • NUGC not a suitable location for a new settlement/concerns surrounding deliverability/ serves housing needs of SCDC/ ability to deliver transport infrastructure to enable its development, greater certainty and commitment is needed over the provision necessary transport infrastructure in order to demonstrate that the garden communities which rely on the upgrades are deliverable in full/ no evidence 60% of all trips will be made by sustainable modes/does not commit to the delivery of a significant amount of employment (Countryside Properties UK Limited PSLP2765)
--	--

	<ul style="list-style-type: none"> • NUGC has negative landscape impact/congestion on the local highways network/scored poorly against a number of the Sustainability Appraisal Objectives/negative impact on; water quality, the landscape, the areas heritage assets, potential for contamination and poor bus links. Meets housing needs of Cambridge not Uttlesford. Unlikely to be self-sustaining/policy does not commit to the delivery of a significant amount of employment/not located on train line /commuting by car to Cambridge (The Crown Estate PSLP2750) • Not a sustainable form of development due to the detrimental impact it will have on the human infrastructure together with the requirements for the flora and fauna (James Binney Will Trust PSLP1540) • No evidence why necessary to locate a Garden Communities in an attractive rural area or that the reasons for doing so outweigh the environmental harm that will be caused. Reliance on this and other Garden Communities to meet its OAN has not been adequately justified via the Sustainability Appraisal. Over-optimistic forecast of housing delivery prior to 2033 /absence of any connection with the delivery of transportation investment (Edward Gittins PSLP1860) <p>Grosvenor (PSLP950)</p> <ul style="list-style-type: none"> • Supports SP7 noting NUGC will deliver 5000 homes, local employment opportunities, and community infrastructure. • Strategic location in north of district for London Stansted Cambridge growth corridor, LSC Growth Corridor recognised by Government as a key location for economic and population growth in the South East/UDC located centrally within the Corridor, where housing pressures are significant/NUGC will play a vital role helping meet the housing/economic needs of Corridor; meeting housing needs in district, balancing growth between north and south of Uttlesford district • Support growth of UDC communities/job markets in north of district/recognise distinction in the work locations of residents in North Uttlesford compared to South Uttlesford, need alignment of housing growth with supporting employment • Utilises key infrastructure/sustainable transport, • NUGC's location benefits from excellent connections to the transport network including the Cambridge to London rail corridor, the M11/A11 strategic road network and emerging proposals for the Cambridge Autonomous Metro • Sustainable transport strategies can capitalise on the connections to thriving life science and research employment market, to help reduce travel distances and enhance existing transport options for public transport, cycling and walking; and • Support Cambs southern life cluster/Unique opportunity to provide housing for workers and create employment opportunities which support the life sciences, research and innovation sector • Economic role providing employment opportunities on a range of uses, providing location that supports key cluster. Social Role providing 5000 mix of homes meeting present and future needs, range of jobs, community infrastructure needs. Environment role assimilating development into landscape/structural planting, net biodiversity gains/minimal heritage impacts. • Support principle of set of development requirements that NUGC will accord
--	--

	<p>with on landuses, transport, historic/natural environment, utilities, governance and stewardship</p> <p>Amendments to SP7/requirements;</p> <p>Para 2 para add <i>Deliver a range of local employment opportunities integrated into the new community comprising approximately 60,000 square metres of employment floorspace (B1a, B1b, B1c, B2, B8 and Sui Generis/delete Floorspace allocations to be defined within the Strategic Growth Development Plan Document.</i></p> <p>Para 3 Planning applications determined in accordance with the development principles set out in the DPD consistent with the approved DPD which will need to be in place before any consent is granted for the new Garden Community. and the requirements of Policy D4 – Development Frameworks and Codes.</p> <p>Paragraph 6 <i>Incorporate, from the early delivery phase of the garden community, a package of measures to provide transport choice, including the delivery of high quality, frequent and fast public transport connections to important on- and off-site generators of travel demand, to reduce the reliance on the private car. Saffron Walden, Cambridge, Whittlesford Rail Station, Audley End Rail Station, Great Chesterford Rail Station and nearby employment parks (including the Wellcome Genome Campus and Chesterford Research Park).</i></p> <p>Paragraph 6: A network of direct, high quality, safe walking and cycling routes will also be provided to enhance permeability within the site and to access nearby employment areas, transport hubs and communities. A range of opportunities will be explored through the development of the DPD to provide high quality walking and cycling links, for example improving links to including linking the existing cycle path from Hinxton to Saffron Walden, and linking to Great Chesterford Rail Station and the nearby employment parks. via the PROW adjoining Great Chesterford to the North West of Jackson's Lane.</p> <p>Paragraph 8 “amend Provide an access strategy that a strategy that offers connections with the A11, A1301 and the Cambridge Park & Ride being explored as part of the Cambridge South East Study (on the A1307), with the A11 being the preferred route for northbound travel.The development will avoid discourage the use of unsuitable roads by car through existing communities”.</p> <p>Para 3.100 3rd sentence add “Discussions will also be held with Highways England regarding a new access onto the A11 to the north of the site to ensure that the full range of options is explored. A northbound public transport, walking and cycling link to this destination has the opportunity to deliver considerable benefits to the scheme.</p> <p>Para 3.101 WYG’s vehicular trip assumptions for NUGC do not account for the high levels of internalisation within the site/22% rising to 40% for the full development scenario. Amount of development which could be accommodated is likely to be higher than the suggested 3,330 cap. Any restriction on development to be cognisant of transport conditions at the time.</p> <p>Paragraph 3.101 add “Based on the Local Plan traffic forecasts in the evidence base, the proposed developer funded highway improvements could accommodate up to 3,300 new homes at North Uttlesford ... Development beyond this level would need to be considered as part of a ‘Monitor and Manage’ approach to development to ensure strategic highway improvements depend upon strategic highway improvements to the A505 Corridor between the M11 and A11 comes forward at the right time. such as dualling of the A505 between M11 and A11 junctions. It is proposed that beyond the end of the plan</p>
--	---

	<p><i>period, a monitoring strategy is identified and agreed with relevant stakeholders of 3,300 new homes is which will require the traffic impacts to be reviewed for significant additional phases of development based on the performance of the network at the time placed on any allocation at North Uttlesford Garden Community to ensure that development over this figure shown to have severe impacts.....</i></p> <p>Historic Environment</p> <p>1. . delete <i>The sense of tranquillity within the site should be maintained.</i></p> <p>3. <i>Conserve and where appropriate enhance the significance of heritage assets and their settings both within the site and the wider area. Where mitigation is required, measures will have regard to the HIA-Heritage Impact Assessment submitted with an application and include:</i></p> <p>4. <i>Conserve and where appropriate enhance the significance of heritage assets and their settings, both within the site and in the wider area. Where mitigation is required, measures will have regard to the HIA and include:</i></p> <p>Para 3.97 add “...evidence of potential for significant buried archaeology ... in the wider area. The HIA concludes A Heritage Impact Assessment will therefore be required with any application to demonstrate how future development will mitigate any potential impacts on, and where possible, enhance heritage assets within and surrounding the site.”</p> <p>Natural Environment</p> <p>Acknowledge Land at Great Chesterford Landscape and Visual Appraisal, prepared by CBA (June 2017) identifies parts of the site have a sense of tranquillity which should be maintained.</p> <p>13. add Where appropriate, the sense of tranquillity within the site should be maintained.</p> <p>Paragraph 3.97: add “A Landscape and Visual Impact Assessment will therefore be required with any planning application to demonstrate how development will mitigate any potential impacts on, and where possible, enhance the landscape.”</p> <p>17. Ultrafast Superfast broadband will be provided ...</p> <p>19. Add “Sustainable Drainage Systems should also address the groundwater protection zone and flooding constraints and, where possible, provide betterment.</p> <ul style="list-style-type: none"> ● First sentence of paragraph 3.96: <i>This Local Plan sets out the principle of development at North Uttlesford within a broad area of search and identifies the form of the development...</i>
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> ● SP7 Criterion (4) refer to most up-to-date Sports Strategy recreation in line with the most up-to-date Sports Strategy, standards established in the Local Plan, the Essex Design Guide and the Strategic Growth Development Plan Document (PSLP64 Sport England) ● Add will not have an adverse impact on healthcare provision over plan period/appropriate mitigation where healthcare service capacity insufficient to meet the needs/ NHS body determines exact nature and scale of contribution (West Essex Clinical Commissioning Group PSLP2580) ● Bring together first 2 sentences of paragraph 18 to make clear the requirement for the applicant and the decision maker at the planning application stage for both the foul sewerage network and receiving Water Recycling Centre (PSLP2514 Anglian Water Services Ltd) ● Amend to ...Contributions towards capacity improvements AND OTHER

	<p>APPROPRIATE MITIGATION MEASURES along the A505 CORRIDOR and junction of the A505 and A1301 will be SECURED ..." (North Hertfordshire District Council PSLP2507)</p> <ul style="list-style-type: none"> • Include requirement for detailed impacts assessment of designated sites, including Hildersham Wood SSSI, Alder Carr SSSI, Furze Hill SSSI and Nunn Wood SSSI, air and water quality impacts identified via SA/landscape-scale net biodiversity gain/positive contribution to the Essex Living Landscape initiative. Also promote the conservation, restoration and enhancement/include explicit requirement for development to protect best agricultural land (Natural England PSLP2454) • Highlight 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 (Transport for London PSLP2117) • Not fully in accord with NPPF para. 174 requires to promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity (PSLP831 Essex Wildlife Trust) • Include employment floorspace allocations and/or employment land requirements/provide clarification in Policy/employment allocations and/or land requirements. Bullet points 4/5 add Provide linkage of green infrastructure to the wider public realm to create green corridors and to improve accessibility for all and develop new links, utilising other components of urban greening. Expand bullet 15 to include maintenance plan for all green infrastructure and not only maintenance and enhancement of existing watercourses, ponds and lakes/ change to "the environmental net gains, and where there is a net loss from the development to provide provisions through offsetting" Amend Para 3.101 to "proposed that beyond the end of the plan period, a cap of 3,300 new homes is placed on NUGC to ensure that development over this figure does not take place until strategic highway improvements have been implemented. This will be considered through the on-going monitoring and future review process of the Local Plan and its supporting evidence base" (Essex County Council PSLP881 PSLP884 PSLP887 PSLP894) • Add reference to creation of multi-user routes/equestrian access Paragraph 6 (Essex Bridleways Association PSLP400) <p>South Cambridgeshire District Council - Options</p> <ul style="list-style-type: none"> • Amend Policy SP7 to include a cap on development at 3,300 dwellings; although assumes not to enable further development in the southern cluster/ uncertainty over full deliverability of the new settlement as a whole remains. • Alternatively amend to safeguard the site for future development. If other challenges to the NUGC can be overcome or suitably mitigated so that the only uncertainty remains necessary transport infrastructure, the Local Plan
--	--

	<p>could also include a policy commitment to an early plan review to take place once there is more certainty regarding transport capacity in and around the A505 corridor (PSLP2689 South Cambs District Council)</p> <p>Historic England</p> <ul style="list-style-type: none"> • Remove NUGC/consider alternative site/give more weight to heritage • Notwithstanding objection para 3.97 should include more detail on the heritage assets on site/wider area/appropriate treatment informed by HIA • Notwithstanding objection “around” 5000 dwellings/welcome section on the historic environment/may need to tighten reflecting completed HIA/ • Look forward to working with Council/remove duplication/bullet 2b to mention other heritage assets e.g. Great Chesterford Conservation Area/65+ listed buildings/Grade I All Saints Church/Grade II* Old Vicarage/SAMs – Roman And Anglo Saxon Cemeteries/Paddock Wood moated site. • Include a concept/strategy diagram to illustrate the main features of the policy/Garden Community such as access points, heritage assets, buffer zones/strategic planting (Historic England PSLP1849) <p>Great Chesterford Parish Council PSLP2316</p> <p>Red lines/changes required to SP7</p> <ul style="list-style-type: none"> • Specific mix of sizes, types and tenures/affordable rent/older peoples housing/peppercotted/phased • Range of local employment opportunities maximising links to Genome/Chesterford Research Park/interspersed with residential/education/walking environment • New local centre, mix of retail/offices/community uses, phasing restriction • Protect SAM /provide interpretive facility • Four primary schools/one secondary in advance of need, walking/cycling routes to Great/Little Chesterford, B184 crossing • Early years/childcare/health facilities/community centres in advance of needs • Integrated with residential areas • Transport choice needed including, fast/frequent public transport to towns/facilities/ nearby employers/Whittlesford Station/before any dwellings • Network of safe walking/cycling routes to Genome/Whittlesford Station/Chesterford Research Park/Saffron Walden/phasing restriction • Access Strategy/northbound connects to A11, A1301, [Fourwentways] P&R/A1307 corridor • New vehicular access to site from Granta Park otherwise all vehicular access off Field Farm Drive • No vehicular access to Park Farm or Cow Lane • Traffic mitigation on B184/B1383 before development • New network/primary substations, upgrades/reinforcements in short term
--	--

	<ul style="list-style-type: none"> • Enhancements to WRC/new connections • Natural/Semi natural/amenity space/allotments/open space/recreation facilities • Positively respond to landscape/historic value of site/proposals influenced by LVAs and HIAs, impact on existing villages, not building on visible ridgelines. Improve degraded features, new woodland • Undeveloped/landscaped Buffer Zone 1.5km between Great Chesterford and any NUGC building (Great Chesterford Parish Council PSLP2316) <p>Littlebury Parish Council</p> <ul style="list-style-type: none"> • Need additional school places quickly • Reduce speed limit through Littlebury to 20 m.p.h/traffic calming measures. • Upgrade to M11J9 needed • Landscaping of native species/wildlife corridors PSLP2407 Littlebury Parish Council <p>Welcome Trust</p> <ul style="list-style-type: none"> • Focus new development where can reduce travel between homes, jobs and services and facilities and where alternatives to using car/reduces overall environmental impact (Welcome Trust PSLP2975) <p>Other Landowners/developers</p> <ul style="list-style-type: none"> • All three garden villages at top of Lichfields housing delivery range/ need additional sites early in plan period. (Village Developments Takeley PSLP2915) • Commit to delivering a significant amount of employment (Countryside Properties UK Limited PSLP2765) • Safeguard unique environments ,buildings and properties in policies (PSLP2424 Little Linton Farms Partnership) • Transport measures: More on sustainable measures outside the site/Northern Gateway. Internalise more movements/Improvements at A11 Stump Cross roundabouts. New access onto the B184/New pedestrian/cycle connections linking with Chesterford Research Park, Great Chesterford station, Saffron Walden /Wellcome Trust. Pedestrian/cycle bridge or tunnel to deal with A11 barrier effect. New public bus service connecting the Wellcome Genome Campus, Whittlesford Parkway, Granta Park and the site. A “Northern Gateway” to site promoting sustainable movement. Support strategic improvements to the A505, or to Junction 9 of the M11. (Abington Park Farm PSLP2924) <p>NUGC Site Owner/promoter</p> <p>Supporting Text to SP7/requirements;</p>
--	---

Para 3.101 WYG's vehicular trip assumptions for NUGC do not account for the high levels of internalisation within the site/22% rising to 40% for the full development scenario. Amount of development which could be accommodated is likely to be higher than the suggested 3,330 cap. Any restriction on development to be cognisant of transport conditions at the time.

- Paragraph 3.101 add "**Based on the Local Plan traffic forecasts in the evidence base, the proposed developer funded highway improvements could accommodate up to 3,300 new homes at North Uttlesford ... Development beyond this level would need to be considered as part of a 'Monitor and Manage' approach to development to ensure strategic highway improvements depend upon strategic highway improvements to the A505 Corridor between the M11 and A11 comes forward at the right time. such as dualling of the A505 between M11 and A11 junctions. It is proposed that beyond the end of the plan period, a monitoring strategy is identified and agreed with relevant stakeholders of 3,300 new homes is which will require the traffic impacts to be reviewed for significant additional phases of development based on the performance of the network at the time placed on any allocation at North Uttlesford Garden Community to ensure that development over this figure shown to have severe impacts.....**

Amendments to SP7/requirements;

Para 3 of introductory text

-Planning applications will be **determined in accordance with the development principles set out in the DPD** consistent with the approved DPD ~~which will need to be in place before any consent is granted for the new Garden Community and the requirements of Policy D4 – Development Frameworks and Codes.~~
- Para 2 para add ... employment floorspace **(B1a, B1b, B1c, B2, B8 and Sui Generis)**/delete Floorspace allocations to be defined within the Strategic Growth Development Plan Document.
- Paragraph 6: frequent and fast public transport connections to **important on- and off-site generators of travel demand, to reduce the reliance on the private car.** ~~Saffron Walden, Cambridge, Whittlesford Rail Station, Audley End Rail Station, Great Chesterford Rail Station and nearby employment parks (including the Wellcome Genome Campus and Chesterford Research Park).~~
- Paragraph 6; A range of **opportunities will be explored through the development of the DPD to provide high quality walking and cycling links, for example improving links to including linking the existing cycle path from Hinxton to Saffron Walden, and linking to Great Chesterford Rail Station and the nearby employment parks. via the PROW adjoining Great Chesterford to the North West of Jackson's Lane.**
- Paragraph 8 "**amend Provide an access strategy that a strategy that offers connections with the A11, A1301 and the Cambridge Park & Ride being explored as part of the Cambridge South East Study (on the A1307), with the A11 being the preferred route for northbound travel.The development will avoid discourage the use of unsuitable roads by car through existing communities**".
- Para 3.100 3rd sentence add "**Discussions will also be held with Highways England regarding a new access onto the A11 to the north of the site to ensure that the full range of options is explored. A northbound public**

	<p><i>transport, walking and cycling link to this destination has the opportunity to deliver considerable benefits to the scheme.</i></p> <p>Historic Environment</p> <ul style="list-style-type: none"> • <i>Para 1. . delete The sense of tranquillity within the site should be maintained.</i> • <i>Para 3. Conserve and where appropriate enhance the significance of heritage assets and their settings both within the site and the wider area. Where mitigation is required, measures will have regard to the HIA Heritage Impact Assessment submitted with an application and include:</i> • <i>Para 4. Conserve and where appropriate enhance the significance of heritage assets and their settings, both within the site and in the wider area. Where mitigation is required, measures will have regard to the HIA and include:</i> <p>Para 3.97 add “There is also evidence of <i>potential</i> for significant buried archaeology on the site and in the wider area. The HIA concludes there is some scope for development of the site and suggests measures for avoiding and mitigating harm to the significance. A Heritage Impact Assessment will therefore be required with any application to demonstrate how future development will mitigate any potential impacts on, and where possible, enhance heritage assets within and surrounding the site.”</p> <p>Natural Environment</p> <p><i>Para 13. add Where appropriate, the sense of tranquillity within the site should be maintained.</i></p> <p>Paragraph 3.97: add “A Landscape and Visual Impact Assessment will therefore be required with any planning application to demonstrate how development will mitigate any potential impacts on, and where possible, enhance the landscape.”</p> <p><i>Para 17. Ultrafast Superfast broadband will be provided ...</i></p> <p><i>Para 19. Add “Sustainable Drainage Systems should also address the groundwater protection zone and flooding constraints and, where possible, provide betterment.”</i></p> <p>First sentence of paragraph 3.96: <i>This Local Plan sets out the principle of development at North Uttlesford within a broad area of search and identifies the form of the development...</i></p> <p>Residents</p> <ul style="list-style-type: none"> • Meet Garden City Principles /provide land value capture mechanism/Use CPO (PSLP1063 Mr Simon Witney) • Early provision of school places on NUGC • Reduce dependence on Whittleford Parkway and Hub/McDonalds roundabout • Access to the A11 should be precondition
Uttlesford District Council Regulation 19 Pre-submission Local Plan; Summary of Responses	
Section / Paragraph / Policy	Summary of Responses
Policy SP8 West of Braintree Garden Community	
SUPPORT	8
OBJECT	89
SUMMARY OF REPRESENTATI	<ul style="list-style-type: none"> • Waste Water: Support statements that the first part of Water Cycle Study has identified that there are technical solutions for foul water flows for the garden

<p>ONS IN SUPPORT</p>	<p>communities. However a statement about protecting water quality and that there are options for meeting the challenging targets required, should also be added. Due to the high percentage of WRCs that are located at river headwaters with limited dilution capacity we expect part two of the Water Cycle Study to address the challenges of permitting for extensions or changes to WRCs.</p> <p>Flood Risk: support the text within the utilities section that the communities will 'provide Sustainable Urban Drainage systems to provide water quality, amenity and ecological benefits as well as flood risk reduction. (PSLP2922 Environment Agency)</p> <ul style="list-style-type: none"> • Editorial and advisory comment: Paragraph 9 under Historic Environment relates predominately to Wildlife and contains two separate tier of wildlife designation. (PSLP901 ECC) • Highways England have been heavily involved in the transport evidence base and support the enhancement to public transport and sustainable mode offer across the district and practically for the garden village developments. It will be essential for the garden villages, that housing comes forward along with schools, Drs Surgery, other health care provision, shops, jobs, public transport and other infrastructure as the demand arises (PSLP3028 Highways England) • The parish council would like to point out that new settlements can be very nice places to live, providing sufficient facilities and infrastructure are provided, and it acknowledges the need for increased affordable housing to be made available for young people in the district. However there are concerns about creation of urban sprawl; impact on existing highways and public transport network (PSLP840 Fritch Green Parish Council) • Galliard controls through option the southern section of the land. Development can commence in 2022/3 and a minimum of 1400 homes can be delivered within the plan period. The land to the rear is controlled by the Andrews Airfield Consortium, with whom there is a co-operative approach to master planning. Land to the east within Braintree Council is largely under similar control, so the Plan can be considered effective also as it based on joint working cross-boundary by the two authorities and the respective landowners to deliver this strategic proposal in a consistent manner. (PSLP3055 Galliard Homes) • Support policy which has been prepared in consultation with Braintree DC and other stakeholders. It is justified through the evidence base and master plan. Committed to sustainable long-term governance and stewardship arrangements for community assets. (PSLP1994 Andrewsfield New Settlement Consortium) • The combined settlement options comprising West of Braintree, Easton Park and Chelmer Mead performed most strongly when assessed against sustainability Objectives compared to North Uttlesford GC. (PSLP2977 Welcome Trust)
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • There are concerns regarding the potential for detrimental impact on nearby listed buildings, Scheduled monument, conservation area and Andrewsfield Airfield. Work on a full Heritage Impact Assessment is welcomed but until finalised and it has informed the extent of the allocation and the policy wording the policy is considered unsound. (PSLP1855 Historic England) • Paragraph 9 is incorrectly shown under Historic Environment subheading. Reference to Essex Rams is supported but should be reworded to clarify that it is not Essex wide and that it is required to mitigate the impact of recreational pressures/disturbance from development on Essex Coastal SACs and SPAs and

	<p>not ancient woodland.</p> <p>The policy does not recognise that the site is likely to lie within the Zone of Influence for potential air quality impacts through increased traffic levels to Epping Forest SSSI, SAC.</p> <p>The policy omits requirement for development to provide a metric to demonstrate net gains for biodiversity and green infrastructure in accordance with Garden City Principles, emerging North Essex Authorities Section 1 Shared Strategic Local Plan, NPPF and Defra 25 Year Environmental Plan.</p> <p>The policy omits to protect and enhance the landscape which may be valued locally.</p> <p>The policy should promote the conservation, restoration and enhancement of priority habitats, ecological networks and priority species.</p> <p>The policy does not recognise loss of agricultural land. (PSLP2455 Natural England)</p> <ul style="list-style-type: none"> • Anglian Water as sewerage undertaker generally supportive of the requirements relating to foul and surface water drainage as. However:- <ul style="list-style-type: none"> - the wording relating to the requirements for foul drainage and sewage treatment which appears in second paragraph under the heading utilities should be amended to ensure it is effective. - the wording relating to the requirements for foul drainage does not appear to refer to an upgrade for sewage treatment as identified in the Council's Water Cycle Study. (PSLP999 / PSLP2525 Anglian Water) • In response to the letter from the Inspector of the North Essex Section 1 Plan Braintree DC would like to work with UDC to allocate a floorspace requirement for WoBGC. BDC objects to the omission of land between Boxted Wood and Andrewsfield within the area of search which would provide maximum flexibility for the location of the built development and for appropriately landscaped buffers and open space to neighbouring settlements. BDC supports the amended paragraphs on Transport. (PSLP2058 Braintree DC). • In response to the letter from the Inspector of the North Essex Section 1 Plan, the policy is lacking an indicative floorspace allocation for employment (PSLP882 ECC) • The policy does not consider the importance of connectivity between green and open spaces, allotments and recreational facilities to enhance recreational experience and opportunities especially if there are footpaths or cycleways and to ensure that access is as easy as possible. (PSLP885 ECC) • Paragraph 15 should relate to green infrastructure and not just blue infrastructure. The 25 Year Environment Plan aims to embed an 'environmental net gain' principle for development including housing as mandatory, building on the current policy that the planning system should provide biodiversity net gains where possible. This is an opportunity to embrace emerging changes that will occur over the lifetime of the Local Plan. (PSLP888 ECC) • Point 4 requires facilities to be provided in accordance with standards established in the Local Plan which is not consistent with Policy INF2 which requires provision in accordance with the most up to date Sport Strategy. (PSLP65 Sport England) • 1. 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. 2. In instances where major policies involve the provision of development in
--	--

	<p>locations where healthcare service capacity is insufficient to meet the augmented needs appropriate mitigation will be sought.</p> <p>3. Policies should be explicit in that contributions towards healthcare provision will be obtained and the Local Planning Authority will consider a development's sustainability with regard to effective healthcare provision.</p> <p>4. The exact nature and scale of the contribution and the subsequent expenditure by the NHS body responsible at that time, will be calculated as and when schemes come forward over the plan period to realise the objectives of the Local Plan.</p> <p>5. Before further progression and amendment of policies are undertaken, the Local Planning Authority should have due regard to any NHS national and local policies and plans and strategies.</p> <p>6. 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 the NHS to carry out certain development within a set timeframe, and do not give undue commitment to projects (PSLP2582 West Essex Clinical Commissioning Group)</p> <ul style="list-style-type: none"> • Concerned about lack of public transport and increased pressure on the existing roads especially the A120 and B1256; coalescence; lack of consideration of alternative sites; loss of agricultural land and natural habitat; deliverability in current economic climate; detrimental impact on heritage assets. No account has been taken of Inspector's decision on NEGC. (PSLP2659 Gt Saling PC) • Stebbing Parish Council is implicitly opposed to the WoBGC due to its harmful impacts it would have upon the setting of the village and its historic character. Given that the North Essex Joint Examination Inspector has very clearly stated that the Joint Strategic Plan cannot be made sound without the removal of the three proposed garden communities from the Plan, including the West of Braintree Garden Community, we consider that the same conclusion must apply to the Uttlesford Local Plan. We strongly believe that once evidence underpinning the proposed West of Braintree Garden Community is reconsidered by the three Joint Authorities, there is a high likelihood that more appropriate and sustainable locations for major new housing development will be preferred. Sceptical regarding the cost and delivery of transport infrastructure to achieve step change increase in sustainable travel modes; deliverability of 40% affordable housing; implications of mineral extraction. (PSLP2205 Stebbing PC) • Object that WoBGC will be sandwiched in open countryside between two historic settlements of Stebbing and Great Saling having a serious adverse impact on historic assets, agricultural land and landscape. It is an unsustainable location poorly located to services and facilities including public transport. Development will cause harm to the natural environment with particular reference to Boxted Wood. In preparing the NP the group have evidence indicating the impact on Historic assets and landscape. Working of the minerals site will affect the delivery of the GC. The proposal prejudices the emerging LP and does not take into account the evidence base of the NP. The development will result in the loss of the Andrewsfield Airfield a long-established, important and valuable resource and facility for commercial and leisure flying as well as providing pilot training and meeting emergency service needs. (PSLP3007 Stebbing Neighbourhood Plan) • The Rapid Transport System would need to link settlements with places of
--	---

	<p>work and retail centres if it were to replace private transport to any significant extent. A system which terminated at Stansted Airport would not achieve a significant transport mode shift. (PSLP2030 Sustainable Uttlesford)</p> <ul style="list-style-type: none"> • No reference to the creation of multi-user routes in accordance with Garden Community Principles. The policy mentions the Flitch Way and this is a definitive bridleway and therefore any links to this route should carry the same definitive status. (PSLP401 Essex Bridleway Assoc; PSLP401 British Horse Society; PSLP627 Flitchway Action Group) • The site boundary includes areas of ancient woodland and should only be lost to development in wholly exceptional circumstances. (PSLP819 Woodland Trust) • The policy does not fully reflect the principles of paragraph 174 of NPPF. (PSLP832 Essex Wildlife Trust). • It is not clear how issues relating to the airports operation or national aviation policy in respect of west of Braintree housing allocation have been considered. Point 6: there is no robust evidence to demonstrate the transport need or benefits that may arise from a transit link, or its implications and impacts, including its environmental cost, or any reasonable alternatives that have been considered. <p>The site falls just 1km outside the 13km bird hazard consultation zone. Even though outside the consultation zone, a development of this scale could give rise to potential risk that requires assessment, particularly as a result of the SUDS and green infrastructure aspirations that are stated in the plan. There is no reference to aerodrome safeguarding effects in the policy specifically. (PSLP1514 Manchester Airport Group)</p> <ul style="list-style-type: none"> • A delay in the delivery of one of the garden communities will have significant implications for delivery rates and the associated five year housing land supply. (PSLP188 Bloomhall) • A delay in the delivery of one of the garden communities will have significant implications for delivery rates and the associated five year housing land supply. (PSLP188 Bloomhall) • Concerns over delivery following conclusions of the Inspector examining the North Essex Strategic Section 1 Plan. (PSLP902 Bloor Homes) (PSLP2766 Countryside) (PSLP1863 Edward Gittins Assoc) (PSLP2833 Endurance Estates) (PSLP2900) Martin Grant Homes & Bloor Homes (PSLP2977 Welcome Trust) (PSLP2751 Crown Estate) (PSLP2866 Trustee of N Streeter Will Trust) PSLP2232 (WeAreResidents.org) PSLP2785 Fairfield Elsenham) PSLP2294 Eclipse Planning) and individual residents. • Development unacceptable due to impacts on the landscape, heritage, adverse impact on the countryside and ancient woodland, as well as impact on the neighbouring communities at Stebbing Green and Stebbing Village generally. (PSLP902 Bloor Homes) • . Taking into account constraints consider that the developable area is no more than 60ha and therefore cannot provide the scale of development proposed by the policy. (PSLP902 Bloor Homes) • Uttlesford Site is not sustainable. Concerns about delivery of transport infrastructure to achieve step change increase in sustainable travel modes. (PSLP2766 Countryside Properties) (PSLP2833 Endurance Estates) (PSLP2900) Martin Grant Homes & Bloor Homes (PSLP2751 Crown Estate) • The location of the settlement and infrastructure requirements dictate that the first phases of development should come forward in within the Braintree District. No evidence is provided to confirm that the development of 940
--	--

	<p> dwellings will come forward in this plan period. (PSLP2766 Countryside Properties)</p> <ul style="list-style-type: none"> • Phasing and implementation strategy should be part of Local Plan and not Development Plan Document. (PSLP2766 Countryside Properties) • The delivery model of each of the garden communities, their reliance upon land value capture, the delivery of essential infrastructure remains unclear. (PSLP2674 Persimmon Homes) • By the time the DPD is adopted, a planning application determined, the level of infrastructure required it would be highly unlikely that dwellings would start to be completed by 2022/23 (PSLP2916 Village Developments Takeley) • It is not sustainable for only top up shopping needs be met. There is no reference to Country Parks or provision of any significant natural or semi-natural space. PSLP2232 (WeAreResidents.org) • Objections and Issues raised by individual residents. <ul style="list-style-type: none"> ○ Inadequacy of water cycle – with water courses too small and ecologically sensitive to accept discharge so effluent would need to be pumped to other WwTW ○ Detrimental impact on attractive countryside, farmland, woodland, footpaths and bridleways, wildlife and historic assets including archaeology. Detrimental impact on Stebbing Green, Boxted Wood and loss of Andrewsfield Airfield (former World War airfield and currently pilot training school. Landscape and heritage assessments undertaken for the Neighbourhood Plan have been ignored. Development would lead to increase in light pollution and its subsequent impact on wildlife. ○ Policy would lead to development in green buffer separating Stebbing from neighbouring villages and leading to urban coalescence. ○ Development is reliant on A120 improvements for which there is no guarantee. Concerns over the capacity of major and minor roads, A120 / M11 Junction. Insufficient information provided on Rapid Transit System. ○ Concerns whether residents will in fact use public transport. Braintree as the nearest railway station is inadequate. Residents will travel to Dunmow or Braintree for shopping etc by car. Most residents will work elsewhere are travel by car. There could be 4-5 cars per household. ○ No guarantee that employment will come to this development which is the wrong location for many businesses. ○ Insufficient details of the design and layout of the development are shown. ○ Concerns that services such as schools and GP facilities will not be provided early enough. The hospitals will not be fit for purpose. ○ Development is under a flight path from Stansted Airport. ○ Deducting areas inconsistent with national policy and should be protected from development then it is simply not possible to provide for the housing numbers put forward. ○ The financial viability of the GC cannot be demonstrated however by the formation of Development Corporations under new regulations laid down this year, viability could be achieved. No such plans have been presented. ○ The evidence base, including the Sustainability Appraisal, does not justify the policy and there are better and more sustainable options.
--	---

	<ul style="list-style-type: none"> ○ Mineral extraction will affect the delivery of the proposal. This will affect the delivery of the West of Braintree proposal because it will act as a major constraint to the delivery of a new grade separated direct four-way junction onto the A120. Furthermore, it is uncertain whether similar prior mineral extraction and land restoration will be required on the Uttlesford side of the growth location and what implications this could have on the wider phasing of the new Garden Community. ○ The location did not come in response to a strategically and objectively assessed need for housing where employment and transport links would suggest they best be provided but in response to a call for landowners willing to sell. ○ There is no demand for high priced housing in this area. The existing market is stagnating ○ Not clear how providing affordable housing will addressed through the strategy of developing garden communities. ○ Air pollution will significantly increase with the potential of over 50,000 more cars within a 6 mile stretch along the A120 corridor.
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> ● Addition of the words 'around' or 'up to' are inserted before 10,500 -13,500 homes. There may be further work needed to tighten the policy wording and to more accurately reflect the outcome of the HIA once it is finalised. Point 9 should be under Natural Environment. Point 11a and 11b. re-order or re-word to ensure no repetition. Point 11b needs to include a list of key assets 'Including Stebbing, Rayne and Great Saling Conservation Areas, Saling Grove and Saling Hall Registered Parks and Gardens (both grade II)Porters Hall Moated site scheduled monument and a number of listed buildings.' Continue to suggest the inclusion of a concept/strategy diagram to illustrate the main features of the policy in relation to the garden community. It could include access points, location of heritage assets, buffer zones for heritage assets, strategic planting and other key considerations. (PSLP1855 Historic England) ● Move point 9 to be under Natural Environment. <i>Amend point 9 to read To address recreational disturbance / pressure impacts from development on coastal SPAs and SACs, contributions will be secured towards mitigation measures identified in the Essex wide Recreational Disturbance Avoidance and Mitigation Strategy (RAMs) which will be completed by the time the Local Plan is adopted.</i> Policy include a requirement for implementation of any measures identified as necessary, through the Epping Forest MoU study, to address air quality impacts to the SSSI/SAC. The policy should specify a funding mechanism for the delivery of the agreed measures and any measures required to address impacts to the nearby River Ter and Bovington Hall Woods SSSIs. This should be identified through the SA. The policy should include requirements for development to provide a metric to demonstrate net gains for biodiversity and green infrastructure. In line with paragraphs 170 and 172 of the NPPF, we advise that the WBGC should ensure protection and enhancement of the landscape which may be valued locally. We recommend that the relevant South Suffolk and North Essex Clayland (86) National Character Area (NCA) profile which has been produced by Natural England is referred to for further information.

	<p>The policy should also promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity, in accordance with paragraph 174 of the NPPF.</p> <p>The policy should include explicit requirements for development to protect best and most versatile agricultural land in accordance with paragraph 170 of the NPPF. (PSLP2455 Natural England)</p> <ul style="list-style-type: none"> • The wording of second paragraph under the heading utilities should be amended to refer to an upgrade for sewage treatment at the receiving WRC. It should also be consistent with the wording of any changes made to Policies SP6 and SP7 as the wording of this policy differs somewhat from these policies. (PSLP999 Anglian Water) • To be effective it is suggested that Policy SP8 is amended to include reference to an upgrade of sewage treatment and be consistent with any changes to Policies SP6 and SP7 (PSLP2515 Anglian Water) • Braintree would like to work with Uttlesford to allocate an employment floor space requirement for the West of Braintree Garden Community. The associated inset map for West of Braintree should include an area of land between Boxted Wood and Andrewsfield. Braintree District Council within the area of search, as this will provide maximum flexibility for the location of the built development within the area of search, and for appropriately landscaped buffers and open space to neighbouring settlements. (PSLP2058 Braintree DC) • Include employment floorspace allocation and/or employment land requirements. (PSLP882 ECC) • Additional or amended paragraphs 4/5 “Provide linkage of green infrastructure to the wider public realm to create green corridors and to improve accessibility for all and develop new links, utilising other components of urban greening” (PSLP885 ECC) • Change paragraph 18 to read: ‘Enhance wider green infrastructure and networks including its maintenance, as well as the maintenance and enhancement of existing watercourses, ponds and lakes within the site.’• Include an additional bullet point as follows: ‘Demonstrate the environmental net gains, and where there is a net loss from the development to provide provisions through offsetting.’ (PSLP888 ECC) • paragraph 9 of Policy SP 8 appears under the ‘Natural Environment’ heading rather than the ‘Historic Environment’ heading.(PSLP901 ECC) • Point (4) should be amended along the following lines: Provide allotments, open space, sports facilities, play, leisure and recreation in line with the most up-to-date Sports Strategy, standards established in the Local Plan, the Essex Design Guide and the Strategic Growth Development Plan Document. (PSLP65 Sport England) • The exact nature and scale of mitigation required to meet augmented needs of proposed developments will be calculated at an appropriate time, as and when schemes come forward over the plan period to realise the objectives of the Local Plan. This is based on current configuration of health care services and is subject to change. Anticipated Impact: New Primary Care facility required in Felsted. (PSLP2582 West Essex Clinical Commissioning Group) • Felsted Parish Council remains against the West of Braintree (WoB) development, primarily due to the impact of traffic through Felsted, the lack of infrastructure and the lack of natural resources. We believe that it is unsustainable.
--	---

	<p>UDC are completely beholden to the North Essex Garden Partnership (NEGC) for delivery of the West of Braintree (WoB) new town which the Government Inspector has found the NEGC plan ‘unsound’. Given the NEGC Plan rejection it is not possible for UDC to know, in time for the UDC Plan submission, in what form, when, or even if, the WoB development will be progressed by NEGC. It is therefore unsafe, and risks the Plan being found unsound, to include WoB in housing delivery calculations for the current plan period. The area proposed for the WoB development is directly overflowed by incoming planes, 24 hours a day, for runway 4 at heights of lower than 7000 ft. It is also overflowed by runway 4 departures at 4-7000 ft as they vector north from the NPR. This means that this area is not an acceptable location for a major housing development. (PSLP731 Felsted PC)</p> <ul style="list-style-type: none"> • Policy SP8 should be deleted from the Draft Plan, together with all associated references within it to the West of Braintree Garden Community. (PSLP2205 Stebbing PC) (PSLP3007 Stebbing Neighbourhood Plan) • Amend policy to include all users and all new routes are created as multi-user routes accessible to all vulnerable road users including equestrians, (PSLP401 Essex Bridleway Assoc; PSLP401 British Horse Society; PSLP627 Fritchway Action Group) • Amend policy to ensure that the ancient woodland within it is protected and given adequate buffering from any surrounding housing or other development. (PSLP819 Woodland Trust) • The plan needs to specifically address how it has been developed in respect of the emerging national aviation policy and also the airspace modernisation strategy. Remove requirement 6 unless there is appropriate and proportionate evidence base to justify policy requirement In respect of aerodrome safeguarding matters, given the issue is a repeated risk across a number of elements, it is considered that an overarching caveat is inserted into the introductory paragraphs of the main policy text. For example: “ <u>The DPD, and any future planning applications, will also demonstrate how aerodrome safeguarding considerations have been incorporated into the overall design of the new garden community to ensure that any development does not impact upon the safe and efficient operation of aircraft at or in the vicinity of London Stansted Airport</u>”. (PSLP1514 Manchester Airport Group) • Further allocations need to be made (PSLP2674 Persimmon Homes) (PSLP2751 Crown Estate) (PSLP2866 Trustee of N Streeter Will Trust) (PSLP2916 Village Developments Takeley) such as <ul style="list-style-type: none"> ○ land south of Beldhams Lane Bishops Stortford. (PSLP188 Bloomhall) ○ land north of Stansted Mountfitchet (PSLP902 Bloor Homes) (PSLP2900 Martin Grant Homes & Bloor Homes) ○ Land at Elsenham (PSLP2785 Fairfield Elsenham) • Remove policy from plan (individual residents)
<u>Policy SP9 Development Within Development Limits</u>	
SUPPORT	1
OBJECT	9
SUMMARY OF REPRESENTATI	<ul style="list-style-type: none"> • Welcome the addition of a reference to the significance of heritage assets (PSLAP1857 Historic England)

ONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Policy does not support alternative uses on land. NPPF confirms a positive approach to the reuse of existing allocations to address an identified need (para 22 NPPF 2012; Para 120 NPPF 2018). (PSLP1662 The Joint Administrators of Pulse Packaging). • Policy omits a number of material considerations on air pollution and traffic congestion. (PSLP2233 We Are Residents) • Natural England welcomes acknowledgement that development should be 'compatible' with the natural environment. However, we would prefer a requirement for development to protect and enhance the natural environment, and deliver net biodiversity gain in accordance with the NPPF and the Defra 25 Year Environment Plan.(PSLP2456 Natural England) • Object to first criterion as it provides an unnecessary barrier to delivering development within development limits that is unsubstantiated by the evidence provided and risk preventing sustainable development. (PSLP2835 Endurance Estates; PSLP2897 Grant and Bloor) • Opportunities have been missed to amend settlement boundaries to allocate additional sites that could assist in meeting housing needs, and contribute to the vitality of settlements whilst avoiding unacceptable landscape impacts. (PSLP2989 Richard Coke; PSLP2997 Landhold Capital Ltd) • Policy does not safeguard neighbours from the environmental impact of development. (PSLP426 Richard Walford) • Whilst there is a basic distinction between the 'within' and 'without' development type settlements, there is no justifiable reason for the wording for the criteria, in Policy SP9 and Policy H5, which deal with the same issue to vary. (PSLP2153 Henham PC)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • The Policy should be amended to reflect the more flexible approach taken by the NPPF towards the reuse and redevelopment of allocation sites where there is no reasonable prospect of those sites being used for the use allocated. <ul style="list-style-type: none"> ○ policy should be amended as follows: "<i>Development will be permitted on land within development limits if: 1. It is in accordance with any existing allocation, unless it has been demonstrated that there is no reasonable prospect for the allocated use to be continued on site, and where the proposed redevelopment would contribute to meeting an identified development need.</i>" • (PSLP1662 The Joint Administrators of Pulse Packaging) • new development should not: a. Adversely affect air pollution levels inside an AQMA; b. Increase traffic congestion; c. Have an adverse effect on Conservation Areas or conservation assets, whether by reason of the development itself or the traffic it would generate. (PSLP2233 We Are Residents) • Delete criteria 1. (PSLP2835 Endurance Estate; PSLP2897 Grant and Bloor) • changes should be made to settlement boundaries to allow for further growth of communities and in particular to include the site at Chickney Road, Henham. (PSLP2989 Richard Coke) • changes should be made to settlement boundaries to allow for further growth of communities and in particular to include the site at Mill Road, Henham. (PSLP2997 Landhold Capital Ltd) • Add new para 8:"8. "It minimises the environmental impact on neighbouring properties by appropriate mitigating measures."Revise para 5 to add after the

	<p>words "overshadowing of" the words "or cause material disturbance (whether by noise, light, smell, vibration or otherwise) to" so that it reads "It does not result in any material overlooking or overshadowing of, or cause material disturbance (whether by noise, light, smell, vibration or otherwise) to neighbouring properties." (PSLP426 Richard Walford)</p> <ul style="list-style-type: none"> • Criterion 1. in SP9 is meaningless so should be replaced by: Development outside the development limits is regarded as being in the countryside such that Policy SP10 applies. (PSLP2153 Henham PC) <p>Replace criteria 2-7 with the following which uses the same wording for the same criteria which are common to both 'with development limits and 'without limits' settlements, and should be used in SP2 and H5:</p> <ul style="list-style-type: none"> ○ 2 It would be compatible with the character of the settlement and, depending on the location of the site, its countryside setting and natural environment; ○ 3 The setting of existing buildings, the natural and historic environment (including Listed Buildings, Conservation Areas, Protected Lanes and Preserved Trees), and the character of the area are protected; ○ 4 Development provides adequate amenity space and does not result in an unacceptable loss of amenity space; in accordance with the Essex Design Guide or subsequent guidance ○ 5 There would be no material overlooking or overshadowing of neighbouring properties; ○ 6 The development would not have an overbearing effect or cause disturbance to neighbouring properties; ○ 7 The resulting development would not result in unreasonable noise and disturbance to the occupiers of neighbouring properties from vehicles or any other cause. (PSLP2153 Henham PC)
Policy SP10 Protection of the Countryside	
SUPPORT	2
OBJECT	18
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Natural England supports amendments to the policy, to include separate requirements for the protection of best and most versatile agricultural land and biodiversity, in line with our previous advice, and the SA recommendation for better protection of biodiversity through this policy (<i>Natural England PSLP 2457</i>) • Birchanger Parish Council fully supports the decision to protect the Green Belt within Uttlesford District. It is import to Birchanger residents that the village maintains its rural character and does not merge with other settlements. (<i>Birchanger Parish Council PSLP 34</i>)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Refusal to release Green Belt on land south of Beldams Lane fails to positively plan for development (<i>Bloomhall PSLP 189</i>) • Makes no reference to revised NPPF July 2018; and • SP10 is totally prescriptive in stating that no housing development would be permitted in areas of the countryside whereas the overarching issues of Sustainable Development and due consideration for development adjacent to existing settlement boundaries should be considered in line with the latest national planning policy. (<i>Go Holdings Ltd PSLP</i>)

	<ul style="list-style-type: none"> • Lack of evidence to show that the Green Belt has been assessed on a finer grain than the 2016 Review; • No evidence of how the assessed 31 areas perform in relation to the purpose of including land in the Green Belt; • Protecting the Green Belt in its entirety is a simplistic view of the Green Belt. (Strutt & Parker Farms PSLP 2772) • The policy restricts development in the countryside, agriculture, horticulture, forestry, outdoor recreation and other uses which need to be located in the countryside; and • Additional definition including agricultural, recreational uses and biodiversity in Policy SP10 is considered unnecessary and overly restrictive. (Taylor Wimpey PSLP 2882) • The CPZ Study is too “broad brush” and certain sites can in Takeley and land at Parsonage Lane can be brought forward without undermining CPZ functions; • Current CPZ boundary offers no flexibility and is not justified. (Endurance Estates PSLP 2836) The site is severed from its surroundings by built development and the impact of the proposed development on the CPZ function of preventing changes in rural settlement pattern will be minimal. (Pigeon Investment Management Ltd PSLP 2740). • The plan as currently worded fails to provide sufficient flexibility for future • consideration of opportunities for master-planning of the area around the airport which is a key strategic location in its own right; • The approach currently adopted is not justified or effective as the most appropriate strategy for plan (Legal & General PSLP 2620) • This policy does not sufficiently take into account the ability of previously developed land to accommodate a range of uses, the existing use and character of previously developed sites which may be enhanced through redevelopment or allow for the specific needs of ‘other uses’ to be adequately considered (National Express Ltd. PSLP 2755). • The Local Plan relies on a 2016 review of the Green Belt and fails to adequately assess the need for a further review of the Green Belt in light of the current shortfall of housing land supply and the desire to promote sustainable development and encourage sustainable modes of transport. (Bloomhall PSLP 193) • The plan does not strongly address or give any weight to preserving the countryside. (PSLP 24) • The policy is unduly restrictive and is not consistent with national policy. The draft policy wording is too restrictive and will prevent sustainable development from coming forward (Sworders PSLP 846).
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Amend paragraph 3.121 text to include release of land south of Beldams Lane (Bloomhall PSLP 189) • A finer-grain assessment should be undertaken around settlements in order to differentiate sites in greater detail; • Local Plan to deliver development in Type A Villages including those within the Green Belt by releasing Green Belt in certain locations and stifle development on suitable sites; (Strutt & Parker Farms PSLP 2772) • The policy should be amended by removing reference to value as productive

	<p>agricultural land, recreational land and for biodiversity and the permitted uses defined in the policy because they are not justified. (Taylor Wimpey PSLP 2882)</p> <p>The CPZ boundary should be altered to reflect the opportunities to deliver sustainable development at Takeley where they do not undermine the functions of the CPZ. (Endurance Estates PSLP 2836)</p> <ul style="list-style-type: none"> • The site should be removed from its CPZ designation (Pigeon Investment Management Ltd PSLP 2740). • The final section of Policy SP10 should be amended to acknowledge that development proposed within the Countryside Protection Zone will require careful consideration whilst allowing flexibility for uses that would provide sustainable transport connections or other sustainable land uses offset any environmental harm to the land in its current form (Legal & General PSLP 2620) • Addition of the following criterion, “Within the Countryside, planning permission will be granted for the redevelopment of previously developed land and the re-use of existing buildings in order to make best use of available brownfield land and buildings, thus minimising the need for the development of greenfield sites.” (National Express Ltd. PSLP 2755). • The Green Belt boundary should be reviewed and the land south of Beldams Lane, Bishop's Stortford should be released for residential development given its sustainable location. (Bloomhall PSLP 193) • There should be more evidence of countryside protection in the Local Plan (PSLP 24) • The policy to be amended to read as follows: <ul style="list-style-type: none"> “The Countryside is defined as land outside the development limits and identified new garden communities and consists of: <ul style="list-style-type: none"> ○ The Metropolitan Green Belt ○ London Stansted Airport Countryside Protection Zone ○ Countryside beyond both the Green Belt and the Countryside Protection Zone <p>The Countryside will be recognised for its intrinsic character and beauty, for its value as productive agricultural land, recreational land and for biodiversity. The Landscape character and local distinctiveness of the Countryside will be recognised.</p> <p>Development within the Metropolitan Green Belt as defined on the Policies Map will be assessed against the latest national policy. Development within the London Stansted Airport Countryside Protection Zone as defined on the Policies Map will only be permitted where new buildings or uses of land do not lead to coalescence between London Stansted Airport and existing development and do not adversely affect the open character of the Zone.</p>
--	--

	<p>Within the Countryside beyond the Green Belt and Countryside Protection Zone, development will be permitted where it is supported by other policies in the development plan and will be expected to:</p> <ol style="list-style-type: none"> 1. Recognise the intrinsic character and beauty of the countryside; 2. Protect the best and most versatile agricultural land; 3. Minimise impacts on biodiversity; 4. Focus development in locations with good access to services and facilities (<i>Sworders PSLP 846</i>).
Policy SP11 London Stansted Airport	
SUPPORT	0
OBJECT	31
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Strongly object to the proposal to permit non-airport related B1, B2 and B8 uses on 55 ha of land (North Stansted Employment Area) that was previously safeguarded for airport-related development. (Pigeon Investment Management / Savills; PSLP2737) • Objects on the grounds of Increased number of passenger and flight numbers results in an increase in noise pollution, rise in air pollution and extreme pressure placed on the M11. (PSLP176) • The 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 and must be retained to ensure soundness. (MAG; PSLP1519) • The strategic nature of this policy ambition requires partnership commitment with other transport agencies and this has not been included. A commitment to partnership with the airport from bodies such as the Council and key transport organisations/agencies such as HE, ECC and Network Rail, is required to achieve this aim. (MAG; PSLP1519) • Objects The Reg 19 policy being altered in such a way so as to require the provision of capacity for other journeys (i.e. not air passenger or employee) and also now requires that capacity must be enhanced to accommodate all journeys. It is unclear as to how this policy position has been reached, what the nature and scale of other journeys comprise, what enhancements are required or envisaged (and how they might be delivered so as not to disrupt the primary function of our transport facilities which is to support passenger and employee journeys), or what their impact on the capacity and operation of airport infrastructure might be. (MAG; PSLP1519) • Objects to the requirement of the airport to safeguard land and financially contribute to rapid transport options. (MAG; PSLP1519) • Clause 8 of the policy should recognise that whilst public transport is the most sustainable mode of transport, 50% of passengers will still arrive at the airport by car and Long Stay Parking is the most sustainable solution for this as it halves the number of taxi journey's and kiss & fly. The policy should recognise this position and we object on this basis. . Failure to make provision for sufficient parking could result in adverse local

	<p>transport conditions and nuisance impacts, unlawful development in the countryside and an increase the kiss and fly trips that Clause 8 of the policy seeks to avoid. Our clients support Clauses 9, 10 and 11, as proposed under airport related car parking, as they provide clear and appropriate means against which to assess an application for off-airport parking. (Holiday Extras Limited; PSLP1547)</p> <ul style="list-style-type: none"> • Object to Clause 12 of the policy as currently written as, by definition, off-site airport related parking cannot accord with a Strategic Development Plan (SDP) which includes a core objective of providing all airport related parking on-site. (Holiday Extras Limited; PSLP1547) • In addition, the SDP is only updated intermittently - current targets are only up to 2019 (Holiday Extras Limited; PSLP1547) • There is no mention of the historic environment in this policy (Historic England; PSLP1858) • In addition, the housing policy of the UDC plan does not adequately take into account the impact of the airports air pollution. At Takeley (which is not under the flight paths), aviation exhaust fumes can easily be smelt. (PSLP2337) • With policy SP11 there is no safeguard to stop or prevent a 2nd Runway at Stansted Airport. (Takeley Parish Council; PSLP2458) • Policy provides inadequate protection to the natural environment, including nationally and internationally designates sites through changes in air quality through proposed development. Natural England does not agree with the HRA screening for Policy SP11 and believes that further work is required “ ideally the HRA should be revised once the findings and recommendations of the Epping Forest AA / mitigation strategy have been published. (Natural England; PSLP2458) • Different Growth Scenarios should have been modelled or considered (R4U; PSLP2594) • With regards to the direct public transport link between the airport and Easton Park, the policy does not specify where access is to be provided from. (Landsec; PSLP2610) • We do not agree that the present extent of the Stansted Airport Policy Area is the most appropriate strategy. Land adjoining this area provides potential for strategic development not necessarily directly associated with the airport but to provide for other uses including employment and training/learning opportunities to serve a wider range of interests, utilise the existing infrastructure connections in this location and reduce reliance on Stansted Airport itself to support the economy of the local community. This would also reflect the strategic location in close proximity to the Easton Park community. (Legal & General; PSLP2621) • A further increase in commercial non-airfield related business, proposed for an 18-hectare site North side of the airport, will add to the burden on the local infrastructure. Should such a vast warehousing scheme become reality then the projected growth in traffic volume, published by STAL in their application to expand to 43mppa, is likely to be exceeded. (Stansted Mountfitchet Parish Council; PSLP2630) • Sources of airport jobs growth figures not clarified. (PSLP2657) • There should be greater safeguards in SP11 to restrict airport expansion unless it can be clearly demonstrated that the Spatial Vision is not compromised by any expansion proposal. (Littlebury Parish Council;
--	--

	<p>PSLP2699)</p> <ul style="list-style-type: none"> • We strongly object to the proposal to permit non-airport related B1, B2 and B8 uses on 55 ha of land (North Stansted Employment Area) that was previously safeguarded for airport-related development. Lifting the airport restriction will have consequences for accommodating airport related growth in the future, should the dynamics of the airport change and space be required. (Pigeon Investment Management; PSLP2737) • Designation of the North Stansted Employment Area conflicts with Recommendation 8 of the ELR, which states that the Council should continue to support airport related development within the airport boundary in line with the Airports Sustainable Development Plan (SDP). (Pigeon Investment Management; PSLP2737) • The Local Plan states things like with permission to operate up to 35 mppa, which is forecast by the airport operator to be reached by 2025, a totally unsubstantiated forecast and in conflict with the more professional forecast provided by the CAA of 2035.(EARAG; PSLP2756) • Forecasts are not substantiated by reference to methodologies applied and sensitivity analysis relevant to any conclusions and outcomes. SP11. Previously Manchester Airports Group (MAG) has sought to influence, directly, the wording of this Policy SP11 to the detriment of Uttlesford Residents by weakening its requirements. (EARAG; PSLP2756) • Can the data substantiating the employment claim be reviewed as this is not thought to be correct; Stansted employment of residents/nearby areas is low and not of good quality permanent employment. (EARAG; PSLP2756) • Plan ambition to assist in reducing carbon ambitions from the airport is at variance with the UDC planning officers intent around the expansion of the airport to 45m passengers p.a., as are the noise and air quality ambition in para 3.142.....not practically achievable and should be re-written. (EARAG; PSLP2756) • The section is mostly silent on the impacts of increases in passenger numbers beyond the permitted 35 million ppa. The exception to this is at 3.141 where it is discussed in relation to climate change mitigation. We consider that this leaves the LPA in a weakened position in respect of applications that might give rise to unsustainable impacts for waste water treatment. The section should make clear the assumptions for projected passenger numbers used for the Water Cycle Study once complete as per position statement. Whilst we acknowledge that the issue is alluded to within criteria 4 of the policy, it should be made clearer due to the specific issues of the water environment in the area. We have previously requested additional policy wording at the regulation 18 consultation in our letter dated 8 September 2017 which we remain of the opinion is worthy of inclusion. (Environment Agency; PSLP2923)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Given the discussions around the SATF as part of airport 35+, it would be appropriate to ensure the targets are not only monitored but reported. Change paragraph 3.138 to read: ...will set, monitor and report targets...(Essex County Council; PSLP905) • Paragraph 1, line 4: Replace "incorporates" with "excludes". delete criterion 10:"1.The reference to the SDP Modal Shift Targets should be deleted. Change “Northern Stansted Employment Area” to “North Stansted Employment Area”. Change “Visibility” to “Visibility”. (Stop

	<p>Stansted Expansion; PLSP378)</p> <ul style="list-style-type: none"> • The references to the Stansted Airport Sustainable Development Plan and Stansted Airport Noise Action Plan should be removed. 1: Change para 3.135 2: Correct policy SP11 to comply with objections raised by Stop Stansted Expansion. 3: Policy SP12 - correct line 2 from SEDIGNED to DESIGNED (PSLPS842) • Paragraph 3.138. This is an advisory comment. The paragraph states The London Stansted Area Transport Forum and its working groups will set and monitor targets to deliver an increase in sustainable surface access to the airport.â€• Given the discussions around the SATF as part of airport 35+, it would be appropriate to ensure the targets are not only monitored but reported. Change paragraph 3.138 to read: ...will set, monitor and report targets...•. (Essex County Council; PSLP905) • As per our comments relating to SA1, 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. The approach is not justified. (MAG; PSLP1519) • For Clause 8 of Policy SP11, the following wording is recommended: 8. Incorporate sustainable transportation and surface access measures in particular which, whilst recognising the use of the private car, seek to minimise use of the private car, and maximise the availability and use of sustainable transport modes and seek to meet modal shift targets, all in accordance with the London Stansted Sustainable Development Plan; Clauses 9-15 under Airport-related Car Parking and London Stansted Airport Strategic Allocation should be renumbered Clauses 11-17. For Clause 12 (as currently numbered under Airport Related Car Parking), the wording should be amended following discussion with the Airport Operators to identify the amount of parking that should be provided within the airport each year that helps to meet their SDP target modal split and increased passenger numbers. In years when figures have not been achieved, off-site parking would be permitted, subject to other policies in the Plan. (Holiday Extras Limited; PSLP1547) • Given the strategic nature of this policy, we suggest that reference should be included in this policy to the historic environment (Historic England; PSLP1858) • Paragraphs 3.75 to 3.88 addresses properly the issue of the relationship between the employment it provides and the location of housing needed to support the airport in a sustainable manner. (Eclipse Planning; PSLP2296) • The economic objectives of the Plan should therefore be sought elsewhere through other initiatives and should not be based on Stansted Airport Expansion (Saffron Walden Town Council PSLP2322) • Policy T3 in the 2005 local plan remain which states proposals for car parking associated with any use at Stansted Airport will be refused beyond the airport boundary. (Takeley Parish Council; PSLP2458). • Your authority should ensure that Policy SP11 includes a commitment for development to deliver mitigation to address adverse impacts to Epping Forest SAC through AA, in accordance with the requirements of the Habitats Regulations. A further requirement for development to deliver mitigation to address impacts to other designated sites, such as Hatfield Forest SSSI, Quendon Wood SSSI, Elsenham Woods SSSI and High
--	--

	<p>Dunmow Wood SSSI should also be included. (Natural England; PSLP2458)</p> <ul style="list-style-type: none"> • East Herts Council also requests that an amendment is made to Policy SP11 to include measures to address and avoid the impacts of inappropriate airport-related parking in nearby settlements. (East Hertfordshire District Council; PSLP2503) • The policy should be amended to confirm that the safeguarded access relates to creating a linkage to Easton Park. We consider that the Local Plan policy should include reference to a Compulsory Purchase Order being progressed should this prove necessary. (Landsec; PSLP2610) • Paragraph 1, line 4: Replace "incorporates" with "excludes".(EARAG; PSLP2756) • Airport Development Criteria: Amend criteria 1,3,5,8 to read as follows, and delete criterion 10: <p>"1. They are directly related to the operation of the airport". "3. They are in accordance with the permission granted by the Secretary of State in his decision letter of 8th October 2008 or such other decision letter as may have subsequently been issued by the Secretary of State". 5. Achieve further noise reduction or at least no increase in aircraft noise impacts including ground noise impacts at any time of the day or night." 8. Incorporate sustainable transportation and surface access measures in particular which minimise use of the private car, and maximise the availability and use of sustainable transport Delete criterion 10: Reason: UDC has no control over the Stansted Airport Sustainable Development Plan ('SDP') for Stansted t and so, for example, would not be able to prevent the airport from adopting a SDP which included a second runway. (EARAG; PSLP2756)</p> • Airport-Related Car Parking Paragraph 1, line 3: The term "appropriate mechanisms" is too vague. Clarification is needed (EARAG; PSLP2756) • Delete point 12. Reason: As previously stated, UDC has no control over the Stansted Airport SDP and so cannot be bound by the policies and targets set down therein. (EARAG; PSLP2756) • Implementation and Monitoring of Strategic Projects Reason: To avoid misinterpretation of Policy M2. Paragraph 1, line 2: Replace "London Stansted Airport" with "North Stansted Employment Area".(EARAG; PSLP2756) • The outcome of the completed WCS will further inform SP11 in respect of its assumptions and findings. In the interim no development including growth in passenger numbers will be permitted unless it has been demonstrated by the applicant that either sufficient waste water treatment infrastructure already exists or additional waste water treatment infrastructure can be provided before the development becomes fully operational. (Environment Agency; PSLP2923) • SP11 Point 4 should be amended to accept that Air Traffic movements and passenger numbers will increase. For the Plan to be sound it needs consequential amendment to embrace this expansion and to plan infrastructure accordingly but also plan to mitigate the impact on Uttlesford residents where possible. (PSLP2935)
<u>Policy SP12 Sustainable Development Principles</u>	
SUPPORT	0
OBJECT	11

SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Although SP12 is shown in Appendix 1 as replacing GEN4 , criterion 5 is weak and therefore almost valueless. (PSLP427 Richard Walford) • This policy and text focusses on carbon reduction with no reference to adaption, other than the reference to change in climate and weather patterns (paragraph 3.146). Policy does not include strategies to mitigate and adapt to climate change in line with the Climate Change Act 2008. This includes taking into account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. .(PLSP909 Essex County Council) • Policy does not specifically mention climate change. It should encourage the opportunites from environment through green infrastructure to adapt to climate change. (PSLP910 Essex County Council) • Criterion 4 should refer to historic environment as it encompasses all aspects of heritage. (PSLP1859 Historic England) • The policy ignores the effect on carbon emissions from transport which is the single biggest contributor to Uttlesford’s carbon footprint.(PSLP2235 We Are Residents) • The policy should be given more prominence within the plan as it contains what could be described as core planning principles. Furthermore do not consider that policies SP2-SP11 are consistent with the provisions of SP12. The Garden communities do not constitute the prudent and sustainable management of the District. (PSLP2297 Eclipse Planning Services) • 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.(PSLP2408) • Natural England commends the inclusion of safeguards for the natural environment in this policy but would also like to see reference to ‘enhancement’. All relevant development should be required to deliver net biodiversity gain wherever possible, in accordance with paragraphs 170, 174 and 175 of the NPPF and the aspirations of the Defra 25 Year Environment Plan. A requirement for development to make a positive contribution through habitat creation / enhancement to the Essex Wildlife Trust Living Landscape initiative should be included.(PSLP2459 Natural England) • Criterion 1 is a very general statement and it is unclear in the Policy of the forward what this means in practice. In addition, the plan needs to consider the associated cost of meeting these criteria.(PSLP2675 Persimmon Homes) • Unclear on the purpose of this policy as it seems to include some generic principles which are contained within national policy and/or other policies within this Local Plan.(PSLP2801 Gladman) • Object to criterion 3. Uttlesford has few opportunities for brownfield development, and a degree of greenfield development is inevitable. The sustainability of the site should be judged against suitability of the site and access to services and not whether is brownfield or not. Not building on greenfield sites would result in an inability to meet the District’s development needs. Greenfield land is generally less constrained and less prone to having

	<p>significant abnormal costs through demolition or remediation due to contamination issues. If the intention of the policy is to encourage use of brownfield sites, criterion 2 already sets this out and is sufficient for that purpose. (PSLP2832 Endurance Estates)</p>
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • At the end of sub para 5 of SP12, add: "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. (PSLP427 Richard Walford) • Policy SP 12 should reference the need to ensure the sustainability principles include climate change mitigation and adaptation in the lifetime of the development.(PLSP909 Essex County Council) • Add additional criteria: ‘Using green infrastructure as a way of adapting and mitigating for climate change through the management and enhancement of existing habitats and the creation of new ones to provide multiple functions and benefits” and ‘Provide opportunities for renewable and low energy technologies, including electric vehicle provision;’ (PSLP910 Essex County Council) • Amend criterion 4 to refer to retaining and enhancing the historic environment. (PSLP1859 Historic England) • Address the effect of carbon emissions from transport in policy and supporting text. Text should note that the 2011 Local Authority statistics showed that 59% of Uttlesford’s carbon footprint was attributable to transport.(PSLP2235 We Are Residents) • Merge with Policy SP1 (PSLP2297 Eclipse Planning Services) • Include reference to ‘enhancement’ of natural environment. All relevant development should be required to deliver net biodiversity gain wherever possible. A requirement for development to make a positive contribution through habitat creation / enhancement to the Essex Wildlife Trust Living Landscape initiative should be included.(PSLP2459 Natural England) • Delete criterion 3 (PSLP2837 Endurance Estates)

Uttlesford District Council Regulation 19 Pre-submission Local Plan; Summary of Responses	
Section / Paragraph / Policy	Summary of Responses
4. Housing	
SUPPORT	1
OBJECT	21
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Uttlesford should not be meeting the housing needs of London (PSLP43 R Shaw) • No evidence that UDC will listen to representations (PSLP212 J McDonald) • Current new housing does not offer enough houses at low cost and planned further housing appears to also concentrate on high cost homes. (PSLP648 J Capon) • NUGC is not in the right location in the District to fulfil the needs of Uttlesford's housing waiting list (PSLP727 B Linford) • The housing targets which UDC uses to justify the 3 Garden Communities are based on old statistics for projected employment growth at Stansted Airport, growth of Chesterford Research Park and Uttlesford population growth generally.(PSLP730 B Linford) (PSLP1843 J Lynch) (PSLP2077 G Matthews) (PSLP2082 G Benn) (PSLP2090 J Luke) (PSLP2107 S Wilkinson) (PSLP J Peden) • The Strategy of Garden Communities and Easton Park GC is inappropriate because of the special rural character of Uttlesford. (PSLP758 Cogger-Berry) • Residents will not benefit from land gains (PSLP827 A Armstrong) • Is the right type of housing being planned for (there is a lack of low cost,affordable property) and concerned about impact of development on services and facilities. (PSLP1047 Mr & Mrs Winter) • Paragraph 4.27 - the establishment of Community Land Trusts to deliver truly affordable housing is strongly urged. (PSLP2037 Sustainable Uttlesford) • there are no minimum space requirements for new homes (PSLP2243 We Are Residents) • The Plan has not taken into account the wider array of tenures as set out in the revised NPPF (PSLP2776 Rentplus • The reference in paragraph 4.23 to specific split between tenure and size is unnecessary and suggests an inflexible approach contrary to national planning policy. The reference to clusters of 10 units is considered overly onerous, as it would give rise to management issues for the affordable housing provider, particularly on larger sites. (PSLP2562 Bovis Homes) • The policy and text makes no reference to NPPF18 paragraph 77 and glossary (PSLP2157 Henham PC) • Paragraph 4.46 does not reflect the most up to date position regarding the ECC Independent Living Programme and refine terminology. (PSLP911 ECC)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Put the true needs of local people first. Build care homes and sheltered accommodation. (PSLP43 R Shaw)

	<ul style="list-style-type: none"> • Associated infrastructure must be developed to avoid negative impact on current and future residents (PSLP648 J Capon) • Opportunities for rural exception sites and opportunities for villages to grow and thrive should be supported (PSLP758 Cogger-Berry) • New policy on minimum space requirements for new homes. (PSLP2243 We Are Residents) • Para 4.24 should be re-worded to work on the assumption that development is in all cases viable, and that viability studies commissioned by developers to prove unviability should be the exception not the norm and should be tested thoroughly. (PSLP2325 Saffron Walden Town Council) (PSLP2942 Saffron Walden and Little Walden Neighbourhood Plan group) • Amend paragraph 4.23 in relation to its tenure split to reflect new tenure categories of affordable housing for rent and other affordable routes to home ownership. • Paragraph 4.23 Delete reference to the tenure split of 71% affordable rent or social rented tenure and 29% shared ownership or intermediate housing tenure. Amend to clusters of 15 dwellings. • Modify paragraph 4.26 to include “the NPPF makes the following additional restriction which are endorsed in this Plan: these are “small sites” which would be used for affordable housing “in perpetuity” where some market housing is required and that would have to be proven in a viability assessment. Viability Assessments are now to become fully publicly available (NPPF July 2018 para 57).” (PSLP2157 Henham PC) • Change paragraph 4.46 to read “Uttlesford has an ageing population which has clear implications for the future delivery of housing over the Local Plan period. Essex County Council (ECC) is the provider of social services in the District. ECC’s approach to Independent Living encourages 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, in 2016 ECC assessed a need for 159 units to enable older people to live independently within the community by 2020. This provision is in addition to the requirement for sheltered housing and any other appropriate housing and support options. The need for Independent Living is set out in ECC’s Independent Living Position Statement (2016). ECC will update its assessment of demand for specialist accommodation during 2018. 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.”
Policy H1 Housing Density	
SUPPORT	2
OBJECT	10
SUMMARY OF REPRESENTATIONS IN	<ul style="list-style-type: none"> • We anticipate that garden community densities will be covered in

SUPPORT	<p>the DPD to be prepared for each. For West of Braintree the Braintree portion proposal is an average of 35 dwellings per ha and it is logical for the Uttlesford Plan to be consistent. (PSLP778 Galliard Homes)</p> <ul style="list-style-type: none"> • The density ranges are appropriate and reflect Government policy concerning efficient use of land and boosting housing supply.(PSLP908 Springfield Planning)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • The upper limit of the proposed housing densities is too high compared to comparable English regions.(PSLP684 Cllr R Freeman) • The proposed housing densities are too high and lead to poor design and lack of open space. It is not clear how these densities are compatible with garden community principles. (PSLP2239 We Are Residents) (PSLP3009 Cllr P Lees) • A blanket policy on density does not take into account the unique character of each area (PSLP2357 Takeley PC) • The policy is overly restrictive in seeking an upper range for housing density. The revised NPPF (2018) indicates that this policy does not comply with Government’s latest intentions in respect of housing densities. (PSLP2560 Bovis Homes) • Policy does not refer to Garden Communities (PSLP2612 Land Securities). • Density figures quoted appear rather arbitrary (PSLP2676 Persimmon Homes) • Policy should be omitted from the plan as suggesting densities of 30 to 50 dwellings per hectare could negatively impact the high quality and layout of development in the District as such densities within or adjacent to a settlement are unlikely to reflect the local context. (PSLP2764 Pegasi Management) • Policy is too restrictive and does not allow sufficient flexibility to adapt proposals to suite the particular local area. (PSLP2802 Gladman) • The policy is not backed up by any evidence. (PSLP2889 Taylor Wimpey)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Amend policy to say “upto” the number of dwellings per hectare. (PSLP2357 Takeley PC) • policy is reworded so that reference to a minimum housing density (PSLP2560 Bovis Homes) • Policy should be amended so that the new Garden Communities are expressly excluded from the policy, with housing density being addressed via the DPDs, or failing this, the same density range as for the major towns, Saffron Walden and Great Dunmow, should be applicable.(PSLP2612 Land Securities) • Housing density should be design led, supported by the NPPF’s requirements for quality design(PSLP2764 Pegasi Management) • Amend policy by removing the table. (PSLP2889 Taylor Wimpey)
Policy H2 Housing Mix	
SUPPORT	3
OBJECT	8
SUMMARY OF	<ul style="list-style-type: none"> • In planning for new garden communities, the Local Plan is entirely

<p>REPRESENTATIONS IN SUPPORT</p>	<p>consistent with paragraph 72 of the NPPF. Part c) is especially relevant here as by following garden city principles it is recognised as a means of ensuring that a variety of homes to meet the needs of different groups in the community will be provided. (PSLP779 Galliard Homes)</p> <ul style="list-style-type: none"> • the policy does not seek to prescribe a rigid housing mix across the District and recognises that there are different areas with different housing needs across the District and that the Council will assess schemes having regard to local character, significance of heritage assets and the viability of the development on a site by site basis. (PSLP2561 Bovis Homes) (PSLP2830 Gladman)
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • We need to focus on 1, 2 and 3- bedroom houses; not the 4- and 5- bed mansions which encourage people to move into the district from outside, and which are utterly useless for ordinary people who grew up here. The large houses potentiate a move to 'Homes in Multiple Occupancy', as a way to mitigate the inadequate supply of smaller properties.(PSLP688 Cllr R Freeman) • There is no information on the model used in the SHMA to provide this mix of house types or that it takes into account local considerations. (PSLP751 Elsenham PC) • Para 4.2 claims that the greatest need is for 3 and 4 bedroom homes but this is contrary to paras 2.7 and 4.4 which refer to increasing single-occupancy need for older persons and also contrary to conclusion by Braintree DC that households with three or more dependent children would fall between 2013 and 2037 in all 4 districts within its SHMA.(PSLP895 K McDonald) • Disagree with the conclusions drawn from the SHMA and believe that 2 and 3 bedroom houses should be prioritised for market housing as well. (PSLP2240 We Are Residents) (PSLP2323 Saffron Walden TC) (PSLP2409 Littlebury PC) (PSLP2941 Saffron Walden and Little Walden Neighbourhood Plan Group) • There is no clear policy steer about the desired mix of housing to be built in Uttlesford during the Plan period. Without firm guidance, developers will continue to build for the upper end of the market rather than smaller units that younger people require to get onto the housing ladder.(PSLP2986 Uttlesford Liberal Democrats Local Party)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Reword the Policy to read: New housing developments will provide for a mix of house types and sizes to meet the different needs of the local area and the District as a whole, having regard to local character, significance of heritage assets and the viability of the development, which will be assessed on a site by site basis in consultation with town councils, parish councils and other interested parties. Assess all policies which draw on the ORS Housing Model. (PSLP751 Elsenham PC) • Policy should clarify the forecast needs for various types and size of housing and explain how this is due to be met. (PSLP895 K McDonald) • Delete emphasis on 4 bedroom homes. (PSLP2240 We Are Residents) • The policy should state that Policy H2 only applies if a preferred housing mix has not been identified in a respective Neighbourhood

	<p>Plan. (PSLP2240 We Are Residents)</p> <ul style="list-style-type: none"> The Plan should take a more positive approach to providing housing for people of all income levels and should ensure that the majority of new built housing is 2 or 3 bedroom until the market supply is rebalanced. (PSLP2323 Saffron Walden TC)
Policy H3 Subdivision of Dwellings and Dwellings in Multiple Occupancy	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
Policy H4 House Extensions and Replacement Dwellings in the Countryside and the Greenbelt	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> The policy applies to the whole Countryside, development restrictions linking position and size of proposed replacement dwelling to position and size of existing dwelling, which are not appropriate to areas outside the Green Belt, and which exceed those applied by paragraph 89 of the NPPF to Green Belt areas only.
MODIFICATION REQUEST	<p>Alternative Proposed Policy Wording</p> <p>1. Proposals to extend or replace dwellings within the area designated as Countryside or Countryside Protection Zone will be permitted provided that the proposal would not materially increase the impact of the dwelling on <u>is appropriate to the local context of the site</u>, the appearance of the surrounding countryside or the open character of the Countryside Protection Zone by virtue of its siting, scale and height, character and design.</p> <p>2. A replacement dwelling should be positioned on or close to the footprint of the existing dwelling, unless design, landscape, highway safety, residential amenity or other environmental grounds indicate that a more appropriate location on the plot can be justified.</p> <p>House extension and replacement dwellings within the Green Belt:</p> <p>3. House extensions will be permitted which would not result in disproportionate additions to the original dwelling or harm the purposes of the Green Belt; and</p> <p>4. Replacement dwellings should be positioned on or close to the footprint of the existing dwelling and will only be permitted if they are</p>

	<p>not materially larger than the one it replaces.</p> <p><u>4. Replacement dwellings will be permitted provided that the proposal does not harm the purposes of the Green Belt, is not materially larger than the dwelling being replaced, and is otherwise appropriate to the local context of the site and the appearance of the surrounding countryside by virtue of its scale and height. "</u></p> <p>Both within the Green Belt and beyond it account will be taken of the size of the existing dwelling, the extent to which it has previously been extended or could be extended under permitted development rights, and the character of the area."</p>
Policy H5 Residential Developments Without Development Limits	
SUPPORT	0
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • the revised NPPF (24th July 2018) states at paragraph 68. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. (PSLP37 Cllr S Barker) • Experience on the UDC Planning Committee shows that developments in Uttlesford, including those 'outside development limits' seldom have sufficient green open space, and almost never have adequate sports provision. (PSLP689 cllr R Freeman) • Whilst there is a basic distinction between the 'within' and 'without' development type settlements, there is no justifiable reason for the wording for the criteria which deal with the same issue to vary. (PSLP2154 Henham PC) • Policy does not give policy on garden size. (PSLP2241 We Are Residents)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • The following uses the same wording for the same criteria which are common to both 'with development limits' and 'without limits' settlements: New criteria 1 'Development outside recognisable footprint of the settlement is regarded as being in the countryside such that Policy SP10 applies. Replace criteria 1-5 with: 2 It would be compatible with the character of the settlement and, depending on the location of the site, its countryside setting and natural environment; 3 The setting of existing buildings, the natural and historic environment (including Listed Buildings, Conservation Areas, Protected Lanes and Preserved Trees), and the character of the area are protected; 4 Development provides adequate amenity space and does not result in an unacceptable loss of amenity space; in accordance with the Essex Design Guide or subsequent guidance 5 There would be no material overlooking or overshadowing of neighbouring properties; 6 The development would not have an overbearing effect or cause

	<p>disturbance to neighbouring properties; 7 The resulting development would not result in unreasonable noise and disturbance to the occupiers of neighbouring properties from vehicles or any other cause. (PSLP2154 Henham PC)</p> <ul style="list-style-type: none"> • Policy to include specific minimum sizes for gardens in accordance with the Essex Design Guide; and the policy should state the garden space part of Policy H5 only applies if garden size not been identified in a respective Neighbourhood Plan. (PSLP2241 We Are Residents)
Policy H6 Affordable Housing	
SUPPORT	1
OBJECT	8
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Consider that the provision of affordable housing in the Garden Communities will be informed by the general policies of the local plan but the precise requirement will be a product of the special infrastructural and other needs of development at this scale, contained in the relevant DPD.
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Policy does not specify number of affordable houses in a cluster as described in paragraph 4.23 (PSLP321 Elsenham PC). • Affordable housing at WoBGC would be situated directly beneath the main take-off flight path at Stansted Airport. (PSLP749 Mrs Roe) • Policy H6 is at odds with the Monitoring Framework Appendix 2 target for affordable housing. Policy H6 requires 40% affordable housing, which with an annual housing requirement of 640 new homes equates to 256 affordable homes per annum. The target for objective 1a is only 150 affordable homes per annum, and therefore should be amended to 256. (PSLP2242 We Are Residents) • In the new settlements at least, it should not be necessary to agree less than the target 40% proportion of new developments being social housing. Priority should be given to local residents who do not wish to move away from their local area.(PSLP2410 Littlebury PC) • Missed opportunity by not referring to starter homes. Policy does not make it clear how evidence on viability of sites will be assessed. Do not consider Council's whole plan viability to be effective in supporting its policy on affordable housing. (PSLP2677 Persimmon) • Policy does not reflect widened definitions of affordable housing. (PSLP2780 Rentplus) • There does not appear to be any real strategy on how to make the 40% of houses really affordable. There is no real evidence that key workers for example will be able to afford to buy/rent these. This is an expensive housing area and how to identify real need is not apparent in the plan. (PSLP3010 Cllr Lees) • The Council's assessment of affordable housing need is flawed because it limits those in need to those on the most acute need, ignoring large groups, which are also likely to be in need. The affordable housing need is therefore likely to be a significant underestimate. It remains unclear on whether the 40%

	requirement for affordable housing is supported by sufficient evidence (PSLP2804 Gladman)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Prescribe a maximum cluster size of 10 for affordable housing (PSLP321 Elsenham PC) • To reflect the new definitions of affordable housing and to ensure the policy is sound, being compliant with national policy, we recommend the below amendments: The tenure mix of affordable housing should reflect <u>the national definitions of affordable housing including housing for rent and routes to home ownership, and</u> the most up to date local housing need evidence and viability on individual sites. • Delete final paragraph. (PSLP2780 Rentplus)
<u>Policy H7 Affordable Housing on Exception Sites.</u>	
SUPPORT	0
OBJECT	8
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Object to the policy allowing the inclusion of market housing as it leads to larger developments than necessary, conflicts with other parts of the plan and abuse of the policy allowing development in unsuitable locations. (PSLP1366 Ms E Ross) (PSLP2026 Hands off Thaxted)(PSLP2124 R Haynes) (PSLP2124 N Weakley) (PSLP3014 L Rulten) • It is accepted nationally that a Parish Housing Needs survey, carried out by a Rural Housing Enabler has a 'shelf life' of five years.(PSLP1712 English Rural Housing Association) • Parish and town councils should be consulted on exception sites before planning applications are made.(PSLP2327 Saffron Walden Town Council) (PSLP2943 Saffron Walden and Little Walden Neighbourhood Plan Group)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • No development on Exception Sites should be allowed on sites specifically identified within the Neighbourhood Plan as not to be developed. (PSLP1366 Ms E Ross) • Amend policy to refer to a housing needs survey being prepared within the last 5 years instead of 3 years. (PSLP1712 English Rural Housing Association) • Policy H7 should be amended so that reference to market housing is removed and affordable houses could still be built in areas outside the development limits but would only be allowed where it was funded by a housing association as already (PSLP2026 Hands off Thaxted) (PSLP2124 R Haynes) • Policy amended allowing only sites identified in Local Plans or Neighbourhood plans. (PSLP2127 N Weakley) (PSLP3014 L Rulten) • Wording of Part 4 of the policy should be amended to ensure that the viability assessments are open book and that the specialists conducting the assessments will be agreed by the council. (PSLP2327 Saffron Walden Town Council) (PSLP2943 Saffron Walden and Little Walden Neighbourhood Plan Group)

Policy H8 Self-Build & Custom Housing	
SUPPORT	0
OBJECT	9
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Policy does not define what is meant by 'Strategic Sites'. (PSLP805 Carter Jonas) • Object to policy requiring unsold sites being offered to the local authority to deliver additional affordable housing. (PSLP805 Carter Jonas) (PSLP2525 HBF) (PSLP2614 Land Securities) (PSLP2678 Persimmon) (PSLP2805 Gladman) • Marketing time period of 3 years is excessive and could lead to undeveloped plots within completed sites or sites nearing completion. (PSLP805 Carter Jonas) (PSLP2678 Persimmon) • The policy supports self-build plots but fails to provide a number, which effectively means that they will not be brought forward. (PSLP2329 Saffron Walden TC) (PSLP2944 Saffron Walden and Little Walden Neighbourhood Plan group) • Policy does not help deliver the number of Self /Custom build homes being suggested by the Register.(PSLP2838 St Edmunds Lane Management) (PSLP2878 EA Securities)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Policy H 8 be amended to confirm the definition of strategic sites. The policy should also be reworded to clarify that it is only those self-build plots being delivered as part of the affordable housing offering that first need to be offered back to the Council before being released to the open market. And finally the required period of marketing should be capped to 18 months. (PSLP805 Carter Jonas) • The previous draft of the Local Plan specified 5% of plots on major development should be allocated to self-build and the Town Council would like to see this figure added back in. (PSLP2329 Saffron Walden TC) (PSLP2944 Saffron Walden and Little Walden Neighbourhood Plan group) • The following changes to proposed policy H8 should be made: 'Self and Custom Build proposals will be supported where they seek to address the need and demand for self and custom build housing and: 1. The site is located within outside of, but adjacent to development limits; 2. Are of high quality design and accord with plot passports (where appropriate); 3. Are constructed sustainably and are energy efficient; and 4. Do not conflict with other policies in the Local Plan. Self and Custom Build proposals will be supported as part of the Garden Communities and strategic sites.' (PSLP2838 St Edmunds Lane Management) • Policy H8 is amended as below: 'If Self or Custom Build plots are not sold after being marketed appropriately for 2412 months, then they should remain on the open market as Self or Custom Build plots or be offered to the Council as land to deliver additional affordable housing. If there is no interest from the above after a further 12 months then the developer can build out the site as open market housing.'(PSLP2525 HBF)(PSLP2678 Persimmon)

	<ul style="list-style-type: none"> • Policy is reworded, so that this requirement only relates to sites that have not delivered 40% affordable housing, and is subject to viability testing. If the sites are to be offered at residential land value, this has different implications to a discounted offer, and therefore needs to be clarified in order to establish if the policy could be made sound.(PSLP2613 Land Securities) • Amendment to Policy H8 (Self-Build and Custom Units): Point 1 to be amended to 1. The site is located OUTSIDE OF, BUT ADJACENT TO development limits;
Policy H9 Sites for Gypsies, Travellers and Travelling Showpeople	
SUPPORT	0
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Criterion 1 is unacceptable and discriminatory because no such pre-requirement would be imposed on a traditional housing application. Criterion 6 is unreasonable in requiring connection to mains drainage.(PSLP2443 National Federation of Gypsy Liaison Groups) • As the GTAA reports that there is no need for additional pitches for households which meet the definition, there is no basis therefore to suggest that provision should be made for households that meet the definition, or even households which do not meet the definition. Policy should make clear that in ‘adequately demonstrating a need’ this is on the same basis that the assessment was made in the GTAA (ie fulfil PPTS definition and no other sites within or outside the District available).Criteria 2 and 4 are related and should be combined (PSLP2158 Henham PC)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Delete criterion 1 and omit drainage from criterion 6. .(PSLP2443 National Federation of Gypsy Liaison Groups) • para 4.43 - delete <i>“a need for up to 8 additional pitches for Gypsy and Traveller households that may meet the planning definition; and a need for 10 additional pitches for Gypsy and Traveller households who do not meet the planning definition.”</i> para 4.43 - add “in order to meet criterion 1 pf Policy H9 applicants must demonstration of need must be on the same basis that assessment was made in the GTAA i.e. that the applicant fulfils the PPTS definition and that after a fully documented survey there are no other sites available (which may involve also looking outside the District boundary)”. <p>Policy H 9 - combine criteria 2 and 4 :</p> <p>The site is located in a sustainable location, well related to a settlement with a range of services and facilities, including a primary school and healthcare facilities; and that the site has safe pedestrian access to those services and facilities, including a primary school. There must also be adequate vehicular access to and from the public highway and the site must provide adequate space for parking, turning and servicing. (PSLP2158 Henham PC)</p>

Policy H10 Accessible and Adaptable Homes	
SUPPORT	0
OBJECT	14
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • No evident strategy that the objective of the policy will be achieved. (PSLP331 Elsenham PC) • Policy in conjunction with Policy H2 does not address the needs of Uttlesford’s ageing population, and creates a shortage of new private housing bungalows (PSLP738 S Johnson) • Object to requirement in policy for dwellings to meet M4(2) Category 2 and Category 3 M4(3)). Policy does not comply with PPG paragraph 56-007 and 009. (PSLP1983 McCarthy and Stone) (PSLP2526 HBF) (PSLP2563 Bovis Homes). (PSLP2614 Land Securities) (PSLP2806 Gladman)(PSLP2885 Taylor Wimpey)(PSLP2905 Grant and Bloor) (PSLP2679 Persimmon) • Policy should ask for 15% for both market and affordable housing to meet Category 3 (M4(3)) requirements. (PSLP2332 Saffron Walden Town Council) (PSLP2945 Saffron Walden and Little Walden Neighbourhood Plan Group) • Policy H10 fails to recognise that ageing households may wish to remain in the place they currently live. Whilst the policy recognises housing design requirements, it lacks location requirements.(PSLP2748 Pegasi Management)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Consult parish councils concerning provision of housing for the elderly. Make provision for a strategy which ensures that adequate housing for the elderly is available. Make the HAPPI principles generally available. Ensure more bungalows are built, particularly private bungalows. Delete the words ‘or financially viable’. (PSLP 331 Elsenham PC) • The strategy and policy that determines the current 5% bungalows target should be re-examined and either the target level be raised to a higher level (say 7 - 10 %), or an alternative, more flexible and innovative methodology and policy is found that will provide more bungalows, particularly an increase in privately-owned bungalows.(PSLP738 S Johnson) • Deletion of reference to ‘10% of market housing and 15% of affordable housing will be required to meet Category 3 (M4(3)) requirements (Wheelchair user dwellings)’. (PSLP1983 McCarthy and Stone)(PSLP2526 HBF) (PSLP2563 Bovis Homes)(PSLP2614 Land Securities))(PSLP2905 Grant and Bloor) (PSLP2679 Persimmon) • Amend policy ‘New housing must be designed and constructed in a way that enables it to be adapted to meet the changing needs of its occupants over time. For this reason the Council requires all new housing on sites of 11 or more dwellings (market and affordable) to meet the optional Building Regulations Requirement M4(2): Category 2 (Accessible and Adaptable Dwellings), <u>where there is an identified need</u>. 10% of market housing and 15% of affordable housing will be required to meet Category 3 (M4(3))

	<p>requirements (Wheelchair user dwellings). (PSLP2885 Taylor Wimpey)</p> <ul style="list-style-type: none"> • Policy should ask for 15% for both market and affordable housing to meet Category 3 (M4(3)) requirements. (PSLP2332 Saffron Walden Town Council) (PSLP2945 Saffron Walden and Little Walden Neighbourhood Plan Group) • As the District is predominately rural it should be considered that an additional Rural Exception Policy is included to allow developments of accessible and adaptable dwellings on sites that are well related to but beyond any settlements.(PSLP2748 Pegasi Management)
--	---

Uttlesford District Council Regulation 19 Pre-submission Local Plan; Summary of Responses	
Section / Paragraph / Policy	Summary of Responses
Policy H11 Specialist Housing	
SUPPORT	1
OBJECT	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Supports policy as a mechanism of securing specialist accommodation such as care facilities. (PSLP2825 Endurance Estates)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Policy does not ensure that specialist housing will in fact be provided.(PSLP284 Elsenham PC) • The Policy and supporting text now proposed is not an encouraging policy but one that is criteria led, and some of those criteria may have a negative effect on provision and is therefore not positively prepared, justified and effective (PSLP1983 McCarthy and Stone) • Local Plan could elaborate of the proposed policy in relation to the provision of specialist accommodation for older people.(PSLP2807 Gladman)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Include a policy which will ensure that specialist housing will be provided. (PSLP284 Elsenham PC) • Replace policy with <i>“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 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.”</i> If policy remains criteria 2 and 3 should be deleted. Remove reference in paragraph 4.49 to 10 HAPPI principles and

Statement of Consultation
Summary of Reg 19 Representations Chapter 4 Housing

	delete “and whether the units are self-contained” (PSLP1983 McCarthy and Stone)
Policy H12 Agricultural / Rural Workers Development	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	

Uttlesford District Council Regulation 19 Pre-submission Local Plan; Summary of Responses	
Section / Paragraph / Policy	Summary of Responses
5. Employment	
SUPPORT	1
OBJECT	8
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Paragraph 5.50. The siting of employment land should be carefully considered so that it is readily accessible to the transport system and to living areas. (Sustainable Uttlesford; PSLP 2039).
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Setting two new Garden Communities (approximately an additional 40,000 residents) will increase the demand for well paid, high end jobs that do not exist in the numbers required. Simple office jobs and jobs in retail will not be sufficient to sustain these communities which will be reliant on commuting to other centres. Increase in pollution and increased levels of traffic on an already strained infrastructure. Majority of Stansted Employees reside outside of the district. No Guarantee that Stansted Airport will expand given current uncertainties. Parking implications at The Airport. People will not live in the area if there is not enough employment. Paragraph 5.6 & 5.52 Existing Employment Areas; Intention is to promote industrial uses (B & Sui Generis) in existing employment areas but not to prevent existing non-industrial uses expanding or to confine future changes in their use only to industrial use categories. In order to be consistent with policies EMP1 and EMP2, and acknowledge that complementary existing uses, including non-industrial and sui generis uses, contribute to the aims of the plan in designated employment areas, it is requested that the text is revised. (Aldis of Barking; PLSP2209 & 2215) Most of the jobs in Uttlesford are filled by residents who live outside of the district and most Uttlesford residents out commute for work – nothing in the evidence base to suggest that this will change. (weareresidents.org; PLSP2244) Paragraph 5.14 mentions is made in paragraph 5.14 of a preferred scenario for jobs growth that would result in a figure of 16,000 additional jobs in Uttlesford over the plan period. estimates of future employment by the airport owners are notoriously optimistic and it is not clear how the figure of 10,000 jobs was calculated. This would indicate that the jobs growth figure at the airport over the Plan period would only be the region of 700 - 2,300. This, in turn, would lead to an employment deficit for the SHMA area of over 10,000 jobs one of the basic rules for garden settlements is that sufficient jobs must be created to match the number of dwellings, typically

	<p>one per new household. There is clearly a very material deficiency of new employment that the draft Local Plan fails to even acknowledge.</p> <ul style="list-style-type: none"> • Many of the employment sites identified are small. Identifying larger potential employment sites should be a priority to attract larger businesses and a greater range of employment. (Littlebury Parish Council; PLSP2314) • 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. (Littlebury Parish Council; PLSP2314)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Paragraph 5.50 The siting of employment land should be carefully considered so that it is readily accessible to the transport system and to living areas. (Sustainable Uttlesford; PSLP 2039) • PARAGRAPH 5.52 This paragraph provides an introduction to Policy EMP2 and its objective, as defined by Point 8 of EMP1, is amended to address the manner in which proposals for locating non-employment uses on existing industrial estates will be assessed. This approach accords with national and local planning policy, which has to-date allowed for expansion of the established use on the Hoblongs employment area and provision of an A3 restaurant, thus securing employment generation within the area. Again, in order not to be unduly restrictive towards existing established Non-B class uses which make an important contribution to existing employment areas, we would suggest that the text is revised. (Aldis of Barkingside; PSLP 2215) • Revise paragraph 5.6 to include the following sentence after the fifth bullet point: However, employment land can also contain existing sui-generis and non-industrial, employment generating uses which complement existing B-class uses and make a contribution to employment provision, promoting the aims of sustainable business growth within the District (Aldi's of Barkingside; PSLP 2209) • No specific figures for the amount of employment land or floor-space to be provided at each of the communities. He considered it was inappropriate to delegate this role to the individual DPDs. (Galliard Homes; PLSP 781) •
Policy EMP1 Employment Strategy	
<p>SUPPORT</p>	<p>7</p>
<p>OBJECT</p>	<p>19</p>
<p>SUMMARY OF REPRESENTATIONS IN</p>	<ul style="list-style-type: none"> • Supportive of 5.40 and EMP 1 which confirms that the new

<p>SUPPORT</p>	<p>Garden Communities will provide a range of B Class employment uses (Andrewsfield New Settlement Consortium (ANSC); PSLP 2011)</p> <ul style="list-style-type: none"> • Supportive of the delivery of ultrafast, high speed broadband to all businesses and homes within the development to facilitate home working and reduce the need for travel (ANSC; PLSP2011) • LtCHE1 Supports the development of Chesterford Research Park and provide additional jobs in easy commuting distance from NUGC and the delivery of B class uses in Garden communities. (Aviva Life & Pensions; PSLP2027) • It is vital that local plans contain policies that positively and proactively encourage the scale of development that is required to support the delivery of sustainable economic growth and in doing so contribute towards building a strong, competitive economy both locally and nationally. (Gladman; PLSP2808) • Supportive of the net increase of 14,000 new jobs in the local Plan Period and accommodate new employment opportunities in the district including Chesterford Research Park and NUGC. (Grosvenor, PSLP978) • We generally support policy EMP1 Employment Strategy and in particular point 10 which states, Council will support the provision of small scale office units to accommodate the needs of small sized businesses including incubator and grow on space. (PSLP2550)
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • Paragraph 5.25 Inconsistent with other references to the North side of the Airport Site. (MAG; PSLP 1520) • Para 5.25 Inconsistent with the employment land review 2017. The inclusion of this restriction which is not justified in any part of the plan and is unjustified and cannot be considered as effective or positively prepared. (MAG; PSLP 1520) • Policy unsound as it suggests the Pulse Packaging Site is allocated as an employment site is not justified (The Joint Administrators of Pulse Packaging; PLSP1672) • Point 5 does not acknowledge the value of existing non-B-uses established within these areas and the need to protect them and promote their employment generating capacity. Point 5 uses the term economic development uses to protect those uses for which a loss in floor space must be resisted. (Aldi's of Barking; PSLP2202) • Too dependent on growth at the airport and Chesterford Research Park, the latter of which has underperformed and is too car dependant with little connectivity to more sustainable transport (Wendens Ambo Parish Council; PSLP 2435,2437) • Given the sensitive location of some of the existing and proposed employment allocations, such as London Stansted Airport, Natural England advises that this policy include a

	<p>requirement for development to mitigate any direct or indirect adverse impacts to designated sites such as Epping Forest SAC, Hatfield Forest and other designated sites (Natural England; PSLP2460)</p> <ul style="list-style-type: none"> • As drafted, this confirms that any redevelopment that will result in the loss of floor space for economic development uses will be resisted. Paragraph 22 of NPPF1 reads as follows 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. (Carter Jonas; PSLP811) • Employment chapter seems to be predicated on the basis of the ELR medium scenario requirement for a net additional 10.2 ha of land for industrial use. The West Essex and East Hertfordshire Assessment of Employment Needs report identifies a much greater need for employment land (22-24 ha) in Uttlesford District, driven by demand for B8 accommodation. Growth Commission proposals for growth2 in the London Stansted Cambridge Corridor (LSCC), promote more substantial employment land provision in Uttlesford, taking advantage of improvements to the West Anglia Mainline (WAML) and the expansion of the Stansted Airport branch. (Pigeon Investment Management Ltd; PSLP 2739) • EMP1 and SP10 However, East Herts Council would like to request that Uttlesford District Council allocates land to the north of Bishop Stortford on land to the rear of Goodliffe Park on Stansted Road to facilitate the expansion of the employment area. The employment area at Goodliffe Park is currently constrained only by the presence of the district boundary and the presence of Green Belt. This was requested at the Regulation 18 consultation. (East Herts District Council; PSLP2499). • There is no clear economic strategy. Allocated employment sites have no bearing on where jobs are likely to be created, or which areas have good transport connections, or are attractive for employers. Additionally new employment land sites have been identified where employers do not want to be, and in locations where protected employment sites are already being converted to housing because of a lack demand by businesses and other employers. (R4U; PLSP2593) • 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. (Carter Jonas; PSLP811) • It would clearly be illogical to deliver most of the new homes within new settlements whilst most of the planned
--	---

	<p>commercial growth is delivered elsewhere in the district. A clear commitment to directing the planned employment growth (the 14,000 jobs target has been specifically identified to support the planned housing growth, see paragraph 3.76 of the PSULP)) to locations well connected to the planned housing growth needs to form the corner stone of Policy EMP1. Simply offering support for the provision of commercial uses is not sufficient to ensure that the required quantum and mix of commercial floor space that is required to deliver sustainable forms of growth will be delivered. (Carter Jonas; PSLP 811)</p> <ul style="list-style-type: none"> • It is unclear if the net floor space requirements are allocated to any site, as broadly required by the NPPF and the Planning Practice Guidance (PPG) to enable effective delivery and monitoring. (Essex County Council; PSLP912) • It is also not clear if the 55 ha at Stansted Airport is over and above any required need or when this is expected to come forward. • Principal Employment Areas within the Green Belt are further constrained from expansion and intensification by virtue of the fact that they have not been inset from the Green Belt. As such, the identification of these Principal Employment Areas serves little purpose in regard to encouraging growth and intensification of employment areas and is in fact more restrictive than if the site were not identified as an employment site, on the basis that it stipulates uses be restricted to B1, B2, B8 or complimentary suis generis uses. (WRC Morton Trust; PSLP941) • Part 7 of policy EMP1 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. (WRC Morton Trust; PSLP941)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • The text contained in brackets (other than those which constitute strategic warehousing) should be deleted. (MAG; PSLP 1520) • Point 1 of Policy EMP1 needs to define the quantum and mix of employment uses that are to be delivered within the three Garden Community sites. In order to be consistent with national policy. (Carter Jonas; PSLP811)
Policy EMP2 Existing and Proposed Employment Areas	
SUPPORT	1
OBJECT	7
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • The policy recognises that there is a significant amount of employment in complimentary sui-generis uses. Therefore, our proposals to locate the Councils lorry depot and a Classic car

	repairs and storage business would be fully in accordance with this policy. (PSLP2551).
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Concerns surrounding applicant requirement that employment use is no longer viable as per appendix 5 of the plan. (The Joint administrators of Pulse Packaging; PLSP1679) The inference that offices, warehouses, industrial and complementary sui generis uses are the only compatible uses which will generate employment is therefore incorrect and inconsistent with National Policy. (Adli's of Barkingside; PSLP2222) the policy does not acknowledge the important role of supporting uses in establishing successful business parks. 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 (Jackson Management; PSLP793) Object to the restrictive nature of this policy. (WRC Morton Trust; PSLP942) Unsupportive of intensification/expansion of the Principal Employment Areas for employment uses, contrary to the recommendations of the Employment Land Review Update 2017. 2. (WRC Morton Trust; PSLP942)
MODIFICATION REQUEST	<ul style="list-style-type: none"> The policy should be reworded to focus on the restriction of non-employment generating uses rather than focus on safeguarding only industrial and sui generis uses. (Adli's of Barkingside; PSLP2222) Existing and proposed employment areas identified as such on the policies map will be safeguarded for offices, warehouses, industrial, and complimentary sui generis uses <u>and auxiliary employment uses which support these uses (for example cafes, nurseries or gyms). Planning permission will be granted for the above uses within the Principal Employment Areas.</u> 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 either criterion a) is met or criteria b) and c) are met (Jackson Management; PLSP793)
Policy EMP3 Non-Estate Employment Uses	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
Policy EMP4 Rural Economy	

SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Policy too restrictive to sustainable development and contrary to the NPPF (Jackson Management; PSLP795)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Proposals which sustain and enhance the rural economy by creating and/or safeguarding businesses and jobs will be supported where they are of an appropriate scale to their location, protect the environmental quality and character of the rural area and protect the best and most versatile agricultural land (Grades 1, 2 and 3a). The following types of development are considered to be acceptable: <ol style="list-style-type: none"> 1. Schemes for farm diversification involving small-scale business and commercial development that contribute to the operation and viability of the farm holding <u>and are an appropriate scale to their location;</u> 2. Small-scale tourism proposals, including visitor accommodation <u>where they are an appropriate scale to their location;</u> 3. Proposals that recognise the economic benefits of the natural and historic environment as an asset to be valued, conserved and enhanced; 4. The expansion of businesses in their existing locations dependent upon the nature of the activities involved and provided the development does not conflict with other policies in the Local Plan; 5. Small-scale employment development <u>at an appropriate scale</u> to its location; to meet local needs; 6. The use of land for agriculture, forestry and equestrian activity; The re-use of rural buildings will be supported provided that; and 7. The redevelopment of a rural building does not lead to the conversion of annexes and buildings into separate dwellings. (Jackson Management; PSLP795)

Uttlesford District Council Regulation 19 Pre-submission Local Plan; Summary of Responses	
Section / Paragraph / Policy	Summary of Responses
6. RETAIL	
SUPPORT	0
OBJECT	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Para 6.17 – Eventually the garden villages will have enough properties to cater for regular retail needs within the settlement but at the outset daily retail needs need to be met to minimise traffic movements and develop the community. (Littlebury Parish Council PSLP 2415) • Para 6.16 – Objection to further goods provision in Saffron Walden as Tesco’s failure to implement planning permission for expansion of existing store supports the lack of need for further expansion; • Para 6.17 – Objection to suggestion that new garden communities should provide top-up shopping facilities only and each settlement should be required to have full provision of main food and comparison shopping facilities. Failure to provide these would be unsustainable and lead to further pressure on existing facilities (WeAreResidents.org PSLP 2245) • Two new self-contained Garden Communities in close proximity to Braintree and Great Dunmow will further destroy high street retailers. Question whether a full study has been undertaken to protect existing communities. (PSLP 29)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Para 6.16 should be redrafted, and the new settlement policies amended , to require that they have a proper retail offering, satisfying main food, top-up and comparison shopping needs for their residents; and • Para 6.17 should be amended to require both town centre provision in each of the new garden communities and local centre provision in those parts of the communities which are too far from the centres for easy walking (WeAreResidents.org PSLP 2245) • The settlement of 2 new self-contained Garden communities in close proximity to Braintree and Great Dunmow introducing low end retail employment and services will further destroy the high street retailers within the existing communities who are unlikely to receive the benefit from the self-contained communities and will potentially attract business away from them. Has a fully and honest study been undertaken to protect the existing communities? (PSLP 29)
Policy RET1 Town and Local Centres	
SUPPORT	2
OBJECT	9
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Support the identification of Thaxted as a 'Local Centre' as 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

	<p>term vitality and viability (Countryside UK Ltd. PSLP 2773)</p> <ul style="list-style-type: none"> • The Andrewsfield New Settlement Consortium (ANSC) supports policy RET1, requiring the provision of local centres at each of the three proposed Garden Communities. Further detailed master planning relating to the local centres for the WBG will need to be progressed through a master planning process for each garden community. (Andrewsfield New Settlement Consortium PSLP 2012)
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • The Retail Study 2018 indicates that there will be a need for an additional small to medium sized foodstore in Saffron Walden, but the Plan makes no allocation for such a space. This indicates either that the Plan does not support the findings of the Retail Study, or that it is deficient in its allocation of spaces. (Saffron Walden and Little Walden Neighbourhood Plan PSLP 2947) • The phrase “The presumption is therefore that new retail development is first provided in the existing town centres to preserve their vitality and viability” is not strong enough alone. (Saffron Walden and Little Walden Neighbourhood Plan PSLP 2947) • The growth of on line shopping, and its impact on established shopping centres is not addressed; and • Out of town retail should be minimised (Littlebury Parish Council 2416) • There is no site in the town centre of Saffron Walden so any such food store would necessarily be out of town in breach of the NPPF “town centre first” policy. We note the lack of proposed retail provision in any of the new settlements (a small top up shop in each only) and that the Plan is therefore proposing out of town retail development in SW which should be provided in the new settlement. This is therefore an unsustainable policy (Saffron Walden Town Council PSLP 2336). • Great Dunmow’s single supermarket is struggling to cope with meeting local needs and a new out of town supermarket is needed if more development is to go ahead. • Para 6.7 - It is stated at 6.7 that ‘the Local Plan seeks to address the loss of village services where possible’. Elsenham Parish Council is unable to discern any policy through which this laudable objective might be achieved. (Elsenham Parish Council PSLP 276) • We object to Policy RET1 and the retail hierarchy proposed. Each of the proposed new settlements would be significantly bigger than Great Dunmow, and Easton Park Garden Community would be bigger than Saffron Walden. Despite this they are all proposed to be below even Thaxted and Stansted Mountfitchet in the retail hierarchy. None of them can possibly therefore achieve the stated intention to show a high degree of self-containment. • In relation to Policy RET1, we note also that, by reason of this proposed hierarchy, the Retail Study May 2018 proposes no significant retail provision for any of the new settlements, and

	<p>instead proposes that almost all of the projected retail capacity increase in the district should be situated in either Saffron Walden or Great Dunmow. This is clearly unsustainable:</p> <ol style="list-style-type: none"> a. It increases rather than reduces the need to travel, contrary to the NPPF requirements; b. It is contrary to the stated intentions that the new settlements should be largely self-contained; c. It is contrary to the Council’s suggestion that the new settlements would show a considerably higher level of sustainable travel than currently exists in the district; d. It is contrary to the “town centre” first policy required by the NPPF in that it would increase the out of town retail provision in Great Dunmow and Saffron Walden to serve the new settlements, which additional provision would directly compete with the town centres. <ul style="list-style-type: none"> • The May 2018 Retail Study is therefore not fit for purpose as part of the Evidence Base, being based entirely on the pre-determined retail hierarchy, rather than being used to inform it; • We also object to the suggestion that a small to medium convenience store is required in Saffron Walden when there is no identified land for it, and the need would be driven purely by the new settlement development (outside of Saffron Walden, which is hardly ‘convenient’ for new householders); • Finally we object to the presumption set out in the final paragraph that new retail provision should be provided in the existing town centres, when it is obvious that the land does not exist for this, and when the draft Plan does not identify the land. Clearly, the potential retail sites which do exist should be preferred, but given their small size the Policy should properly provide for non-out of town provision for any additional facilities, almost certainly in the new settlements. (WeAreResidents.org PSLP 2246).
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Should be re-worded so that it is stronger. The applicant must be required to carry out an impact assessment on existing retail premises as well as on standard planning matters such as environment and traffic generation; • Retail premises outside the town centre must have rateable values set at the same rate as town centre premises to give all retailers a level playing field on which to compete. Retail premises outside the town centre must have their car parks included in the rateable value of the space to enable town centre retailers to compete on a level playing field (Saffron Walden and Little Walden Neighbourhood Plan PSLP 2947) • Include a Policy whereby the loss of village services might be rectified.(Elsenham Parish Council PSLP 276) • Policy RET1 should be redrafted so that; the new settlement sites should be on a par with Great Dunmow and Saffron Walden, and it should be clear that satisfying the needs of the new settlement sites by increasing provision in Saffron Walden and Great Dunmow is clearly unsustainable.

	(WeAreResidents.org PSLP 2246).
<u>Policy RET2 The Location and Impact of New Retail Development</u>	
SUPPORT	0
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • The Policies Map that accompanies the Pre-Submission Local Plan confirms that the Homebase site is not designated for any purpose or use (HHGL PSLP 1605). • The intent of Policy RET2 is supported. However, there is no such available space for any significant retail development in the centres of either Saffron Walden or Great Dunmow. Any development would therefore necessarily be out of town and contrary to NPPF policy requirements. This should be taken into account in assessing whether the retail proposals are sustainable or not; and • Any increase in retail provision is entirely unsupported by any transport modelling work. Given that ECC Highways has found that the Saffron Walden road network cannot accommodate significant further new housing, there is no reason to suppose that it can accommodate further retail traffic either. (WeAreResidents.org PSLP 2246).
MODIFICATION REQUEST	<ul style="list-style-type: none"> • The Homebase site is designated as a Retail Warehouse Area on the Policies Map and either subject to a new Policy or as an add-on to Policy RET2 that seeks to safeguard it for that purpose. (HHGL PSLP 1605).
<u>Policy RET3 Town and Local Centres and Shopping Frontages</u>	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • This policy on the basis that it is unclear and imprecise. Policy RET3 refers to the requirements of Appendix 5, yet Appendix 5 states that it applies only to policies EMP1, EMP2, RET1 and RET2. As a consequence, it is not clear what the relevant test of viability and requirement for marketing are so does not give a clear indication of how a decision maker should react to a development proposal. The final sentence is unnecessary as this relates to built form and is adequately covered by policy D1.(Sworders PSLP 847)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Delete final sentence; and • Other changes references under our comments to Appendix 5. (Sworders PSLP 847)
<u>Policy RET4 Loss of Shops and Other Facilities</u>	
SUPPORT	0
OBJECT	2
SUMMARY OF REPRESENTATIONS IN	

SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Generally supportive of the intention of the policy, and the marketing criteria set out in Appendix 5 are robust, although for conformity with the NPPF the policy and its supporting text should refer to cultural facilities either within the policy itself or within the supporting paragraphs. This would also support Objective 1d which seeks to protect and enhance existing local services which include cultural uses. The Trust previously highlighted the current weakness of policy in adequately protecting cultural uses in our previous submission. Unless such an amendment is made, the policy will not be in full conformity with the NPPF (both 2012 and 2018 versions)(Theatres Trust PSLP 1577). • Objection to this policy on the basis that it is unclear and imprecise. Policy RET4 refers to the requirements of Appendix 5, yet Appendix 5 states that it applies only to policies EMP1, EMP2, RET1 and RET2. As a consequence, it is not clear what the relevant test of viability and requirement for marketing are so does not give a clear indication of how a decision maker should react to a development proposal. • The title of the policy should be Loss of Village Shops and Community Facilities rather than “other” facilities as “other” is unclear in its meaning, rendering the policy imprecise. • Point 1 does not aid the decision maker; it is irrelevant. Point 3 will adequately demonstrate whether there is demand through marketing. (Sworders PSLP 848)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Addition of reference to cultural facilities within either the policy text to RET4 or supporting paragraphs 6.21-6.22. (Theatres Trust PSLP 1577). • Delete Point 1; and • Other changes references under our comments to Appendix 5 (Sworders PSLP 848)
Policy RET5 New Shops in Rural Areas	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	

<u>Uttlesford District Council Regulation 19 Pre-submission Local Plan; Summary of Responses</u>	
Section / Paragraph / Policy	Summary of Responses
7. Transport	
SUPPORT	5
OBJECT	39
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Para 7.11 - supportive of this approach and do not raise any objections (Chelmsford City Council PSLP1778)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Paragraph 7.3. HCC's LTP4 includes changes such as the new policy 1/request reflects LTP4s policy 1/its hierarchy (Herts County Council PSLP2655) • Paragraphs 7.8-7.9 Transport study for Saffron Walden not up to date (PSLP2250 WeAreResidents.org) • Paragraph 7.13 Include HCC in list of organisations District Council will work in facilitating the opportunity to make best use of public transport and access to facilities on areas of growth (Herts County Council PSLP2655) • Paragraph 7.13 support requirement for new development to link to existing facilities by cycle/pedestrian paths - but will not be delivered (PSLP2250 WeAreResidents.org) • Paragraph 7.15 - Flitch Way not just for walking and cycling/all users/add specific intention to improve access/safety above M11 J8 and link up severed sections(Flitch Way Action Group PSLP628) • Paragraph 7.16 - Include additional wording on modal shift as suggested in previous comments (Braintree Council PSLP2063) • Paragraph 7.16 Modal shift approach - while NUGC will generate significant movements located where need to travel can be minimised. Future proposals supported by overarching travel plan/plans for each landuse with measures, infrastructure and incentives. Care with terminology/ambitious modal shift target does not equate to a guaranteed ambitious mode share/express as modal share not modal shift/amend <i>"For Garden Communities a more ambitious non-car mode share shift away from single occupancy vehicle trip is required to reduce the impact on the highway network.</i> (Grosvenor PSLP953) • Paragraph 7.17 – Travel plans need targets/measures (PSLP2345 Saffron Walden Town Council) • Paragraph 7.18 while sound, unclear if applies to all developers/Add to 1 a Travel Plan Coordinator is only required for major development sites/a threshold. 2. Refer to possible co-ordination/ sharing of travel planning opportunities across the various A120 Garden Communities to maximise sustainable travel profile/reducing dependency upon car/single occupancy (Essex County Council PSLP916) • Paragraph 7.18 - While third sentence sound amend to: reducing dependency upon the private car and single occupancy of private car trip (Essex County Council PSLP917)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Paragraph 7.3. reflects LTP4s policy 1/its hierarchy (Herts County Council PSLP2655) • Paragraph 7.13 Include HCC in list of organisations District Council will work in facilitating the opportunity to make best use of public transport and access to facilities on areas of growth (Herts County Council

	<p>PSLP2655)</p> <ul style="list-style-type: none"> • Paragraph 7.15 -add specific intention to improve access/safety above M11 J8 and link up severed sections • Paragraph 7.16 - Include additional wording on modal shift as suggested in previous comments (Braintree Council PSLP2063) • Paragraph 7.16 Modal shift amend <i>“For Garden Communities a more ambitious non-car mode share shift away from single occupancy vehicle trip is required to reduce the impact on the highway network.</i> (Grosvenor PSLP953) • Paragraph 7.17 – Travel plans need targets/measures (PSLP2345 Saffron Walden Town Council) • Paragraph 7.18 Add to 1 a Travel Plan Coordinator is only required for major development sites/a threshold. 2. Refer to possible co-ordination/ sharing of travel planning opportunities across the various A120 Garden Communities to maximise sustainable travel profile/reducing dependency upon car/single occupancy (Essex County Council PSLP916) • Paragraph 7.18 - amend to: reducing dependency upon the private car and single occupancy of private car trip (Essex County Council PSLP917)
Policy TA1 Accessible Development	
SUPPORT	2
OBJECT	24
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Content with the assessment undertaken. The transport evidence suggests development in Uttlesford will not have severe impacts on the Suffolk highway network (Suffolk County Council PSLP2384)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Can no longer financially support unviable services so simply refer to provision of timetable information (Essex County Council PSLP914) • New developments to be connected by safe walking cycling routes to local facilities/require development to contribute to improving existing sustainable transport links/Saffron Walden’s poor/need huge improvement, Travel Plans must have measurable outcomes (PSLP2250 WeAreResidents.org) • Reduce transport emissions/allocate south of Beldams Lane, Bishop's Stortford (180 dwellings) due to bus and rail connections (PSLP191 Bloomhall) • Support overall approach i.e. co-ordinate development/transport – apply NPPF 32 Delete “accept rural nature of the district” 1.“congestion” replaces “impact” 6. Add with the potential to create significant impacts/delete “transport”(Grosvenor PSLP953) • At odds with Policy TA2 point 1 - offers appropriate routes for walking, cycling, horse riding and recreation (PSLP800 Essex Bridleways Association) • Lack of extra road and rail investment in infrastructure to cope with the increased demands placed upon it (PSLP1053 Ms Julie Williams) • Address reduction in transport emissions (PSLP141 Edward Gildea) • Tudor park has no footpaths/AQMA in Saffron Walden not resolved (PSLP2345 Saffron Walden Town Council) • No detailed transport assessment/no access north to M11 Junction 9/ travelling via busy A1301/A505/roundabout to J10 (PSLP1094 Mark Gamble) • Not clear how 60% modal shift can be achieved (PSLP1065 Simon Whitney)

	<ul style="list-style-type: none"> Locate new development where it can be linked to services/facilities by a range of sustainable transport options (PSLP2680 Persimmon) Travel plans a burden on older peoples housing (PSLP1985 McCarthy & Stone) Garden Towns must have good access to major roads/shift in transport modes essential for sustainability (PSLP1584 Mr Anthony Armon-Jones)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Can no longer financially support unviable services so simply refer to provision of timetable information (Essex County Council PSLP914) New developments to be connected by safe walking cycling routes to local facilities/require development to contribute to improving existing sustainable transport links/Travel Plans must have measurable outcomes (PSLP2250 WeAreResidents.org) Policy text delete “accept rural nature of the district” 1. “congestion” replaces “impact” 6. Add “with the potential to create significant” impacts/delete “transport”(Grosvenor PSLP953)
Policy TA2 Provision of Electric Vehicle Charging Points	
SUPPORT	1
OBJECT	10
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Encourages sustainable transport to promote accessibility and integration into the wide community and existing network. Supportive of this approach and do not raise any objections under soundness or legal compliance (Chelmsford City Council PSLP1778)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Increase to 5% active plus 5% passive provision for all developments would be reasonable. For Flats increase to 5% for both active and passive provision of Electric Vehicles Charging Points (Essex County Council PSLP919) Mention charging for on-street parking/public car parks PSLP662 Mrs Carey Dickinson) Apply to non-residential uses (PSLP2896 Grant & Bloor) Electric charging points not always be possible/practical (PSLP849 Sworders) Targets for flats/provision need to be more ambitious/ need multi-charging bays in public places (PSLP2025 Sustainable Uttlesford) Test via whole plan viability study (PSLP2809 Gladman) All new developments should provide for Electric Vehicles Charging Points (PSLP2418 Littlebury Parish Council)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Increase to 5% active plus 5% passive provision for all developments would be reasonable. For Flats increase to 5% for both active and passive provision of Electric Vehicles Charging Points (Essex County Council PSLP919) Mention charging for on-street parking/public car parks PSLP662 Mrs Carey Dickinson) Apply to non-residential uses (PSLP2896 Grant & Bloor) All new developments should provide for Electric Vehicles Charging Points (PSLP2418 Littlebury Parish Council)
Policy TA3 Vehicle Parking Standards	
SUPPORT	0
OBJECT	7
SUMMARY OF	None

REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Review Residential Parking Standards/increase provision (PSLP334 Elsenham Parish Council) Distribution/design of new development/potential for servicing sites through sustainable transport solutions to reduce emissions/specific targets to reduce CO2 emissions need to be set (PSLP652 Mrs Carey Dickinson)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Review Residential Parking Standards/increase provision (PSLP334 Elsenham Parish Council) Specific targets to reduce CO2 emissions need to be set (PSLP652 Mrs Carey Dickinson)
Policy TA4 New Transport Infrastructure or Measures	
SUPPORT	4
OBJECT	25
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Highways England have been heavily involved in the transport evidence base and support the enhancement to public transport and sustainable mode offer across the district and practically for the garden village developments. It will be essential for all development, and in particular for the garden villages, that housing comes forward along with all the key facilities as the demand arises (Highways England PSLP3025) The transport evidence suggests that development in Uttlesford will not have severe impacts on the Suffolk highway network. Content with the assessment undertaken (Suffolk County Council PSLP2385) Support point 3. Flitch Way Improvements - new walking/cycling connections south of Great Dunmow (Flitch Way Action Group PSLP628)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Measures should take account of impact on heritage assets, settings and archaeology (Historic England PSLP1862) Strongly welcomes measures on Braintree branch line/minor correction – i.e. not yet in control period 6 (Braintree District Council PSLP2063) Herts County Council must be involved early in the application process to inform S106s (Herts County Council PSLP2658) Supports in principle/queries the effectiveness of reference to rapid transit measures to Stansted Airport/not in airport application (East Herts Council PSLP2502) Any new path/off road route should be fully accessible to all user groups (PSLP404 British Horse Society) Already pressure on Birchanger village road network (PSLP1643 Birchanger Parish Council) Cycling measures in Saffron Walden need to be delivered/add to final paragraph “to avoid the centre and AQMA” (PSLP2255 WeAreResidents.org) Saffron Walden needs another east to west route (PSLP2973 Ian Norman) Extend NUGC measures to cam valley villages/Newport (PSLP2421 Littlebury Parish Council) Heavy rail links needed (PSLP1747 Stortford Town Council) Take more account of 10,000 dwellings at Easton Park (PSLP2602 Land Securities)

	<ul style="list-style-type: none"> • Stansted Airport railway station designed so an eastward extension could be made to the railway/dedicated busway unlikely to work • Potential changes from completion of Junction 7a/internalisation/modal shift at Garden Communities. Amend last sentence of Paragraph 9 “To cater for longer term growth in the region a further improvement to M11 Junction 8 may be required - a potential major long term major improvement is being developed by Essex/Hertfordshire County Councils/Highways England” (Land Securities PSLP2602) • Too aspirational/unclear how policy reached/enhancements required or envisaged/impact on airports transport facilities/no evidence to justify rapid transport corridor (Manchester Airport Group PSLP1521)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Measures should take account of impact on heritage assets, settings and archaeology (Historic England PSLP1862) • Strongly welcomes measures on Braintree branch line/minor correction – i.e. not yet in control period 6 (Braintree District Council PSLP2063) • Herts County Council must be involved early in the application process to inform S106s (Herts County Council PSLP2658) • Supports in principle/queries the effectiveness of reference to rapid transit measures to Stansted Airport/not in airport application (East Herts Council PSLP2502) • Any new path/off road route should be fully accessible to all user groups (PSLP404 British Horse Society) • Add to final paragraph “to avoid the centre and AQMA” (PSLP2255 WeAreResidents.org) • Amend last sentence of Paragraph 9 “To cater for longer term growth in the region a further improvement to M11 Junction 8 may be required - a potential major long term major improvement is being developed by Essex/Herts County Councils/Highways England” (Land Securities PSLP2602)

<i>Uttlesford District Council Regulation 19 Pre-submission Local Plan; Summary of Responses</i>	
Section / Paragraph / Policy	Summary of Responses
8. Infrastructure	
SUPPORT	0
OBJECT	22
SUMMARY OF REPRESENTATIONS IN SUPPORT	NA
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Paragraphs 8.1 - 8.5 discuss infrastructure funding, but fail to mention CIL • Align deliverability with the anticipated build/amend IDP to clarify if short or long term improvement works e.g. M11 J8 scheme should not apply long terms scheme to Easton Park (Land Securities PSLP2603) • Paragraph 8.15 - recreational horse riding must be included as a healthy active pastime (British Horse Society PSLP802) • Paragraph 8.16. Change to "indicates a rise in in levels of overweight or obesity" (Essex County Council PSLP923) • Paragraph 8.18. More up-to date data than 2006 from Public Health England and Royal Society of Public Health (Essex County Council PSLP924) • Paragraph 8.19. Additional text should be included to clarify why a Health Impact Assessment is required (Essex County Council PSLP926) • Paragraph 8.19 - Should be provided for ALL user groups (Essex Bridleways Association PSLP405) • Paragraph 8.21. Public Health be included as a body UDC liaises with (Essex County Council PSLP927) • Paragraph 8.23. Amend to reflect Health Impact Assessment guidance by Essex Planning Officers Association and Public Health/remove reference to Department of Health (Essex County Council PSLP928/929)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Paragraphs 8.1 - 8.5 mention CIL in infrastructure funding • Align deliverability with the anticipated build/amend IDP to clarify if short or long term improvement works /not apply long term schemes M11 J8 to Easton Park (Land Securities PSLP2603) • Paragraph 8.15 - recreational horse riding must be included as a healthy active pastime (British Horse Society PSLP802) • Paragraph 8.16. Change to "indicates a rise in levels of overweight or obesity" (Essex County Council PSLP923) • Paragraph 8.18. More up-to date data than 2006 from Public Health England and Royal Society of Public Health (Essex County Council PSLP924) • Paragraph 8.19. Additional text should be included to clarify why a Health Impact Assessment is required (Essex County Council PSLP926) • Paragraph 8.19 - Should be provided for ALL user groups (Essex Bridleways Association PSLP405) • Paragraph 8.21. Public Health be included as a body UDC liaises with (Essex County Council PSLP927) • Paragraph 8.23. Amend to reflect Health Impact Assessment guidance by Essex Planning Officers Association and Public Health/remove reference to Department of Health (Essex County Council PSLP928/929)
Policy INF1 Infrastructure Delivery	
SUPPORT	4
OBJECT	33
SUMMARY OF REPRESENTATIONS	<ul style="list-style-type: none"> • Maximum use made of existing infrastructure to allow strategic developments to proceed with minimum of delay/innovative approaches to

<p>IN SUPPORT</p>	<p>efficient use of services/behavioural change. Flexibility is provided on introducing a CIL for areas and/or development types where a viable charging schedule best mitigates impacts of growth. Garden Communities likely zero-rated for CIL purposes given heavy site-specific infrastructure requirements they bear (Grosvenor PSLP957)</p> <ul style="list-style-type: none"> • North Essex Plan Inspector notes interim solutions may be possible for transport infrastructure/proportion of traffic to enable early phases to proceed/could be applied to all infrastructure (Galliard Homes PSLP783) • Welcome the proposal to build four primary schools and one secondary school, as well as other civic amenities benefiting Great Chesterford/surrounding villages • Access to Saffron Walden County High School has become difficult for residents of Great Chesterford - new schools gives additional choice
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • The policy broadly accords with NPPF paragraphs 92, 96 and 97 2018/minor amendments required to policy/reasoned justification for clarity and consistency with Government policy (Sport England PSLP 66) • State development threshold on green infrastructure/new development cannot rely on Hatfield Forest to meet green infrastructure needs/new resources needed (Natural Trust PSLP2487) • Glossary needs definition of infrastructure (Essex County Council PSLP 921) • Infrastructure development must conserve and enhance the historic environment (Historic England PSLP1875) • Plans and policies should be revised to ensure that they are specific enough in their aims (West Essex Clinical Commissioning Group PSLP 2585) • Core Infrastructure must be delivered before development commences (Saffron Walden Town Council PSLP2351) • No Infrastructure Strategy for the area/lack of infrastructure identified to support the proposed growth/wish list/little justification or viability analysis, costing or timeframe (Residents for Uttlesford PSLP2589) • CIL instead of Section 106s would enable developer contributions to be used in truly strategic way/enable new developments to ease impact (Sustainable Uttlesford PSLP2038) • Requirement should be included in the policy and supporting text. • Places all risk with the community and little with the developer • Too many capacity constraints - sewerage, suds and electrical for sound WOBGC development • Public financial support doesn't mean master developer has to be a public-sector entity • Water Cycle Study suggests existing WRCs can only take initial residential growth in West Of Braintree/other growth would exceed headroom • Must include thresholds for planning obligations/contributions • Lack of infrastructure in Saffron Walden/schools/surgeries/traffic in centre/need a by-pass/little put in place by developers • Invest in current schools/former Friends private school • Not clear how applicant assesses if appropriate green infrastructure needed • Policies should be explicit on contributions to healthcare provision will be obtained/ developments sustainability on effective healthcare provision. • No firm plans for the provision of the required infrastructure • Better recognise role of public organisations in provision • Totality of costs borne by development must be adequately assessed

	<ul style="list-style-type: none"> • Omits thresholds/include obligations only if development exceed national thresholds, necessary to be acceptable, directly related in scale and kind (Sworders PSLP850) • Object to LtCan1, but concur with paragraph 8.1/INF1 (Andrew Martin PSLP2553) • Too generic, unclear what level of information/evidence needed to show how infrastructure could be used more efficiently/clarify will provide competitive returns to a willing land owner and willing developer (Boyer PSLP2565) • Pushes onus on developers to assess capacity/strategies to mitigate impacts. Should recognise the role of Council, Public Bodies and Statutory Undertakers in influencing, co-ordinating and delivering (Persimmon Homes PSLP2681)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Minor amendments required to policy/reasoned justification for clarity and consistency with Government policy (Sport England PLSP 66) • State development threshold on green infrastructure/new development cannot rely on Hatfield Forest to meet green infrastructure needs/new resources needed (Natural Trust PSLP2487) • Glossary needs definition of infrastructure (Essex County Council PSLP 921) • Infrastructure development must conserve and enhance the historic environment (Historic England PSLP1875) • Plans and policies should be revised to ensure that they are specific enough in their aims (West Essex Clinical Commissioning Group PSLP 2585) • Core Infrastructure must be delivered before development commences (Saffron Walden Town Council PSLP2351) • Public financial support doesn't mean master developer has to be a public-sector entity • Must include thresholds for planning obligations/contributions • Not clear how applicant assesses if appropriate green infrastructure needed • Policies should be explicit on contributions to healthcare provision will be obtained/ developments sustainability on effective healthcare provision. • Better recognise role of public organisations in provision • Totality of costs borne by development must be adequately assessed • Omits thresholds/include obligations only if development exceed national thresholds, necessary to be acceptable, directly related in scale and kind (Sworders PSLP850) • Clarify will provide competitive returns to a willing land owner/developer (Boyer PSLP2565)
<u>Policy INF2 Protection, Enhancement and Provision of Open Space, Sports Facilities and Playing Pitches.</u>	
SUPPORT	1
OBJECT	14
SUMMARY OF REPRESENTATIONS IN SUPPORT	NA
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • As the Sports Strategy should be completed/ at an advanced stage by examination it is considered acceptable for the local plan to be submitted in advance of the strategy being completed. The policy broadly accords with paragraphs 92, 96 and 97 of the NPPF (2018) and relevant 2012

	<p>policies/ minor amendments required to policy for consistency with Government policy (Sport England PSLP66)</p> <ul style="list-style-type: none"> • Policy based on an incomplete study/difficult to secure provision or financial contributions for indoor and outdoor sports facilities/include standards recommended in the Sports Strategy Need strategy on Green Infrastructure (National Trust PSLP2488) • No infrastructure/strategy identified to support the proposed growth in the district/IDP wish list/no justification, inadequate viability analysis, costing or timeframe for when the delivery is required/put all in plan (Residents for Uttlesford PSLP2589) • Need green corridors linking existing environmental assets/encouraging biodiversity in the district Sustainable Uttlesford PSLP2043 • Sharing facilities between schools and clubs often does not work in practice (Saffron Walden Town Council PSLP2358) • Stansted Mountfitchet has an unresolved shortage of open space (Stansted Mountfitchet Parish Council PSLP2623) • Sports Strategy should be available for evaluation now • Ensure new open spaces for sports facilities are provided to compliment and support the increase in housing to be built • Need separate policies for open space/playing pitch protection, and provision in new developments • Requirement for provision per person is not clear without an occupancy ratio for bedroom numbers/need extent of open space required • Contrary to the Open Space, Sport Facility/Playing Pitch needs set out in the IDP/increasing deficit in open spaces not addressed • Additional open space should be earmarked and pro-active funding should be sought for their development/allotments cannot be disposed of without Secretary of State permission • Objects to requirement for new developments providing on-site allotments • Newport and Stansted Mountfitchet faces a shortage of open space • Unnecessarily onerous requirement for on site provision for all schemes over 10 units that may not always be appropriate • Schools cannot cope with demand from their own students and local clubs • Weak on safeguarding existing recreational land and open space • Allotments/on-site play space, additional requirement may render schemes unviable/ limited evidence to justify the need for allotments (Boyer Planning PSLP2566) • Onerous requirement for on-site allotment e.g. 10 units in town centre/ flatted scheme/prevents the efficient use of land (Pegasus Planning Group PSLP2904)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • The policy broadly accords with paragraphs 92, 96 and 97 of the NPPF (2018) and relevant 2012 policies/ minor amendments required to policy for consistency with Government policy (Sport England PSLP66) • Include standards recommended in the Sports Strategy Need strategy on Green Infrastructure (National Trust PSLP2488) • Need green corridors linking existing environmental assets/encouraging biodiversity in the district Sustainable Uttlesford PSLP2043 • Ensure new open spaces for sports facilities are provided to compliment and support the increase in housing to be built • Add occupancy ratio for bedroom numbers/extent of open space required • Additional open space should be earmarked and pro-active funding should

	<p>be sought for their development</p> <ul style="list-style-type: none"> • Add - over 10 units threshold may not always be appropriate • Improve safeguarding existing recreational land and open space • Allotments/on-site play space, additional requirement may render schemes unviable/ limited evidence to justify the need for allotments (Boyer Planning PSLP2566)
Policy INF3 Health Impact Assessments	
SUPPORT	2
OBJECT	15
SUMMARY OF REPRESENTATIONS IN SUPPORT	NA
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Reference to EIA in bullet point 5 is unclear (West Essex Clinical Commissioning Group PSLP2585) • No assessment made of existing number of hot food takeaways in the District, the number already within 200 metres of a school/ likely to be restricted as a result of the policy/ businesses that would be rendered unviable by the restrictions (Kentucky Fried Chicken PSLP656) • Unnecessary requirement for all residential developments over 50 units to undertake a Health Impact Assessment/additional burden on housebuilders (House Builders Federation PSLP2529) • The PPG sets out that HIAs may be a useful tool where significant impact the but also importance of considering the wider health issues (Nathaniel Lichfield PSLP2886) • More specific guidance needed for robust HIAs to identify the responsibility and contribution of the Developer • HIA size threshold of 50 dwellings too high/ineffective on its own • HIA size threshold of 50 dwellings too low/unnecessary
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Clarify reference to EIA in bullet point 5 is (West Essex Clinical Commissioning Group PSLP2585) • Include assessment of existing number of hot food takeaways in the District, the number already within 200 metres of a school (Kentucky Fried Chicken PSLP656) • Avoid burden on housebuilders (House Builders Federation PSLP2529) • Consider the wider health issues (Nathaniel Lichfield PSLP2886) • More specific guidance for robust HIAs to identify the responsibility and contribution of the Developer
Policy INF4 High Quality Communications Infrastructure and Superfast Broadband	
SUPPORT	1
OBJECT	5
SUMMARY OF REPRESENTATIONS IN SUPPORT	NA
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Access from the nearest BT exchange is misleading as other independent fibre based networks are being deployed (Essex County Council PSLP930) • Not reasonable to request higher standards over and above the building regulations reflect Part R1/delete policy (House Builders Federation

	PSLP2530)
MODIFICATION REQUEST	<ul style="list-style-type: none">• Access from the nearest BT exchange is misleading as other independent fibre based networks are being deployed (Essex County Council PSLP930)

Uttlesford District Council Regulation 19 Pre-submission Local Plan; Summary of Responses	
Section / Paragraph / Policy	Summary of Responses
9. Design and Construction	
SUPPORT	1
OBJECT	5
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Paragraphs 9.5-9.7 supported as they reflect requirement to reflect local distinctiveness (Historic England PSLP 1878)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Paragraphs 9.10-9.16:- The 100 unit threshold requirement for a Masterplan is too high in the context of a small market town such as Saffron Walden where all development has an impact. The threshold should be 5 units or more to “safeguard Uttlesford’s distinctive character and environment”. (Saffron Walden and Little Walden Neighbourhood Plan PSLP 2960) • Uttlesford District Council is not good at securing beneficial S106 agreements and this has resulted in development with a few exceptions that has little to do with the vernacular architecture (Wendens Ambo Parish Council PSLP 2431) • Paragraphs 9.10-9.16:- The 100 unit threshold is too high in the context of Saffron Walden; and • Paragraph 9.14:- The plan does not state how phasing might be carried out in practice. (Saffron Walden Town Council PSLP 2362) • Policies D1, D2, D6, D8 should all need to recognise Neighbourhood Plans. (WeAreResidents.org PSLP 2260) • Paragraph 9.7 include reference in this paragraph to the fact that Policy D8 and D9 applies to new build developments and that there are certain exemptions for listed buildings, buildings in conservation areas and scheduled monument. (Historic England PSLP 1877)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Paragraphs 9.10-9.16:-A masterplan should be required for all developments of 5 units or more; and • Paragraph 9.14:- All phasing should be carried out so as to benefit the first residents. (Saffron Walden Town Council PSLP 2362) • The text for each of the policies (D1, D2, D6, D8) should be amended to read, “All aspects of these policies should apply unless specified in respective Neighbourhood Plans.” Plan (WeAreResidents.org PSLP 2260) • Include reference in this paragraph to the fact that Policy D8 and D9 applies to new build developments and that there are certain exemptions for listed buildings, buildings in conservation areas and scheduled monument (Historic England PSLP 1877)
Policy D1 High Quality Design	
SUPPORT	4
OBJECT	11
SUMMARY OF REPRESENTATIONS IN	<ul style="list-style-type: none"> • Galliard supports the Council's emphasis on the importance of high quality design. The development of garden communities

<p>SUPPORT</p>	<p>provides a unique opportunity to achieve well-designed places, where you don't have the constraints of existing development where an urban extension is planned. The Garden Community approach is also entirely consistent with section 8 of the NPPF in promoting healthy and safe communities. These two strategic objectives go hand-in-hand and are mutually complementary. (Galliard Homes PSLP 784)</p> <ul style="list-style-type: none"> • The reference in the policy to development resulting in healthy places which prioritise active travel and provide opportunities for, and access to, facilities for sport and physical activity is welcomed. This would be consistent with the Council's corporate plan and the Uttlesford Health and Wellbeing Strategy. (Sport England PSLP 68). • Policy welcomed and the change to include the term historic environment. (Historic England PSLP 1879) • The first paragraph refers to the development being informed by the Essex Design Guide and Building for Life 12. It would also be beneficial to include a desire to make reference to relevant conservation area appraisals, where appropriate, particularly in helping to better define the 'local distinctiveness' referenced by the Essex Design Guide. (Essex County Council PSLP 931)
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • Uttlesford District Council has a poor record on securing beneficial S106 agreements and developers have managed to either water down or justify removal of obligations (Wendens Ambo Parish Council PSLP 2432). • Policy D1 does not meet green infrastructure and climate change when it is essential that these are embedded within all stages of planning. (Essex County Council PSLP 933) • Reference should be made to relevant conservation appraisals where appropriate to help better define the "local distinctiveness" referenced by the Essex Design Guide (Essex County Council PSLP 931) • Policy DI is unclear, imprecise, wordy and repetitive making it difficult to interpret. This policy is overly wordy and repetitive, making it difficult to interpret. The first sentence states that it applies to "all new development", however, the detail contained in the rest of the policy precludes it from being applicable to all development. (Sworders PSLP 853). • Application of Essex Design Guide to planned new settlements will be inappropriate as the developments should reflect the age in which they are being planned and developed thus providing greater scope to incorporate energy generation and management discretely (Littlebury Parish Council PSLP 2423). • Policy is overly onerous as it requires new development proposals to enhance the amenity value of an area (Taylor Wimpey Strategic Land PSLP 2887) • No evidence in Draft Plan or evidence to support information on the size and type of dwelling being built in the area nor an assessment of the impacts of adopting the space standards. • In order to impose internal space standards local planning

	<p>authorities have to take into account:</p> <ul style="list-style-type: none"> – Need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes. – Viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted; – Timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions; and <ul style="list-style-type: none"> • Neither the draft Local Plan, nor any of the evidence papers supporting the Plan provides information on the size and type of dwellings being built in the area. (Persimmon Homes Essex PSLP 2684) • Policy D1 High Quality Design: the third paragraph mentions the need for development to ‘...provide for a rich movement network and choice of routes’. We would prefer to see this Policy clarified so that there is no confusion over the need to provide access for all users (British Horse Society PSLP 803 & Essex Bridleways Association PSLP 406) • There should be a provision whereby applications will not be considered from developers who have been found to be inadequate in the past; • It is stated that ‘All buildings, spaces and the public realm should be well designed and display a high level of architectural quality which responds positively to local context.’ Setting aside the question of what a well-designed space might look like, these are no doubt fine words; but how do you propose to achieve these laudable objectives? • Sections 9.15 and 9.16 state that design codes will be required. They should be available now. In practice, developers seek to build a collection of their standard designs. Specific guidelines are needed, e.g.: <ul style="list-style-type: none"> • 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 such that a double buggy could be
--	--

	<p>wheeled along comfortably.</p> <ul style="list-style-type: none"> • Several of these suggestions are drawn from examples of poor design to be found on new estates within a very short distance as I write this. • There is also a need to have regard for increasingly sustained high temperatures in summer by making adequate provision for air conditioning (PSLP 384). • Objection to the requirement to ‘enhance’ the amenity value of an area is overly restrictive, especially in light of the fact that new development will naturally result in some change in the environment.; and • The policy requires adherence to national space standards. Paragraph 001 Reference ID: 56-001- 20150327 of the NPPG makes it clear that LPAs will need to gather evidence to determine whether there is a need for additional standards in their area and justify setting appropriate policies in their Local Plans. Paragraph 002 Reference ID 56-002-20160519 of the NPPG confirms that LPAs should consider the impact of using these standards as part of their Local Plan viability assessment. There appears to be no evidence to justify the requirement for compliance with the national space standards and in these circumstances. (Bovis Homes Ltd. PSLP 2569) • We agree with the comments made by Saffron Walden Town Council in relation to the Reg 18 consultation, which are still applicable to the Reg 19 draft. Additionally policies D1, D2, D6, D8 should all need to recognise Neighbourhood Plans. (WeAreResidents.org PSLP 2262)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Change Policy D 1 to include following wording: <ul style="list-style-type: none"> – “Development will be expected through appropriate design and delivery to maintain, protect and enhance existing green infrastructure and contribute towards the provision of additional high quality multi-functional green infrastructure connecting to the wider network.” – “Development should consider future climate risks to ensure risks are understood over the development’s lifetime and implement appropriate adaptation and mitigation approaches in the design, delivery and maintenance.” (Essex County Council PSLP 933) • Change Policy D 1 so that it refers to relevant conservation area appraisals where appropriate to better define the “local distinctiveness referenced by Essex Design Guide. (Essex County Council PSLP 931) • The policy needs to be clearer which elements relate to all development and which only specific types of developments. <ul style="list-style-type: none"> – Suggest bullet points or numbered points for clarity. – Delete reference to “the necessary dwelling mix” (Sworders PSLP853) • Policy to be reworded to read: “Proposals for new development should demonstrate how they respond to and preserve the amenity value of an area through consideration of matters such as overlooking, natural light, microclimate,

	<p>outlook and amenity space. Equally, proposals for new development should meet the nationally described space standards (49) and the necessary dwelling mix, privacy, daylight and sunlight for future occupiers.” (Taylor Wimpey Strategic Land PSLP 2887)</p> <ul style="list-style-type: none"> • Reference to space standards in Policy D1 should be deleted as there is insufficient evidence to warrant their inclusion or assessment of the impact on delivery.(Persimmon Homes Essex PSLP 2684) • The last sentence in paragraph 3 the Policy should be reworded thus: ‘...provide for a rich movement network and choice of routes accessible to all users’(British Horse Society PSLP 803 & Essex Bridleways Association PSLP 406) • Do not accept applications from developers with a poor record. Make design codes available now, and ban some of the worst architectural horrors. Make adequate provision for air conditioning (Graham Mott PSLP 384). • Implementation of the policy can be supported by a minor modification should be made to the reasoned justification to refer to Sport England's and Public Health England’s ‘Active Design’ guidance (Sport England PSLP 68). • Object to this policy requirement to comply with the national space standards where there is no evidence to justify this requirement. (Bovis Homes Ltd. PSLP 2569) • The text of each policy should be amended to read “All aspects of these policies should apply unless specified in respective Neighbourhood Plans.”(WeAreResidents.org PSLP 2262)
Policy D2 Car Parking Design	
SUPPORT	0
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • This Policy is unduly prescriptive and does not have regard to local context. Developments within the District have included a range of parking typologies, including frontage parking; • The Policy requires the incorporation of street trees. Whilst street trees have a place, they are not always practical (in terms of the significant space required which can be upwards of 6m verge) or desirable from both an urban design perspective or because the highway authority will not adopt the road (Persimmon Homes Essex PSLP 2685). • The Policy D2 - Car Parking Design makes only a very generic statement, is uninformative and makes no reference whatsoever to any design standards to which it could or should be tied. The Essex Design Guide 2018 published by Essex County Council has a section allocated to parking design, which should be specifically linked to Policy D2.(PSLP 701) • A provision is needed whereby garages must be of sufficient size to accommodate all modern vehicles designed to seat up

	<p>to five persons. (Elsenham Parish Council PSLP 289)</p> <ul style="list-style-type: none"> We agree with the comments made by Saffron Walden Town Council in relation to the Reg 18 consultation, which are still applicable to the Reg 19 draft. Additionally policies D1, D2, D6, D8 should all need to recognise Neighbourhood Plans. (WeAreResidents.org PSLP 2263)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Parking should not dominate the public realm, with garages (where proposed) set back from the building line (Persimmon Homes Essex PSLP 2685). Policy D2 should clearly state that the Essex Design Guide 2018 - Car Parking Design guidelines should be followed for all new developments. Should there be any shortfall or omission within the design guide, then UDC should add its own supplementary standards (as was undertaken by the UDC parking standards) (PSLP 701) Amend the policy to ensure that garages must be of sufficient size to accommodate all modern vehicles designed to seat up to five persons. Where possible increase capacity by making the space slightly deeper and including road markings to show that parking at a chevron angle should be adopted. (Elsenham Parish Council PSLP 289) The text of each policy should be amended to read “All aspects of these policies should apply unless specified in respective Neighbourhood Plans.” (WeAreResidents.org PSLP 2263)
<u>Policy D3 Small Scale Development / Householder Extensions</u>	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Objection to this policy on the basis that it is unclear and imprecise. “Small scale development” is not defined anywhere in the Plan so it is not clear what this element of the policy applies to. Neither is it clear what “appropriate space standards” are and how these differ from the “nationally described space standards” referred to in policy D1. We consider it more appropriate that this policy should only apply to Householder Extensions. Other developments are covered by policy D1. (Sworders PSLP 854)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Rename the policy “Householder Extensions”; Delete references in the title and text to “small scale development”; and Clarify which space standards are applicable. (Sworders PSLP 854)
<u>Policy D4 Development Frameworks and Codes.</u>	
SUPPORT	2
OBJECT	13
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Council's decision to underpin its spatial development strategy with the creation of new garden communities is fully

	<p>supported. It is not clear from the wording of 'Development Frameworks and Codes' exactly who the Council anticipates will be responsible for the preparation of development frameworks. We are uncertain how the process described fits in with the work by the Councils that has commenced e.g. on a DPD for West of Braintree. (Galliard Homes PSLP 782)</p> <ul style="list-style-type: none"> • Andrewsfield New Settlement Consortium (ANSC) supports Policy D4 (Development Frameworks and Codes) as a sound approach to planning that will positively prepare for comprehensive development of the West of Braintree Garden Community (WBGC) across district boundaries, and including land at Boxted Wood controlled by Galliard Homes; and . • ANSC also recognises the benefits of a Design Code being approved for the WBGC ahead of any reserved matters or detailed application being determined, although it is submitted that this is not absolutely necessary dependent on a high quality detailed scheme being brought forward. (Andrewsfield New Settlement Consortium PSLP 1987) • We support the principle of Policy D4 which requires development frameworks to be prepared for the garden communities. The preparation of the development framework for NUGC as a DPD will provide UDC and the local community with sufficient clarity and certainty on NUGC's emerging development proposals (Grosvenor Great Britain and Ireland PSLP 963). • We broadly welcome this policy but suggest the addition of the words 'and responding to the historic environment' at the end of bullet point 3. (Historic England PSLP 1880)
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • The plan is weak in a number of policy areas; (b) the need for green infrastructure that mitigates or adapts to future climate change particularly the need for Sustainable Urban Drainage schemes associated with the proposed new Garden Settlements (Uttlesford Liberal Democrats Local Party PSLP 2981). • The requirements for Development Framework documents and Design Codes to be prepared, effectively add an additional 'layer' to the planning process. This results in additional time, cost, and expenditure of resources for both applicants and the Council. Delays may arise which could impact upon the timely delivery of new homes and in turn, the Council's housing trajectory. This could result in the Plan being rendered not effective; • Whilst the policy refers to 'strategic' development sites the term 'strategic' is not defined and it is conceivable that the requirements for Development Frameworks and Design Codes could be applied inappropriately to small-to-medium size allocations for which the process is unlikely to achieve any meaningful benefit. Similar outcomes could be achieved by a properly drafted Design and Access statement which will cover much of what is included in a Development Framework or Design Code in any event. It is therefore considered that the policy as drafted does not represent the most appropriate or

	<p>expedient way of securing good design for small-to-medium sites and is therefore not justified; and</p> <ul style="list-style-type: none"> • There are outstanding issues with neighbouring authorities regarding elements of the Plan that must be addressed in order for the Council to confirm that it complies with the duty to co-operate (<i>Martin Grant Homes & Bloor Homes PSLP 2909</i>) • Bullet 5 in the second paragraph should actually mention 'sustainable drainage systems' somewhere within it still, as when people think 'flood mitigation areas' they most likely are not thinking about SUDS. (<i>Environment Agency PSLP 609</i>) • Terminology is not consistent as Policy D4 and other policies refer to Development Frameworks which has been replaced by a DPD requirement as set out in SP5; • Policy D4 requires a single Design Code for each of the strategic sites to be approved prior to the submission of reserved matters but this is not appropriate in large developments which are likely to be developed over 20 plus years ; and • The requirement for applications relating to the new Garden Communities to undertake a Building for Life 12 Assessment (or a later equivalent). We would anticipate that most of the topics covered in the assessment would be the subject of condition or s.106 requirements on any outline planning permission relating to the new Garden Communities, as they relate to detailed design matters. (<i>Land Securities Policy 2606</i>) • There is a need for a GI policy that applies generally to development to be included within the document; and • A strategic approach to GI should be detailed in a specific policy or evident in related policies. In our view a strategic approach to GI has not been included anywhere in the Plan. This is a particular concern given the scale of development proposed and the key role of extensive areas of high quality GI in meeting people's demands for recreation.. (<i>Natural England PSLP 2466</i>) • The requirement for approval of a development framework prior to submission of a planning application for sites of 100 units is completely unjustified and will slow down delivery. It is also unclear as to who will approve the development framework, will it be officers or members and what recourse would there be if a framework was rejected. The policy seeks to introduce an additional requirement into the planning applications process for sites of more than 100 units which is unjustified and ineffective. (<i>Home Builders Federation PSLP 2534</i>) • Although the policy is supported in principle, there is a concern that this policy is overly onerous on the developer and landowner and has the ability to delay the sites being brought forward for development if these frameworks cannot be agreed with the Council or there are insufficient resources for these to be considered and adopted. This is, therefore, unsound as it ineffective (<i>Taylor Wimpey Strategic Land PSLP</i>)
--	--

	<p>2888)</p> <ul style="list-style-type: none"> • Policy D4 is not considered reasonable for all strategic development sites to produce a Development Framework for approval by the Council prior to submission. Strategic development sites are defined in the supporting text as ‘those in excess of 100 units’. Whilst a Development Framework may be appropriate for the new garden communities, they are not considered appropriate for sites less than 500 units; and • The requirement to establish density, mix and type of development, green infrastructure plans and phasing plans are also not considered appropriate for an outline planning application, the purpose of which is to establish if the principle of development is acceptable. The criteria set out in Policy D4 would normally be determined at the reserved matters stage. (Countryside Properties UK Limited PSLP 2769) • There is no justification as to why this number of dwellings (over 100) would require a development framework and/or design code. The provision of a development framework/design code for developments of this scale is considered unnecessary and an overly onerous requirement, given that such schemes would be delivered in one phase and would normally have one landowner. Development control policies would be sufficient to ensure that the proposal provides high quality design.(Bovis Homes 2570) • If it is the Council's intention that this policy relates to all potential development of a strategic scale then the definition of strategic scale should be included in the policy (Gladman PSLP 2810) • In the supporting text for this policy, paragraph 9.11, as well as within the policy itself, refers to the need for adopted masterplans for the sites to be submitted. It should be made clear for the West of Braintree Garden Community that this would be a Development Plan Document rather than a Supplementary Planning Document and it will be a joint document, covering the site in a comprehensive way (Braintree District Council PSLP 2065)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Bullet 5 in the second paragraph should actually mention 'sustainable drainage systems' somewhere within it still, as when people think 'flood mitigation areas' they most likely are not thinking about SUDS.(Environment Agency PSLP 609) • Policy D4 and other policies refer to Development Frameworks, which we understand are now replaced by the DPD requirement set out in Policy SP5. For the avoidance of doubt these references should be replaced, so that the terminology used throughout the plan is consistent; • Area Design Codes would be more relevant for a 10,000 unit New Garden Community at Easton Park which is likely to be built over 20 years plus; • The policy should be amended to require the approval of the relevant Design Code/Area Design Code, prior to approval of any reserved matters application; and • Clarify in Policy D4 whether the expectation is for outline or

	<p>reserved matters submissions to be accompanied by the Building for Life Assessment. (Land Securities Policy 2606)</p> <ul style="list-style-type: none"> • Uttlesford Local Plan should include a green infrastructure policy or preparation of Green Infrastructure Strategy for cross-reference within relevant policies. Policy EN8 Open Spaces could be easily amended to include reference to wider green infrastructure issues and requirements to protect and enhance the district’s GI network. (Natural England PSLP 2466) • The policy should be deleted. (Home Builders Federation PSLP 2534) • This policy to be effective and positively prepared, it should be amended to remove the requirement for the frameworks to be submitted to the Council for approval prior to the submission of any planning application. Instead the policy should allow for the submission of masterplan documents with any outline planning application for Strategic Development Sites. (Taylor Wimpey Strategic Land PSLP 2888) • This policy should be deleted from the Plan. (Countryside Properties UK Limited PSLP 2769) • It is suggested that planning applications can be prepared in parallel with the development framework. If everything is prepared in sequence this will add unnecessary delay to the delivery of development, which is not in the Council's interest, especially in the early years of the Plan. (Galliard Homes PSLP 782) • It is recommended that the requirement for a development framework/design codes on “strategic sites (over 100 dwellings)” is deleted but retained for the garden communities (where development would be phased, with multiple owners). (Bovis Homes 2570) • The requirement for Development Frameworks to be agreed by the Council prior to any application being made should be deleted. Requiring Council approval is considered to be too onerous as it may prevent non-allocated sustainable sites from coming forward simply because the Council will not agree to the content of the Framework (Gladman PSLP 2810) • The following amendments are required to the policy wording in order to ensure the deliverability of the garden community within the timeframes anticipated “Development Plan Documents (DPDs) frameworks shall be prepared for the garden communities and all strategic development sites for approval by the Council prior to submission of a Any planning application will need to accord with the development principles set out in the DPD and this policy. In the case of the new garden communities the development frameworks will be prepared as development plan or supplementary planning documents and adopted by the local planning authority. Where sites subject to a development framework crosses multiple land ownerships, the different landowners should work together to prepare a joint development framework that demonstrates how comprehensive development will be
--	---

	<p>delivered” (Grosvenor Great Britain and Ireland PSLP 963).</p> <ul style="list-style-type: none"> • It should be made clear for the West of Braintree Garden Community that this would be a Development Plan Document rather than a Supplementary Planning Document and it will be a joint document, covering the site in a comprehensive way (Braintree District Council PSLP 2065) • We broadly welcome this policy but suggest the addition of the words 'and responding to the historic environment' at the end of bullet point 3. (Historic England PSLP 1880) • The wording should be revised to exclude small-to-medium sized developments either by identifying individual sites (for example the Garden Communities and the larger urban extensions) or by setting a threshold for beyond which Development Frameworks or Design Codes will be required (for example, 1,000 units)..(Martin Grant Homes & Bloor Homes PSLP 2909)
Policy D5 Shopfronts	
SUPPORT	1
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	We very much welcome the inclusion of a policy supporting the retention and enhancement of historic shopfronts. (Historic England PSLP 1882)
SUMMARY OF REPRESENTATIONS IN OBJECTION	Policy D5 should include review by the relevant town/parish council where they have a Neighbourhood Plan. (WeAreResidents.org PSLP 2266)
MODIFICATION REQUEST	D5 should include review by the relevant town/parish council where they have a Neighbourhood Plan (WeAreResidents.org PSLP 2260)
Policy D6 Design Review	
SUPPORT	0
OBJECT	5
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Objection to the blanket requirement for all large schemes to be subject to a design review, which is considered not effective. This should be a matter for the applicant to agree to and should not be an obligation imposed on all such schemes; and • This policy does not define what a “strategic” or “major” development site is, meaning the policy could affect small-to-medium scale sites for which a design review process will present a significant burden in terms of time and resourcing. The requirement to undertake design review will also require significant resourcing from the Local Planning Authority at a time when budgets and staffing are already stretched. (Martin Grant Homes & Bloor Homes PSLP 2908) • Policy D6 sets out the proposed requirement for design review for emerging schemes. This policy should be clarified to confirm that by “emerging schemes” it refers to emerging reserved matters submissions; and • Additionally, Policy D6 should make clear that the Design

	<p>Review will need to have regard to the Design Code/Area Design Code approved in accordance with Policy D4.(Land Securities PSLP 2607)</p> <ul style="list-style-type: none"> • This policy seems to apply only to Garden Communities and other sites at the discretion of the Council (Saffron Walden Town Council PSLP 2364). • It is considered that all projects should be subject to design review, without the need to make a subjective judgment as to whether smaller sites are 'in important and/or sensitive locations' (Elsenham Parish Council PSLP 277) • Object to Policy D6 which requires all new Garden Communities, other strategic development sites and smaller sites in important or sensitive locations to be assessed through design review. This is considered to be too onerous and restrictive (Gladman PSLP 2811)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • It is considered that this is unnecessary and should be removed from the Plan; • To overcome this objection, it is requested that the policy be amended to encouraging design review rather than requiring it. (Martin Grant Homes & Bloor Homes PSLP 2908) • The text of each policy should be amended to read "All aspects of these policies should apply unless specified in respective Neighbourhood Plans."(WeAreResidents.org PSLP 2262) • This policy should be clarified to confirm that by "emerging schemes" it refers to emerging reserved matters submissions; and • Policy D6 should make clear that the Design Review will need to have regard to the Design Code/Area Design Code approved in accordance with Policy D4..(Land Securities PSLP 2607) • In order to deliver objective 3a (page 14) to "safeguard Uttlesford's distinctive character and environment", this policy should apply to all developments; and • The design review should consider the Heritage and Character Assessments of neighbourhoods, where such assessments exist. (Saffron Walden Town Council PSLP 2364). • Amend the second sentence to read, 'Equally, smaller sites will also be subject to design review' (Elsenham Parish Council PSLP 277) • The Policy should be reworded to state that the Council will encourage rather than require emerging schemes to be assessed through a design review.(Gladman PSLP 2811)
Policy D7 Innovation and Variety	
SUPPORT	0
OBJECT	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Concern remains that the outcome will be poor. Uttlesford District Council does not have a good record of obtaining beneficial S106 agreements and there have been very few benefits coming from developers who have been able to water

	<p>down or ‘justify’ the removal of requirements; and</p> <ul style="list-style-type: none"> • With some notable exceptions, the type of construction which has been built in towns such as Saffron Walden, has little to do with the vernacular architecture and remains firmly wedded to generic ‘boxes’. It is therefore difficult to see how Policy D7 (Innovation and Variety) will actually be implemented. (Wendens Ambo Parish Council PSLP 2433) • There should be a specific ban on ‘off-the-shelf’ housing types. In Elsenham there have often been fine words about respecting the local vernacular, and the like; in practice, developers have then offered a mix of their standard designs (Elsenham Parish Council PSLP 278). • This policy is considered unnecessary and should be incorporated into Policy D1 relating to High Quality Design. (Bovis Homes Ltd. PSLP 2571)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Include a specific ban on ‘off-the-shelf’ housing types. (Elsenham Parish Council PSLP 278). • The term “off the shelf” is considered inappropriate and this policy should be removed. (Bovis Homes Ltd. PSLP 2571)
<u>Policy D8 Sustainable Design and Construction</u>	
SUPPORT	0
OBJECT	9
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • This policy deals with sustainable design and construction but fails to mention solar panels (Saffron Walden and Little Walden Neighbourhood Plan PSLP 2961). • Surface water drainage needs to be designed and delivered in accordance with the guidance produced by ECC in its role as Lead Local Flood Authority. This should be stated in Policy D 8 (Essex County Council PSLP 935) • This policy on the basis that it is unclear, imprecise and unnecessary. Sustainable design and construction are adequately dealt with through point 1 of policy SP12 and other regulations; and • The policy also conflicts with policy D9; policy D8 requires development to be in accordance with relevant Building Regulations whereas policy D9 requires emissions to be 19% lower than those required by Building Regulations. As a consequence, it is not clear what the relevant standards are so does not give a clear indication of how a decision maker should react to a development proposal. (Sworders PSLP 855) • The second paragraph requires development to demonstrate as part of any application how it is consistent with appropriate Building Regulations. Such an approach is not appropriate and could lead to significant confusion as to the grounds on which an application should be refused. It must be assumed when considering an application that it will be built to the required regulation and it will be for that system to determine whether or not these have been met (Home Builders Federation PSLP

	<p>2535 & PSLP 2265)</p> <ul style="list-style-type: none"> • This policy deals with sustainable design and construction but fails to mention solar panels. (Saffron Walden Town Council PSLP 2365 & PSLP) • There should be no requirement for applicants to demonstrate how they will meet Building Regulations or provide an Energy Assessment detailing the energy demands and carbon dioxide emissions as required by Part L of the Building Regulations. These regulations are legal standards to which all developers must accord and as such it is inappropriate and unnecessary to require any evidence on these matters when applying for planning permission. Such an approach is not appropriate and could lead to significant confusion as to the grounds on which an application should be refused. (Persimmon Homes Essex PSLP 2686) • This plan falls short of the government’s national standards for a building’s sustainability and for zero carbon buildings; • There is no reference in this plan to Zero Carbon, nor any sense that the plan espouses such a target. Without clearly stated, targeted commitments, there is no way of stopping development; and • No evidence that the council has consulted with partners, research or exponents of good practice in sustainable, zero carbon building and development. (PSLP 666) • No reference in this plan to Zero Carbon, nor any sense that the plan espouses such a target or shows the level commitment or leadership in reaching it. Instead it seems to be riddled with 'get out clauses' that will enable developers to pay scant regard to the government's policy. (PSLP 146)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • The text of each policy should be amended to read “All aspects of these policies should apply unless specified in respective Neighbourhood Plans.” (WeAreResidents.org PSLP 2262) • Change Policy D 8 to include an additional sentence to read: “Waste, recycling and storage areas should be provided. Equally, systems that reduce water consumption and allow for the reuse of grey water is encouraged. Development will not increase flood risk on or off the site. Developer to design and deliver the surface water drainage in accordance with Lead Local Flood Authority guidance.” (Essex County Council PSLP 935) • Delete this policy (Sworders PSLP 855). • The second paragraph of D8 should be deleted. (Home Builders Federation PSLP 2535) • The second paragraph of D8 should be deleted. .(Persimmon Homes Essex PSLP 2686) • Close adherence to national minimum standards (PSLP 666)
<u>Policy D9 Minimising Carbon Dioxide Emissions</u>	
SUPPORT	0
OBJECT	7
SUMMARY OF	

<p>REPRESENTATIONS IN SUPPORT</p>	
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • The plan unsound because (1) it is weak in a number of policy areas: We consider the encouragement of use of renewable and other technologies which help reduce our carbon footprint, especially in the construction of new Garden Villages. (Uttlesford Liberal Democrats Local Party PSLP 2982) • Concerned that policy D9 sets requirements beyond the scope of national technical standards for energy efficiency. In 2015 the Government made it clear that these matters should be addressed only through Building Regulations rather than through planning policy . Policy D9 as drafted directly conflicts with this requirement, meaning the policy will effectively encroach upon what should be dealt with under a different consenting regime. Policy D9 is not consistent with national policy and guidance (Martin Grant Homes & Bloor Homes PSLP 2907) • The last line states "These requirements will apply unless it can be demonstrated that they would make the development unviable". This statement is an invitation to developers to do as little as they can get away with. (PSLP 2542) • Government’s intention is to deliver the vast majority of improvements in technical building standards through Building Regulations. As such there should be no requirement for applicants to provide an Energy Assessment detailing the energy demands and carbon dioxide emissions as required by Part L of the Building Regulations. These regulations are legal standards to which all developers must accord and as such it is inappropriate and unnecessary to require any evidence on these matters when applying for planning permission. • The Government have set out the optional technical standards that can be adopted in local plans. These do not include measures to improve energy efficiency above Building Regulations. (Persimmon Homes Essex PSLP 2687) • Encouraging developers to include renewable energy as part of a scheme and minimising resource use in general should not be taken forward into the Local Plan as a mandatory energy efficiency requirement. This would be contrary to the Government’s intentions, as set out in ministerial statement of March 2015, the Treasury’s 2015 report ‘Fixing the Foundations’6 and the Housing Standards Review, which specifically identified energy requirements for new housing development to be a matter solely for Building Regulations with no optional standards; and • The Government have set out the optional technical standards that can be adopted in local plans. These do not include measures to improve energy efficiency above Building Regulations. (Home Builders Federation PSLP 2536) • This policy sets out that development proposals should achieve a Dwelling Emission Rate that is 19% lower than the Target Emission Rate required by Building Regulations Part L 2013 Edition. In accordance with Government guidance,

	<p>energy regulations should be dealt with by Building Regulations with no optional standards. Therefore this policy is contrary to National Planning Policy and is unsound. (Bovis Homes Ltd PSLP 2572)</p> <ul style="list-style-type: none"> • Are the required Insulation measures sufficiently robust? Many developers attempt to downgrade this provision. UDC was happy to showcase a Passive Haus. Why cannot this be the presumption in all new development in the District? Heat recovery should be standard, where possible. (Birchanger Parish Council PSLP 2520)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Policy D9 should be deleted. (Martin Grant Homes & Bloor Homes PSLP 2907) • The last sentence in the Policy should be removed from the document. (PSLP 2542) • We recommend that this policy makes reference to the fact that energy regulations are dealt with by Building Regulations (Bovis Homes Ltd PSLP 2572) • Policy D9 should be deleted. (Persimmon Homes Essex PSLP 2687) • Policy D9 should be deleted. (Home Builders Federation PSLP 2536)
<u>Policy D10 Highly Energy Efficient Buildings</u>	
SUPPORT	1
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • We support the goal of building highly energy efficient low carbon homes in the Garden Settlements. (Uttlesford Liberal Democrats Local Party PSLP 2983)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Meeting climate change targets through new-build housing is made difficult because the developers are only bound by Building Regulations which have not been updated since 2013. The creation of zero-carbon or low-carbon housing in the Garden Settlements should be the aim of developers by including such measures as passiv-haus or pv panels. The use of renewable and other technologies to reduce carbon footprints should be a key goal of the Local Plan. (Uttlesford Liberal Democrats Local Party PSLP 2024) • Such new housing as is essential should not add to current problems of air pollution, flooding, congestion and social inequality. It should comply with passive house standards of sustainability. It should be financed by serious tax reforms and accompanied by sufficient steps to put right the mistakes of the past. These include neglect of waterways, building on flood plains, concreting over hill slopes, reduction of public transport, inadequate provision for climate change, dependency on imports and failure to provide infrastructure. (PSLP 1927)
MODIFICATION REQUEST	

Uttlesford District Council Regulation 19 Pre-submission Local Plan; Summary of Responses	
Section / Paragraph / Policy	Summary of Responses
10. Environment	
SUPPORT	0
OBJECT	6
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • There are three Sites of Special Scientific Interest around the proposed area where Easton Park Housing Estate would be built and there has already been a complete disregard in recent years as to the worth of these areas despite being the three largest, in terms of land area, in the District of Uttlesford. If the development of Easton Park is approved, the High Wood Site of Special Scientific Interest will be almost entirely surrounded by housing preventing migration, re-population of the local area and mixing of the gene pool of individual animal and plant species. (PSLP760) • Pressure from potential expansion of villages within adjacent character areas which would infringe on the open character of the area; The visual intrusion of potential road expansion linked to the pressure of traffic on minor roads; The erection of new buildings, which would be conspicuous on the skyline; Potential pressure for increased use of narrow and minor roads; Potential pressure from urban expansions on the edges of Great Chesterford and Saffron Walden.(PSLP1792) • Heritage sites; Assessment referred to in the Local Plan, states that alternative sites should be considered in order not to compromise the heritage assets within this highly sensitive site (Roman Temple @ Great Chesterford) It is without question that this landscape would suffer irreversible harm in terms of Heritage Assets should this development be approved. (PSLP1792) • PARAGRAPH 10.57 Saffron Walden has an AQMA that contains some road junctions where there is a risk that levels of nitrogen dioxide do not meet the national air quality objective. The AQMA is in place because levels of nitrogen dioxide do not meet the national air quality objectives. (Saffron Walden Town Council; PSLP2370) & (Saffron Walden and Little Walden Neighbourhood Plan; PSLP2966) • The lack of any environmental programme. The Evidence Base documents include various landscape and visual impact studies and ecological assessments of the new site proposals but no work at all has been done by the Council in terms of overall environmental planning as part of the Local Plan process. (Newport Parish Council; PSLP3003)

MODIFICATION REQUEST	<ul style="list-style-type: none"> The phrase “where there is a risk that” should not be used. The AQMA is in place because levels of nitrogen dioxide do not meet the national air quality objectives. (Saffron Walden Town Council; PSLP2370) & (Saffron Walden and Little Walden Neighbourhood Plan; PSLP2966)
Policy EN1 Protecting The Historic Environment	
SUPPORT	0
OBJECT	8
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Adding thousands of new residents to the area will speed up the environment degradation regardless of how many admirable conservation schemes you put in place. The only safe environment is one that is not impacted heavily by human activity. Parts of rural Essex fit that description, but not for long if this plan goes ahead. (PSLP48) The first sentence “preserves or enhances” is not in accordance with paragraph 131 of the NPPF which requires “sustaining and enhancing”. (Sworders; PSLP856) Proposals will be considered against the wider social, cultural, economic and environmental benefits that the historic environment can bring. It is not clear what this means or how it reflects the NPPF. (Sworders; PSLP856) Building on the hilltop and hillsides, as is proposed at NUGC, is contrary to the traditional pattern of Uttlesford settlements being housed in the valley bottoms, and would make the NUGC visible for miles around. The light pollution created would be considerable and detrimental. (PSLP1059) We object to the new Policy EN1 and the change made to the Reg 18 draft, which provided that development would be supported where it “protects and enhances” the historic environment; the Reg 19 draft provides only that development preserves or enhances. (WeAreResidents.org; PSLP2268) We note with concern the failure to assess the impact on the environment in proposing site allocations “as far as are aware for example, although developers look at the traffic impact of their development on the road network, there has never been any assessment of the impact of the effect of additional traffic attributable to any developments on the historic centre of Saffron Walden, the Conservation areas or any historic assets. (WeAreResidents.org; PSLP2268)
MODIFICATION REQUEST	<ul style="list-style-type: none"> We suggest the use of the word 'conserves' instead of 'preserves' in para 1. (Historic England; PSLP1885) Proximity to Hatfield Forest should be listed as a constraint for allocated residential sites within the Hatfield Forest Zone of Influence, as with Policy TAK1. Reference could be made to Policy ENV1 and the requirement to carry out a SSSI Impact Assessment (The National Trust; PSLP2494) Policy EN1 refers to support being given for development

	which "preserves or enhances the significance of the historic environment". However, the revised Framework refers at paragraph 185 to the need to "set out a positive strategy for the conservation and enjoyment of the historic environment". (Endurance Estates; PSLP2824)
Policy EN2 Design of Development within Conservation Area	
SUPPORT	0
OBJECT	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Policy unduly restrictive with "conserves and enhances" not clear why the first sentence departs from the NPPF (Paragraph 131) (Sworders; PSLP857) • Does not align with the NPPF p 132-134 with wording "development will be permitted where there is no detrimental visual impact." (Gladman; PSLP2812)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Replace "Conserves and Enhances" with "sustain and enhances" (Sworders; PSLP857) • Amend character and appearance to character or appearance in line with the provision of the Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (Historic England; PSLP1886)
Policy EN3 Protecting the Significance of Conservation Areas.	
SUPPORT	0
OBJECT	5
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Not Consistent with NPPF paragraph 134 which provides a balancing exercise which states; "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal". Paragraph 133 states that "where substantial harm or total loss of significance of a designated heritage asset is proposed, consent should be refused unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh the harm or loss." (Grosvenor; PSLP965) • We note with concern the failure to assess the impact on the environment in proposing site allocations (WeAreResidents.org; PSLP2269) • This Policy should also state that development outside the Conservation Area must not have a detrimental impact on traffic within the Conservation Area. (Saffron Walden Town Council; PSLP2366) • Object as EN3 in its drafted states that development will only be permitted where it is not detrimental to character. This is not in line with the advice set out in the Framework (Gladman; PSLP2813)

MODIFICATION REQUEST	<ul style="list-style-type: none"> Amend the policy wording to ensure consistency with the NPPF: “Development outside of the conservation area which might otherwise affect its setting will only be permitted where it is not detrimental harmful to the character, appearance or significance of the Conservation Area and does not adversely affect listed buildings or non-designated heritage assets, either within or outside the Conservation Area, unless such harmful impacts are outweighed by public benefits arising from the development.” (Grosvenor; PSLP965)
<u>Policy EN4 Development Affecting Listed Buildings</u>	
SUPPORT	0
OBJECT	7
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none">
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> This policy fails to cover buildings for which there is a listing application pending. (Saffron Walden Town Council; PSLP2367) Unduly restrictive and not consistent with National Policy; (Sworders; PSLP858) It is not in conformity with the guidance set out in the Framework.
MODIFICATION REQUEST	<ul style="list-style-type: none"> Should be much more specific concerning sports provision and playing fields; proper air quality assessments; a review of the housing need (the models employed are suspect and open to criticism); lower upper limit on housing densities; proper traffic assessment (PSLP687) “Suggested wording in relation to demolition: “Demolition of a Listed Building or development proposals that result in substantial harm or total loss of significance of a heritage asset will not be permitted unless it can be demonstrated that the loss is necessary to achieve substantial public benefits that outweigh that harm”. (Sworders; PSLP858) Development should preserve the listed building and its setting. (Historic England; PSLP1887)
<u>Policy EN5 Historic Parks and Gardens</u>	
SUPPORT	0
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
<u>Policy EN6 Scheduled Monuments and Sites of Archaeological Importance</u>	
OBJECT	1
SUPPORT	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Historic England welcomes the inclusion of a policy for non-designated heritage assets of local importance in the Plan. (Historic England; PSLP1892)
SUMMARY OF	<ul style="list-style-type: none"> We strongly support the statement in in para 10.31 of the

REPRESENTATIONS IN OBJECTION	supporting text that ancient woodland is an irreplaceable habitat and hence that permission for any development which damages it should be refused. This is entirely consistent with the direction of travel of national planning policy where it states in the new NPPF at para 175c that: development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons ⁵⁸ and a suitable compensation strategy exists; However the plan cannot be considered sound, as this strong stance is contradicted by the wording of policies EN7 and EN9 where the protection of ancient woodland is heavily qualified by references to social and economic benefit of development
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Incorporate the wording of para 10.31 into the wording of policies EN7 and EN9 or follow the wording on ancient woodland and veteran tree protection in the new NPPF (The Woodland Trust; PSLP 1892)
Policy EN7 Protecting and Enhancing the Natural Environment	
OBJECT	2
SUPPORT	16
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • We note that our comments have been included (Environment Agency; PSLP610) • Paragraph 10.24. Local Nature Reserves have been listed as non-statutory in this paragraph. However, they are protected under the National Parks and Access to the Countryside Act 1949. Local Nature Reserves must be described as statutory. (Essex County Council; PSLP940) • Paragraph 10.32. UDC (Development Management) has three Biodiversity checklists (for householder, minor and major developments) but reference to the checklists is not been included within this or other sections of the Local Plan. Checklists are a mechanism for delivering policy and should be required. (Essex County Council; PSLP944) • The wording of Policy EN7 is insufficiently clear and robust and does not fully reflect NPPF guidelines on Habitats and Biodiversity (Essex Wildlife Trust; PSLP960) • The last paragraph of the policy text introduces the requirement for compliance with aerodrome safeguarding considerations. This is welcomed and supported. However, the wording requires some alteration to remove ambiguity. Specifically, the policy only seeks that aerodrome safeguarding matters should be considered for “Measures to enhance biodiversity “This is too narrow, albeit perhaps unintentionally. All schemes that address biodiversity, whether they create, enhance or maintain, need to consider aerodrome safeguarding matters. (MAG; PSLP1522)

	<ul style="list-style-type: none"> • Environmental protection issues will not be sustained unless there is a robust system of co-ordination of utility works to ensure that essential works are carried out at the same time and not sequentially. A system of robust sanctions to ensure compliance is also needed. This also applies to the impact of construction traffic on the natural environment. (Sustainable Uttlesford; PSLP2031) • Paragraphs 10.25, 10.26,10.64 and Policy EN7 It contains many proposals (described above) that have already been shown, over the years, to conflict with the principles of sustainable development, conservation and mitigation, protection of character, and transport planning. Inadequate provision of mitigation for protected species. (PSLP2330) • Natural England set out their mitigation regarding the impact of the policy on Hatfield Forest. They highlight that the due to distances, Epping Forest can be screened out of the Uttlesford Local Plan. (Natural England; PSLP2448) • Whilst it indicates that an ecological survey will be required, it does not clearly set out that an impact assessment will be required, as indicated in para. 10.32. Hatfield Forest SSSI and NNR is an asset to the Uttlesford District but is currently in “Unfavourable Recovering” condition as explained above. The National Trust would like to see a policy which requires developers to submit a SSSI Impact Assessment if their site falls within an established Zone of Influence (as defined in the National Trust’s evidence report). Any development which alone, or cumulatively would have an adverse impact upon Hatfield Forest should provide or contribute towards appropriate on-site or off-site mitigation. Such mitigation could include visitor and botanical monitoring, visitor and community education and infrastructure maintenance. Ideally any contributions should be linked to a tariff style charging schedule based upon the number of bedrooms per dwelling. This policy is not consistent with national policy and would not be effective in ensuring that new developments would not have an adverse impact upon nationally important SSSI sites. (The National Trust; PSLP2489) • This part of the Plan sets out polices for each of the sites allocated in the plan for residential development. The constraints for each site are listed under the policy. However proximity to Hatfield Forest is only listed as a constraint under Policy TAK 1 (Land between 1 Coppice Close and Hillcroft, South of B1256, Takeley Street). The National Trust considers that this constraint should be listed for all those sites falling within the 10.4km winter Zone of Influence. (These are ref: DEB1, ELS1, GtDUN 1, GtDUN 2, GtDUN3, Gt DUN 4, GtDUN 5, GtDUN 11, GtDUN11, GtEAS 1, QUE 1, STA 1, TAK 1, TAK 3, THA 1) (The National Trust; PSLP2492) •
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Paragraph 10.23. Correction and advisory Please note that Essex Biodiversity Project is still hosted by Essex Wildlife Trust but it no longer exists as a partnership. The sentence needs to

	<p>be edited to provide an updated position. Change paragraph 10.23 to read: The strategy is to protect and enhance biodiversity within the District working with partners including the Essex Wildlife Trust and through controls on development to reduce potential impacts on sites which may have importance for biodiversity. (Essex County Council; PSLP936)</p> <ul style="list-style-type: none"> • Paragraphs 10.24 and 10.26. County Wildlife Sites are mentioned in paragraph 10.24 and Local Wildlife Sites in paragraph 10.26. The two are the same thing and the change of terminology creates confusion and inconsistency. Change paragraph 10.24 so that reference to “County Wildlife Sites” is replaced to “Local Wildlife Sites” (Essex County Council; PSLP936) • Change paragraph 10.24 to read: “and the statutorily protected Local Nature Reserves and” (Essex County Council; PSLP940) • Change paragraph 10.32 (or a new paragraph) to set out the requirement for the applicant to submit a UDC supplied Biodiversity Checklist where there is potential to affect biodiversity. (Essex county Council; PSLP944) • Change to read. "The Council will promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species". The policy statement "Such measures should include making a contribution to the network of biodiversity sites, including open spaces and green infrastructure and water bodies which make links between habitats and support wildlife. Measures should also attempt to link wildlife habitats together, improving access to, between and across them" should include additional wording as follows: "Developments should be expected to deliver net measurable gains in biodiversity." (Essex Wildlife Trust; PSLP1057) • Improve access to open space where a significant opportunity exists to achieve a substantial gain whilst protecting and enhancing the natural environment and reducing the risk of flooding. The integration of Aubrey Buxton Nature Reserve, Alsa Wood and Gall End Meadow to act as a green lung benefit to family recreation would achieve this. (Stansted Mountfitchet Parish Council; PSLP2625)
Policy EN8 Open Spaces	
SUPPORT	1
OBJECT	10
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Following our comments on the previous consultation we welcome the changes to this policy.
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • The penultimate paragraph of the policy is broadly similar to criterion (d) of policy INF2 but the wording is slightly different. First, as this part of the policy is focused on protection of school/college playing fields rather than other open space types it is unclear why the relevant part of policy INF2 is

	<p>broadly repeated in policy EN8 as it is difficult to understand what additionality it offers plus there may be confusion over what policy takes precedence when assessing proposals on school/college playing fields. Furthermore, as the wording of the two policies is slightly different (INF2 refers to just playing fields and EN8 refers to playing fields and other formal sports provision) there is a consistency issue. (Sport England; PSLP67)</p> <ul style="list-style-type: none"> • The policy is effectively a duplication of policy INF 2 so it is not clear to a decision maker which policy is to be applied. (Sworders; PSLP863) • The plan attached to the Regulation 19 draft at chapter 98 however removes a number of green space designations, including almost all of the playing fields on the Friends School site, which is one of the few central green spaces and the only central sports provision. Given the findings of the 2012 Open Space etc document which identified a major deficit in green space of all kinds in Saffron Walden, this must be unsustainable. (WeAreResidents.org; PSLP2259) • POLICIES EN 8 and EN 9 Neither of these policies on Open Spaces or Ancient Woodland and Protected Trees mention the value that such land has as a natural defence against flooding. These policies aim to protect the existing natural environment but fail to meet the NPPF requirement to enhance it. (Saffron Walden Town Council; PLSP2368) • Policy EN8 should include a commitment by the Council for an agreed Epping Forest Mitigation Strategy to be in place by the time the Local Plan is adopted. The policy should also require relevant development to deliver the mitigation measures identified in that Strategy. Natural England is aware that preparation and agreement of the Strategy is dependent upon the findings and mitigation measures identified through the emerging Epping Forest DC HRA. We welcome amendments to address our previous advice, to distinguish the hierarchy of designated sites, as required by paragraph 171 of the NPPF. (Natural England; PSLP2461) • Natural England believes that the Uttlesford Local Plan should include a green infrastructure policy or preparation of Green Infrastructure Strategy for cross-reference within relevant policies. Policy EN8 Open Spaces could be easily amended to include reference to wider green infrastructure issues and requirements to protect and enhance the district's GI network. This will ensure that the plan is consistent with paragraph 171 of the NPPF in taking a strategic approach to GI. (PSLP2567; Natural England) • Refer to full National Trust Representation in File. Hatfield Forest is under significant recreational pressures, caused by increased patronage. (National Trust PSLP2484) • Neither of these policies on Open Spaces or Ancient Woodland and Protected Trees mention the value that such land has as a natural defence against flooding. (Saffron Walden and Little Walden Neighbourhood Plan; PSLP2964)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • To address the potential clarity and consistency issues associated

	<p>with including two similar but slightly different policies relating to developments on school/college sites, it is suggested that a minor modification is made to the plan to remove the penultimate paragraph of policy EN8 and modify criterion (d) of policy INF2 to extend the scope to include “or other formal sports provision on the site” (Sport England; PSLP67).</p> <ul style="list-style-type: none"> • These policies should make mention flood prevention as one of their benefits to be safeguarded. These policies aim to protect the existing natural environment but fail to meet the NPPF requirement to enhance it. Additional policies should be added which reflect this NPPF requirement. (National Trust PSLP2484)
Policy EN9 Ancient Woodland and Protected Trees	
SUPPORT	0
OBJECT	9
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • The Local Plan makes provision for the removal of these trees if the needs and benefits of the development clearly outweigh the loss. How can this be sound when the needs and benefits test is totally subjective and invariably economically biased. (PSPL434) • There will be some smaller areas which are not included (if less than 0.25ha), but would still have ecological value. By stating that all ancient woodland will be shown on the Policies map, the policy wording effectively, but presumably unintentionally, excludes protection of these other areas, which are still “irreplaceable” habitat. (Essex County Council; PSLP948) • Reading the supporting text and policy wording the term “protected trees” in the heading of Policy EN 9 should be replaced with “veteran trees” Some of these may also be protected but it is likely that the majority of the district’s important trees may not be formally protected. The policy wording should also state that where identified UDC will utilise the legislation available to serve Tree Preservation Orders to protect both veteran and other important trees. (Essex county Council; PSLP951) • The NPPF requirement is to enhance the natural environment, not just to ensure no harm, and this should be reflected in the Policy. This section generally also appears to fail to accord with the NPPF requirement for a strategy to enhance the natural and historic environment; we are not aware that UDC has any such strategy, and there is none apparent in the draft Plan. We are also concerned that the Policy EN9 has been significantly weakened from the Reg 18 draft, and now applies only to significant sites and impacts. (WeAre Residents.Org; PSLP2270) • This text needs to be amended to state an FRA is a requirement of the NPPF rather than Environment Agency standing advice. (Environment Agency; PSLP2919)

	<ul style="list-style-type: none"> Neither of these policies on Open Spaces or Ancient Woodland and Protected Trees mention the value that such land has as a natural defence against flooding. (Saffron Walden and Little Walden Neighbourhood Plan; PSLP2965)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Change Policy EN 9 to make it clear that areas of Ancient Woodland that are less than 0.25ha and therefore not on the Policies Map receive the same level of protection as those shown on the Policies Map. (Essex County Council; PSLP948) Policy and supporting text paragraph 10.39 This text needs to be amended to state an FRA is a requirement of the NPPF rather than Environment Agency standing advice. (Environment Agency; PSLP2919) These policies should make mention flood prevention as one of their benefits to be safeguarded. These policies aim to protect the existing natural environment but fail to meet the NPPF requirement to enhance it. Additional policies should be added which reflect this NPPF requirement.(Saffron Walden and Little Walden Neighbourhood Plan; PSLP295)
<u>Policy EN 5 1 Scheduled Monuments and Sites of Archaeological Importance (To be renumbered)</u>	
SUPPORT	0
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> An important Roman temple (a Scheduled Monument) and a number archaeological finds mean the area over which the development would take place has great historic value. Much of this would be permanently damaged (PSLP1011) There is no reference to the test for less than substantial harm in this policy. Given that substantial harm is mentioned, for completeness then this should also be included in the policy. (Historic England; PSLP1890)
MODIFICATION REQUEST	
<u>Policy EN10 Minimising Flood Risk</u>	
SUPPORT	0
OBJECT	6
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Insufficient attention is given within the policy to oblige developers to consider and take responsibility for drainage and water discharge immediately outside the boundaries of their development sites. This is particularly important where developers choose to discharge surface water from their on-site SuDS into nearby watercourses and ditches. (PSLP703) As noted in the Council's Infrastructure Delivery Plan there is an expectation that improvements to the existing foul sewerage networks are expected to be required for the

	<p>allocation sites identified in the Local Plan including the proposed Garden community sites. The information previously provided by Anglian Water also identified potential constraints at existing water recycling centres (formerly sewage treatment works) to accommodate specific allocation sites which would need to be aligned with further investment through Anglian Water’s Business Planning process. Policies EN10 and EN11 refer to risk of flooding from fluvial and surface water flooding but not sewer flooding. Similarly the allocation policies for Anglian Water area do not include reference to this issue with the exception of the garden community policies. (Anglian Water; PSLP913)</p> <ul style="list-style-type: none"> • he NUGC would alter the pattern of water-flow for the River Cam downstream fundamentally, substantially and unpredictably."The science of climate change suggests an even greater risk of flooding in the future and therefore there is an exceptional duty on councils, planners and developers to offer more than flimsy assurances, unsupported by evidence. (PSLP1002) • Flooding With 5000 new homes, together with the hard standing areas this will result in, there will be significant run-off from this development. Development in this location has the potential to increase the level of flood risk from the River Cam downstream by increasing surface water run-off. (PSLP1768) • Anglian Water is largely supportive of policy EN10 which is intended to ensure that no increased risk of flooding to existing properties. However it is focused on fluvial sources of flooding and does not include reference to sewer flooding or sewage treatment consistent with Council’s Water Cycle Study and Infrastructure Delivery Plan. (Anglian Water; PSLP2516)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • We would recommend that Policy EN10 includes specific reference to foul sewerage systems and the potential risk of flooding from this sources. Therefore it is suggested that Policy EN10 include the following additional text: “Development proposals should demonstrate that adequate foul water treatment and disposal already exists or can be provided in time to serve the development” (Anglian Water; PSLP913) • We would recommend the following text to prevent confusion over (3a) and 3b: "All proposals for development of 1 hectare or above in Flood Zone 1 and for development in Flood Zones 2 and 3 must be accompanied by a flood risk assessment that sets out the mitigation measures for the site and agreed with the relevant authority. Development in these flood zones must accord with those categories in Table 3 Flood Risk Vulnerability Classification, which are described as appropriate for this Flood Zone". (Environment Agency; PSLP2920)
Policy EN11 Surface Water Flooding	
SUPPORT	4
OBJECT	2

SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> We support the requirement to use SuDs and that alternative method of surface water disposal will only be considered where it is demonstrated that there are no reasonable alternatives. This is consistent with the surface water hierarchy and would help to ensure that new development does not increase the risk of surface water and sewer flooding. (Anglian Water Services; PSLP871) A strategy of Green Infrastructure provision to adapt to or mitigate the effects of Climate change needs to be developed for the Garden Settlements to include Sustainable urban Drainage Systems and to increase biodiversity. This infrastructure can also encourage walking, cycling and other health and wellbeing activities (Sustainable Uttlesford; PSLP1524)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> SUDs systems in close proximity of safeguarded aerodromes can pose a bird hazard risk which may affect the safe and efficient operation of aerodromes and aircraft, as detailed in The Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction 2002. (MAG; PLSLP1524) Run-off from new developments into open water courses should be prohibited wherever possible if the water course leads into a drainage system. A provision should be included whereby developers are under a continuing obligation to maintain water courses which discharge into a drainage system. The penultimate paragraph should be amended to include a stipulation that developments within 10 kms of Stansted Airport must be referred to the Airport authority. (Elsenham Parish Council; PSLP337)
MODIFICATION REQUEST	<ul style="list-style-type: none"> The paragraph should be amended to read: SUDs systems should be designed so as not to increase the bird hazard risk or affect the safe operation of London Stansted Airport or the movement of aircraft; where appropriate the implementation of a long term maintenance of SUDS plan and of a bird hazard management plan will be secured by condition or planning obligation. (MAG; PLSLP1524)
Policy EN12 Protection of Water Resources	
SUPPORT	0
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Water supply shortage. I would like to draw the following to the Inspector's attention: The predicted water consumption figures in these documents already factor in water saving measures and best building practices. Nevertheless, water consumption for the district needs to increase according to the Arcadis report by about 1.3m tonnes a year. Neither the Hyder report nor their successor Arcadis say where this would come from. There is a reference to it

	<p>coming from “the west”. There is no explanation of this or evidence to support its viability. The requirement in the report only runs to 2033. However the new settlements if adopted in the Plan will need to be built out. So just counting up to 2033 is not valid. (PSLP2540)</p> <ul style="list-style-type: none"> It would appear that the Local Plan should be brought up-to-date to reflect the New Connection Charging process implemented in April 2018, in line with OfWat guidance. (Bovis Homes; PSLP2575)
MODIFICATION REQUEST	<ul style="list-style-type: none"> This process sets out how off-site sewerage and wastewater supply capacity is provided, levying a fixed New Connection Charge on the developer, with the upgrade works to be provided and funded by the water provider (rather than planning obligations being sought from a developer to fund any off-site works as is currently indicated in the policy). (Bovis Homes; PSLP2575)
Policy EN13 Minerals Safeguarding	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> The policy is too onerous and not in accordance with the Framework. A blanket policy seeking to refuse development where it is demonstrated that minerals will be sterilised is contrary to this guidance as an exercise should be carried out to assess whether it is practicable and feasible to extract the mineral before a decision can be made on the application. (PSLP 2817)
MODIFICATION REQUEST	
Policy EN14 Pollutants	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<p>Natural England is generally satisfied that the policies incorporate sufficient requirements to ensure no adverse impact to the natural environment through development of contaminated land and pollution. Policies also offer adequate protection of water-dependent designated sites. The Environment Agency as lead authority needs to advise on the soundness of the policies. (PSLP2463 Natural England)</p>
MODIFICATION REQUEST	
Policy EN15 Air Quality	
SUPPORT	0
OBJECT	12
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> This policy says that development should be permitted where it can be demonstrated that it does not lead to significant adverse effects on health, the environment, or amenity. By implication, adverse effects on health, the environment and amenity are

	<p>permitted as long as they are smaller than significant. (Saffron Walden and Little Walden Neighbourhood Plan; (PSLP2967)</p> <ul style="list-style-type: none"> • The Regulation 19 Consultation Document has a lack of evidence base behind it including lack of an Air Quality assessment. Air pollution in the district has exceeded legal limits in almost every single year for the last 10 years. An Air Quality Technical Assessment guide was published as part of the evidence but this is not a substitute for a proper Air Quality assessment to establish whether Policy allocations are sustainable locations and this should be done at a strategic level. The January to June 2018 NO2 mean is 40.63mcg per cubic metre and this is over the legal limit of 40mcg. In Newport, taking into account permitted development not yet built and application in progress the forecast for the annual mean will reach 54mcg. The air quality breach is not only in Saffron Walden but along the B 1383 corridor and similar high readings in Stansted Mountfitchet. (PSLP 3006) • The plan has no Environmental Impact Assessment for the extra traffic pollution created by new settlements and further allocations in towns and villages. Air pollution in the district has exceeded legal every year for the past 10 years. Air quality assessment for the plan should be done at a strategic level. Audited nitrogen dioxide levels in Saffron Walden have been illegal since 2011 and worsening. Traffic from the new settlements will add to the pollution in Saffron Walden. The air quality breach is not only in Saffron Walden but along the B 1383 and Stansted Mountfitchet. The Sustainability assessment for the Plan makes this comment against policy EN15 (PSLP 2538) • Increases to air pollution not addressed sufficiently in the plan and these will increase sharply due to increased traffic levels that will breach legal requirements (PSLP 1523) • Whilst this policy incorporates general requirements for development to demonstrate no adverse impact to the natural environment, through emissions to air, we are not satisfied that these offer adequate protection to air quality sensitive designated sites. Risk to designated sites, particularly Epping Forest SSSI, SAC and Hatfield Forest SSSI, through traffic related emissions to air, is a key issue for the Uttlesford Local Plan as detailed in our comments throughout the consultation process and highlighted in the HRA and SA. In order to be considered sound and compliant with legal and national planning policy requirements to protect designated sites, Policy NE15 must acknowledge potential risks to Epping Forest and Hatfield Forest, and other designated sites, and include a commitment to address any adverse effects in accordance with our detailed advice on policies SP8, SP11 and EN7. As currently worded Natural England considers Policy NE15 to be unsound. The above policy requirements should be implemented to ensure that the policy is compliant with legal and national planning policy obligations. (Natural England; PSLP 2465) • The 2017 Air Quality Annual Status Report states that traffic emissions are the most significant source of air pollution within the district and within Saffron Walden. Due to exceedances in Nitrogen Dioxide (NO2) levels UDC had to declare an Air Quality
--	---

	<p>Management Area (AQMA) within Saffron Walden town centre and have done so for some years. (PSLP 1627)</p> <ul style="list-style-type: none"> • This policy says that development should not be permitted where it can be demonstrated that it does not lead to significant adverse effects on health, the environment, or amenity. By implication, adverse effects on health, the environment and amenity are permitted as long as they're smaller than significant (PSLP 2371). • The air quality within Uttlesford is already in breach of national guidelines and safety limits. There is nothing in the local plan to indicate how this will be addressed with the additional traffic produced by the development of a new garden community.(PSLP 1111) • The supporting evidence for the plan does not include an overall Air Quality Assessment. Thus it is impossible to judge whether the selected sites for development are the most sustainable. EN15 The policy does not reflect the NPPF requirement to consider the cumulative effect of development on air quality. Individual assessments by applicants do not fulfil this requirement. (PSLP 695) • Significant shortage of open space in Stansted Mountfitchet not addressed in plan as well as no specific proposals on footpaths, cycle ways, reduction in traffic flows (indeed the opposite) or reducing unacceptable levels of air pollution. , An immediate requirement would be to establish an Air Quality Management Plan. Traffic management policies will be critical in reducing emissions. (PSLP 2624) • The Local Plan has no Air Quality Assessment. No Air Quality Assessment has been performed, despite the continuing illegal pollution levels, and despite the Regulation 19 draft proposing material new development in and near Saffron Walden. (PSLP 2598) • 157. Paragraph 10.57 is clearly wrong – the most recent UDC monitoring results show 4 junctions at which NO2 limit values are breached, and this should be clearly stated. The legal NO2 levels have been breached in almost every single year for the last 10 years; given the clearly identified impact of air pollution on human health, we cannot understand why the Council will not acknowledge the current position or take steps to address it. We largely support the wording of Policy EN15, which is now greatly improved from the Reg 18 draft. However, it is still contrary to the NPPF in that it fails to take account of the cumulative impact of developments on air pollution – policy EN15 needs to be amended to reflect this, and in addition the Regulation 19 draft needs to be supported by a proper AQA assessing the cumulative impact of all proposed development on areas where air pollution is an issue to determine whether or not the Regulation 19 draft plan allocations are sustainable.(PSLP 2271)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • The Neighbourhood Plan insists on better protection for its residents and would like the policy to be re-worded to remove the word “significant”(PSLP 2967) • Take out 600 houses from the total right now. Need to stop, look and remove from the plan those sites which will add most illegal

	<p>pollution to the existing illegality.(PSLP 2538)</p> <ul style="list-style-type: none"> • Air pollution and measures to combat air pollution needs to be addressed. The numbers of houses required is in sharp contrast to the numbers being built at it is developer led, which will mean the majority will be built for profit not local need. Other options for building houses only reflective of housing need on a local level must be explored as many more houses will create increased traffic and potentially illegal levels of air pollution. (PSLP 1523) • The Town Council insists on better protection for its residents and would like the policy to be re-worded to remove the word “significant” (saffron Walden Town council; PSLP2371) • Ensure, following stringent monitoring of emission levels, that policies to prevent the adverse health impact of air pollution, not least in schools, are introduced (Stansted Mountfitchet Parish Council; PSLP 2624)
Policy EN16 Contaminated Land	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Natural England is generally satisfied that the policies incorporate sufficient requirements to ensure no adverse impact to the natural environment through development of contaminated land and pollution. Policies also offer adequate protection of water-dependent designated sites. The Environment Agency as lead authority needs to advise on the soundness of the policies.
MODIFICATION REQUEST	
Policy EN17 Noise Sensitive Development	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
Policy EN18 Light Pollution	
SUPPORT	0
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • At present, the night skies in the area enjoy a good amount of darkness compared to many parts of the country, but increased development has already led to growing levels of light pollution that detract from the rural environment and threaten wildlife. A hillside development of the scale proposed would cause a devastating level of light pollution that would create a

	<p>predominantly suburban night-time atmosphere in the area. The importance of the night-sky and night-time darkness for the sense of space in the countryside together with the well-being of residents should not be underestimated, but there is no evidence that this has been considered as part of the decision making process behind the NUGC proposal. (PSLP672)</p> <ul style="list-style-type: none"> • The proposed NUGC development on a hilltop and hillsides is contrary to the traditional pattern of settlements in Uttlesford. The proposed will be highly visible, development will create light pollution and no mitigation thorough tree-planting or limiting house heights would lessen the impact. The location of NUGC will encourage reliance on cars and trains. The development will contribute to flooding further down the valley. The proposed development is on prime agricultural land. The site contains important archaeology, a scheduled monument and prehistoric paths.(PSLP 1055)
MODIFICATION REQUEST	

<i>Uttlesford District Council Regulation 19 Pre-submission Local Plan; Summary of Responses</i>	
Section / Paragraph / Policy	Summary of Responses
11. Countryside	
SUPPORT	0
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • The plan is a response to government numbers and sees the solution through the provision of Garden Communities that are not deliverable. Should the Garden Community proposals proceed urbanisation will spread from Tendring to Gilston in East Hertfordshire resulting in loss of the countryside. (PSLP 747) • Being located on rolling hills the North Uttlesford Garden Community would destroy the landscape visual beauty and be visual from a wide area including neighbouring Cambridgeshire villages and passing M11 traffic. The unique architectural heritage will be destroyed as well. (PSLP 728) • North Uttlesford Garden Community will permanently destroy the uplands, the skyline, good quality agricultural land and add to urbanisation of what is currently essentially a rural landscape and rural communities. The site is highly visible and no amount of landscaping or planting of trees will hide the development (PSLP 660) • The scale of the proposed development will have a significant adverse impact on local wildlife which is already under threat from pollution, light pollution, drought, building, road traffic, hunting and industrial farm practices. (PSLP 49)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • UDC should finance and install road traffic calming measures in local villages to slow down traffic from rat runners (PSLP 49)
<u>Policy C1 Protection of Landscape Character</u>	
SUPPORT	0
OBJECT	6
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Unjustifiable site selection including selection of North Uttlesford Garden Community; proposed development on the hillsides is at odds with historic developments in the valleys; and • The site cannot accommodate the development without causing significant and unacceptable harm to the important visual qualities of the site and wider landscape. No adequate mitigation is possible. (PSLP 2014) • North Uttlesford Garden Community development will result in a change of character on a huge scale unsupported by investment in infrastructure or local services. (PSLP 1978) • Policy effectively prevents any development that has a view which is inconsistent with national policy which requires protection of valued landscape; and

	<ul style="list-style-type: none"> • There are outstanding issues with neighbouring authorities regarding elements of the Plan that must be addressed in order for the Council to confirm that it complies with the duty to co-operate. (Grant and Bloor Homes, PSLP 2910) • Policy C1 is not framed in line with guidance set out in the framework as it does not provide for a planning balance exercise to be undertaken by the decision maker. (Gladman PSLP 2818) • Policy not supported (Stansted Mountfitchett Parish Council PSLP 2627) • Historic England welcomes this policy but requests the deletion of the word 'material' from bullet point 6. This policy would appear to be at odds with some of the proposals in the plan, most notably the North Uttlesford Garden Community (Historic England, PSLP 1894)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Policy C1 and its supporting text should be deleted in its entirety. • Policy C1 should be reworded to allow the decision maker to undertake a Framework compliant planning balance exercise so that failure to meet any one of the criteria listed would not automatically mean failure to conform with the policy overall (Gladman PSLP 2818) • Amendment to Policy C1 paragraph 6 to read “No material harm is caused to the SCALE, form and alignment of protected historic lanes” (Stansted Mountfitchett Parish Council PSLP 2627) • Deletion of the word 'material' from bullet point 6. This policy would appear to be at odds with some of the proposals in the plan, most notably the North Uttlesford (Historic England, PSLP 1894)
Policy C2 Re-use of Rural Buildings	
SUPPORT	1
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • While sound, it would be positive to include a further policy caveat to state that development should protect or enhance the significance of designated and non-designated heritage assets (Essex County Council PSLP 952)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Objection on the basis that it is unduly restrictive and is not consistent with national policy. Specifically, “permanent and substantial construction” is only a Green Belt test so should not be applied to buildings outside of the Green Belt. This would conflict with paragraph 55 of the NPPF which applies no such test; • The draft policy wording is too restrictive and will prevent sustainable development from coming forward. The policy is therefore contrary to national policy and requires revision; and • The reference to a potential requirement for additional buildings is not in accordance with national policy as it places additional policy burdens on the applicant, not supported by the NPPF. Applications for additional buildings should be assessed on their own merits.(Sworders 865)

MODIFICATION REQUEST	<ul style="list-style-type: none"> UDC may wish to change Policy C 2 to include an additional point to the policy: “The development would protect or enhance the significance of designated and non-designated heritage assets, including the contribution made by their setting and/or group value.” (Essex County Council PSLP 952) Delete point 1; and Delete from point 4 “and the buildings loss would not result in additional buildings being required. (Sworders 865)
Policy C3 Change of Use of Agricultural Land to Domestic Garden	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
Policy C4 New Community Facilities Within the Countryside.	
SUPPORT	1
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> The policy recognises that in principle outdoor sports facilities may be justified in the countryside beyond development limits of settlements (Sport England PSLP 69)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> We again suggest that such provision should conserve and enhance the historic environment. The recent example of pre-school provision outside the development limits of Great Chesterford is one such example where in our view insufficient protection has been afforded to the historic environment. (Historic England PSLP 1896)
MODIFICATION REQUEST	<ul style="list-style-type: none"> We again suggest that such provision should conserve and enhance the historic environment. (Historic England PSLP 1896)

<i>Uttlesford District Council Regulation 19 Pre-submission Local Plan; Summary of Responses</i>	
Section / Paragraph / Policy	Summary of Responses
12. Site Allocations	
SUPPORT	0
OBJECT	25
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • The Local Plan identifies a number of assets that would affect heritage assets. The need to protect such assets should be identified in the policy. (PSLP1898 Historic England) • All relevant Local Plan allocations which will have air pollution impacts on Epping Forest SAC or Hatfield Forest SSSI and / or are within the ZoI for Hatfield Forest SSSI for recreational pressure impacts, alone or in-combination should be identified through the SA and HRA where appropriate. The SA should recommend policy requirements to ensure the delivery of any agreed mitigation measures. The SA should assess impacts and identify recommendations to address potential adverse effects to designated sites, and contribute towards priority habitat enhancement, through a requirement in Policy EN7. (PSLP2468 Natural England) • Sites falling within the 10.4Km ZoI around Hatfield Forest do not list proximity to Hatfield Forest as a constraint. (PSLP2490 National Trust) • In the allocation policies. , the Plan asks for a Landscape and Visual Impact Assessment (LVIA) on developments which is welcome in spirit but this term only applies to sites which require an Environmental Impact Assessment. This has come about because in an Assessment (LVIA) landscape architects are asked to assess the significance of landscape and visual effects; it was considered that if the significance was assessed as moderate or severe, then it might trigger the need for an EIA which was probably unnecessary. For non EIA sites a Landscape and Visual Appraisal is required which is a narrative response and significance is not assessed. Some of the sites may well require an EIA but most won't. (PSLP2636 Stansted Mountfitchet PC) • It would assist the reader to include an "introduction" to the site allocations chapter of the Local Plan, as done for other chapters. This would explicitly state that the Local Plan in its entirety applies, as well as the site specific requirements; and provide a clear link to Policy INF 1 to capture all infrastructure requirements (PSLP956 ECC) • In the site allocation section, some residential site allocations policies require ecology surveys while others do not. It is not clear why there is a distinction but this implies that for those sites where it is not listed, an ecological survey is not required. While the potential for impacts are presumably lower, it is not necessarily the case that they will not need a survey. (PSLP958 ECC) • Plan fails to take account of the benefits both in terms of delivery

	<p>and sustainability that an allocation to the south of Beldams Lane, Bishop's Stortford (Great Hallingbury Parish) for up to 180 dwellings could have on its effectiveness. (03GtHal15)(PSLP192 Bloomhall)</p> <ul style="list-style-type: none"> • Plan fails to include sites in a number of sustainable settlements and Type A Villages. (PSLP1325 Landhold Capital) (PSLP2189 J Harrison) (PSLP2711 Battlement Trust) (PSLP2767 Strutt & Parker Farms) (PSLP2990 R Coke) (PSLP2993 Landhold Capital) • Reliance on the three Garden Communities identified is unsound (PSLP2730 Baker and Metson) • Omission: Land at Great Canfield Road, Great Canfield is a site of 8.25ha and suitable for a development of 135 dwellings. (04GtCan15) (PSLP2820 Gladman) • Omission: Land at Station Road Flitch Green Little Dunmow Parish is a site of 11.52 dwellings and suitable for development. (NEW) (PSLP2821 Gladman) • Omission of identifying land at Chickney Road, Henham for residential development (07Hen16)(PSLP2991 R Coke) • Omission of identifying land at Mill Road Henham for residential development (05Hen15) (PSLP2994 Landhold Capital) • Object to omission of land at School Lane, Henham for residential allocation (04Hen15) (PSLP2688 Persimmon Homes) • Omission of 8.5 ha site at Birchanger north of Sion House CM24 8TS (NEW) (PSLP38 Newton Associates) • Omission of site at 328 Birchanger Lane, Birchanger. The Green Belt boundary in this location does not follow any physical feature that is recognisable on the ground, therefore its permanence is questioned. (10Bir17)(PSLP1586 S Del Federico) • Object to omission of land (06HBO15) south of Newbury Meadow, Off Cage End Road Hatfield Broad Oak for development. (PSLP36 J Lukies) • Object to omission of 1.2 ha land north of Hammonds Road Hatfield Broad Oak for 24 dwellings (08HBO17) (PSLP2537 H Turtill) • Object that no sites are allocated in Hatfield Broad Oak (PSLP2709 Stonebond Properties) • Object to no residential allocations in Hatfield Heath (08HHea17) (09HHea17) (PSLP2531 Pelham Structures) (PSLP2577 D Sargeant) • Object to omission of land north of Cornells Lane Widdington (02Wid15) (PSLP1615 Stonebond Properties) • Object to lack of small sites being allocated (PSLP3057 S Barker)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Expect to see more detail regarding the sites and policy criteria to indicate how the decision maker should react (para 154 and 157 of the old NPPF, para 16d and 20d of the new NPPF). We request that you review these allocations again, identifying whether there are any heritage assets (or their settings) that would be affected by the proposed development. Where a potential impact is identified, wording should be included in the policy and supporting text to this effect. WE suggest the inclusion of additional bullet point in

	<p>the site allocation. (PSLP1898 Historic England)</p> <ul style="list-style-type: none"> • The policies promoting allocations which will have air pollution impacts on Epping Forest SAC or Hatfield Forest SSSI and / or are within the ZoI for Hatfield Forest SSSI for recreational pressure impacts, alone or in-combination should include a requirement for a contribution towards implementation of the agreed mitigation strategy. We accept that these have yet to be agreed for Epping Forest and Hatfield Forest; however, a commitment to delivering the measures once agreed should be explicit within the policy. (PSLP2468 Natural England) • The following policies should identify their proximity to Hatfield Forest as a constraint (DEB1, ELS1, GtDUN 1, GtDUN 2, GtDUN3, GtDUN 4, GtDUN 5, GtDUN 11, GtDUN11, GtEAS 1, QUE 1, STA 1, TAK 1, TAK 3, THA 1) (PSLP2490 National Trust) • Amend reference of Landscape and Visual Impact Assessment to 'Landscape and Visual Appraisal, or Landscape and Visual Impact Assessment'. (PSLP2636 Stansted Mountfitchet PC) • Recommend including the following text as an Introduction to the Site Allocations chapter. "The site allocations policies identify areas for development and contain site specific requirements for the management of any site constraints, infrastructure and mitigation. These will be required in addition to general requirements for infrastructure contained in Policy INF 1, and all other relevant policies in this Local Plan. Policy INF 1 highlights general issues concerning infrastructure provision and developer contributions that affect proposals across the District and are essential to ensuring that new development adequately mitigates its impact on the surrounding area and makes a positive contribution to its character and amenity." (PSLP956 ECC) • It is recommended that a review of site allocations requirements is undertaken to ensure all relevant sites undertake an ecology survey. (PSLP958 ECC) • Allocate land south of Beldham's Lane Bishop's Stortford (Great Hallingbury Parish) for 180 dwellings (03GtHal15) (PSLP192 Bloomhall) • Allocate land at Mill Road Henham as a residential site (05Hen15) (PSLP1325 Landhold Capital) (PSLP2993 PSLP2994 Landhold Capital) • Allocated land east of Sparepenny Lane Great Sampford (01GtSam15) for 10-15 dwellings (PSLP2189 J Harrison) • Allocated Chelmer Mead Little Dunmow as an additional strategic site (03LtDun15) (PSLP2730 Baker and Metson) • Allocate land north of Stewards Way Manuden (02Man16)(PSLP2711 Battlement Trust) • Allocate land in Leaden Roding (01LRod15) (PSLP2767 Strutt & Parker Farms) • Allocate land at Great Canfield Road, Great Canfield (04GtCan15)(PSLP2820 Gladman) • Allocate land east of Station Road Flitch Green Little Dunmow Parish.(NEW) (PSLP2821 Gladman) • Allocate land at Chickney Road Henham (07Hen15) (PSLP2990
--	---

	<p>PSLP2991 R Coke)</p> <ul style="list-style-type: none"> • Allocate Land at School Lane Henham for residential (04Hen14) (PSLP2688 Persimmon Homes) • The development site at Birchanger, north of Sion House Birchanger Essex, CM24 8TS should be included on the inset maps. (NEW) (PSLP38 Newton Associates) • A full review of the Green Belt boundary in Birchanger as suggested to include the land associated with 328 Birchanger Lane within the development limits of Birchanger and excluded from the Green Belt. (10Bir17) (PSLP1586 S Del Federico) • Either allocate land south of Newbury Meadow, Off Cage End Road Hatfield Broad Oak or extend the development limits to include the land. (06HBO15) (PSLP36 J Lukies) • Allocated 1.2 ha of land north of Hammonds Road Hatfield Broad Oak for 24 dwellings.(08HBO17) (PSLP2537 H Turtill) • Allocated land south of Cannons Lane Hatfield Broad Oak (NEW)(PSLP2709 Stonebond Properties • Allocate land west of Mill Lane Hatfield Heath for residential development (09HHea17) (PSLP2531 Pelham Structures) • Allocate Land at High Pastures and Land East and West of Mill Lane Hatfield Heath. (08HHea17) (09HHea17) (PSLP2577 D Sargeant) • Land north of Cornells Lane Widdington be allocated for residential development (02Wid15) (PSLP1615 Stonebond Properties) • Allocated land at Little Garnets High Easter Parish for residential development or retirement village (NEW) (PSLP3057 S Barker)
13 Clavering	
SUPPORT	
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Omission of land west of Clavering Primary School as development site.(07Cla15) (PSLP2527 Pelham Structures) • Insufficient housing allocated to Type A village of Clavering. (PSLP711 J Noble) (PSLP2877 EA Securities)
MODIFICATIONS REQUEST	<ul style="list-style-type: none"> • Allocate of land rear of Clavering Primary School, Stortford Road, Clavering, for residential development. .(07Cla15) (PSLP2527 Pelham Structures) • Allocate sites 04Cla15 and 05Cla15 in Clavering for residential development. (PSLP711 J Noble) • Allocate land to the west of The Cricketers (09Cla15) (PSLP2877 EA Securities)
13. Clavering CLA 1 (Land south of Oxleys Close)	
SUPPORT	1
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Development at the scale proposed is unlikely to have a sever affect upon the Strategic Road Network (PSLP3029 Highways England)
SUMMARY OF	<ul style="list-style-type: none"> • The site is located to the north of the Grade II listed Clavering Hall,

REPRESENTATIONS IN OBJECTION	<p>and is adjacent to Stortford Road. Stortford Road is a Roman road which increases archaeological potential. 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 grade II listed Clavering Hall and its setting, and consider archaeological potential. (PSLP1899 Historic England)</p> <ul style="list-style-type: none"> • Allocations could have an adverse impact on Quendon Wood SSSI through air and water quality impacts. This area is located within the Lea and Stort Valleys, a priority area for measures to connect fragmented wildlife sites, improve management of priority habitats and species while using the natural assets of the river valleys and wider landscape to help enhance the lives of local people through improved greenspace. (PSLP2469 Natural England) •
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Amend policy to to preserve the grade II listed Clavering Hall and its setting, and consider archaeological potential. (PSLP1899 Historic England) •
14. Debden DEB 1 (Land west of Thaxted Road)	
SUPPORT	1
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Development at the scale proposed is unlikely to have a sever affect upon the Strategic Road Network (PSLP3030 Highways England)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • There are a number of Grade II listed structures to the north and south of the site, these are primarily located in the settlement to the north of site. Development at the site is likely to impact upon those assets to the south, namely Miller's Farmhouse, barn at Miller's Farm, Water Hall, and Broctons Farmhouse (all Grade II listed). (PSLP1900 Historic England) • Allocations could have potential impacts to Debden Water SSSI through air and water quality impacts. (PSLP2470 Natural England) • Object to allocation – loss of agricultural land; scale; inadequate infrastructure; distant from key services; air quality impacts; flood risk; visual impact; traffic;. (PSLP1708 J Collins) (PSLP1945 I Carter)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • It is important that any development will need to preserve the listed buildings including Miller's Farmhouse, barn at Miller's Farm, Water Hall, and Broctons Farmhouse (all Grade II listed) and their settings. These requirements should be included in the policy and supporting text of the Plan. (PSLP1900 Historic England) • Delete allocation (PSLP1708 J Collins) (PSLP1945 I Carter)
15 Elsenham	
SUPPORT	
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Any development coming forward should provide either a Transport Assessment or Statement carried out in accordance with current guidance and best practice, any applicant is strongly recommended to seek guidance before undertaking the work, if a

	<p>significant impact is identified this will need to be mitigated.(PSLP3031 Highways England)</p> <ul style="list-style-type: none"> • Suitable sites not allocated (PSLP2855 Pegasus) (PSLP2854 Crown Estate) (PSLP2758 Crown Estate) • Elsenham Industrial Estate, Gaunts End is within Stansted Airport Countryside Protection Zone, and as such it should not attract further development. (PSLP281 Elsenham PC) • Development through allocations, including Policy ELS4 Elsenham Nurseries Stansted Road, could have potential impacts through air and water quality mediated effects, on Thorley Flood Pound SSSI, Debden Water SSSI, Elsenham Woods SSSI, Little Hallingbury Marsh SSSI, and Quendon Wood SSSI. This area is located within the Lea and Stort Valleys, a priority area for measures to connect fragmented wildlife sites, improve management of priority habitats and species while using the natural assets of the river valleys and wider landscape to help enhance the lives of local people through improved greenspace. (PSLP2741 Natural England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Include reference to Transport Assessment or statement in policy for sites in Elsenham. (PSLP3031 Highways England) • Allocated sites in Elsenham SLAA reference 03Els15 and 04Els15. (PSLP2855 Pegasus) • Allocate Land to the west of Station Road Elsenham for about 70 dwellings (03Els15) (PSLP2754 the Crown Estate) • Allocate Land to the north of Stansted Road for approximately 40 units.(04Els15)(PSLP2758 Crown Estate) • Make clear in policy that Elsenham Industrial Estate, Gaunts End cannot attract further development, as it is within the Stansted Airport Countryside Protection Zone. (PSLP281 Elsenham PC)
15. Elsenham ELS 1 (Land south of Rush Lane)	
SUPPORT	2
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Support allocation (PSLP2286 Rosconn Strategic Land)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Currently no mention of heritage assets in policy. There are a number of Grade II buildings in close proximity to the north and south of the proposed site, in addition the Grade I listed Church of St Mary the Virgin is located further to the east to the site. Any development of the site therefore has the potential to impact upon these heritage assets. (PSLP1902 English Heritage) • The Archaeological Assessment of allocated sites (February 2018) indicated that the site may contain archaeological deposits which will need to be considered by future development proposals, through an archaeological evaluation. (PSLP961 ECC) • Description of site inaccurate. The site is subject to a number of constraints (PRoW; access; landscape character; poor air quality; railway line; overhead power lines; flood zones; proximity to airport restricting SuDS; impact on development at Sawmill; housing capacity of Elsenham (PSLP340 ElsenhamPC) • Object to allocation as Elsenham is unsuitable for development; impact on CPZ; traffic. (PSLP2546 M Shaw)(PSLP1607 E Kay)

MODIFICATION REQUEST	<ul style="list-style-type: none"> 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.(PSLP1902 English Heritage) If policy not deleted that additional point “6. Housing mix is to be subject to local consultation. As a guide, it is anticipated that one-third of the dwellings will be bungalows, in order to make good the deficiency in provision for the elderly in the village.”(PSLP340 Elsenham PC) Additional point “An appropriate Archaeological Assessment will be required” (PSLP961 ECC) Delete allocation (PSLP2546 M Shaw) (PSLP1607 E Kay)(PSLP340 Elsenham PC)
15. Elsenham ELS 2 (Land west of Hall Road)	
SUPPORT	1
OBJECT	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Support allocation. (PSLP2574 Bovis Homes)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Currently no mention of heritage assets in policy. There are a number of Grade II listed buildings to the immediate north, east and west of site with the Grade I listed Church of St Mary the Virgin located further to the south east. Any development of the site therefore has the potential to impact upon these heritage assets. (PSLP1903 Historic England) Policy omits reference to existing S106 agreement referring to community facility contribution; and housing mix. (PSLP341 Elsenham PC) Object to allocation as Elsenham is unsuitable for development. (PSLP2544 M Shaw)
MODIFICATION REQUEST	<ul style="list-style-type: none"> 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. (PSLP1903 Historic England) Description include “Hall Road to east and Stansted Brook to south” (PSLP341 Elsenham PC) Additional point s <ul style="list-style-type: none"> 6. A Community Facilities Contribution not exceeding three hundred and ten thousand pounds (£310,000) shall be made by way of part contribution towards the cost of a new Community Hall in Elsenham. 7. Housing mix is to be subject to local consultation. As a guide, it is anticipated that one-third of the dwellings will be bungalows, in order to make good the deficiency in provision for the elderly in the village. (PSLP341 Elsenham PC) Delete allocation (PSLP2544 M Shaw)
15. Elsenham ELS 3 (Land north of Leigh Drive)	
SUPPORT	0
OBJECT	1
SUMMARY OF	

REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> The site has detailed planning permission and is under construction. (PSLP279 Elsenham PC)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Update policy. (PSLP279 PC)
15. Elsenham ELS 4 (Residential Commitments)	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Policy omits total capacity of sites. (PSLP342 Elsenham PC)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Amend the data to state the totals for each site (PSLP342 Elsenham PC)
16 Felsted	
SUPPORT	1
OBJECT	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Development at the scale proposed is unlikely to have a sever affect upon the Strategic Road Network (PSLP3032 Highways England)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Development through allocations could have potential air and/or water quality impacts on Garnetts Wood/Barnston Lays SSSI. (PSLP2472 Natural England) The plan makes insufficient provision of small to medium sites.(PSLP2873 Catesby Estates) It is a war of attrition in Felsted. Non-stop planning applications to extend the village into a conurbation with other new housing. Felsted Brook is already being destroyed by polluted runoff waste water. The village B road is already swamped with motor traffic (PSLP716 C Turvey) Omission of land west of Maranello, Watch House Green as development site (16Fel15) (PSLP1625 Landvest Development)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Allocated both land at Braintree Road and the land east of Chelmsford Road, Felsted as logical extensions to the village in sustainable locations.(13/14Fel15) (PSLP2873 Catesby Estates) Allocate land west of Maranello Watch House Green fore residential development. (16Fel15) (PSLP1625 Landvest Development)
16. Felsted FEL 1 (Land North of Station Road)	
SUPPORT	1
OBJECT	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> The site is identified in the emerging Neighbourhood Plan and therefore supported providing it is delivered in accordance with the final Neighbourhood Plan, including the identified community benefit of a Doctors' Surgery together with appropriate parking, both to be gifted to the community.(PSLP733 Felsted PC)
SUMMARY OF	<ul style="list-style-type: none"> The allocation is close to the historic core of Felsted and has the

REPRESENTATIONS IN OBJECTION	<p>potential to impact on Conservation area. The Archaeological Assessment of allocated sites (February 2018) indicated that the site may contain archaeological deposits which will need to be considered by future development proposals, through an archaeological evaluation. (PSLP962 ECC)</p> <ul style="list-style-type: none"> • Currently no mention of heritage assets in policy. The Felsted Conservation Area lies to the east of the site and includes a number of listed buildings including the grade I listed Church of the Holy Cross. Any development should protect any key views of the church. (PSLP1904 Historic England) • Object to policy due to traffic, highways danger, light pollution, aircraft noise, sewage plant. (PSLP50 R Sudlow) • Policy is supported but policy area should include open land to the north (PSLP1601 J Young)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Add additional point “An appropriate Archaeological Assessment will be required” (PSLP962 ECC) • Any development should protect any key views of the church. These requirements should be included in the policy and supporting text of the Plan.(PSLP1904 Historic England) • Delete policy (PSLP50 R Sudlow) • Inset Map should be amended to include the area of land that is proposed to be utilised as open space which lies immediately to the west and is within the same ownership.(PSLP1601 J Young)
16. Felsted FEL 2 (Land east of Braintree Road)	
SUPPORT	1
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Policy is supported (PSLP922 Springfield Planning)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Object to site as it offers no community benefit specifically for residents of Felsted. Planning permission has been refused for development of the site.(PSLP733 Felsted PC) • Currently no mention of heritage assets in policy. There are three grade II listed buildings or structure to the north and north west of the site (Weavers, Felmoor Farmhouse and a Pump. Any development of the site has the potential to impact upon the setting of these heritage assets. (PSLP1906 Historic England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Delete policy and replace with allocation of land at Sunnybrook Farm with land for parking for the school (NP reference HN2 Site A UDC SLAA ref 20Fel15) (PSLP733 Felsted PC) • Development should preserve the settings of Weavers, Felmoor Farmhouse and Pump (all listed at grade II). These requirements should be included in the policy and supporting text of the Plan. (PSLP1906 Historic England)
16. Felsted FEL 3 (Residential Commitments)	
SUPPORT	
OBJECT	
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF	

REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
17. Flich Green FLI 1 (Residential Commitments)	
SUPPORT	
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
18 Great Chesterford	
SUPPORT	
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> We would expect any development coming forward to provide either a Transport Assessment or Statement carried out in accordance with current guidance and best practice, any applicant is strongly recommended to seek guidance before undertaking the work, if a significant impact is identified this will need to be mitigated. (PSLP3034 Highways England) Development through allocations could have potential air and/or water quality impacts on Hildersham Wood SSSI. The allocation is within an area, Chalk and Chilterns, identified by Natural England as a focus for priority habitat creation and enhancement to connect fragmented chalk grassland and woodlands and benefit farmland birds. (PSLP2474 Natural England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Include reference to Transport Assessment or statement in policy for sites in Great Chesterford. (PSLP3034 Highways England)
18. Great Chesterford GtCHE 1 (Land north of Barthlomew Close)	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Currently no mention of heritage assets in policy. This site is adjacent to the Great Chesterford Conservation Area and there are a number of grade II listed buildings to the south. (PSLP1908 Historic England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Development should preserve or enhance the character or appearance of the Great Chesterford Conservation Area and preserve the settings of the nearby listed buildings. These requirements should be included in the policy and supporting text of the Plan. (PSLP1909 Historic England)
18. Great Chesterford GtCHE 2 (Residential Commitments)	
SUPPORT	
OBJECT	

SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
18 Great Chesterford GtCHE 3 (Land adjacent Community Centre)	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Have concerns of the potential impact of development on the setting of the scheduled monuments but note site now has planning permission. Welcome reference to heritage assets but minor amendment to wording needed. (PSLP1909 Historic England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Amend “ancient monument” to “Scheduled Monument “(the current term used in the NPPF). These requirements should be included in the policy and supporting text of the Plan. (PSLP1909 Historic England)
19 Great Dunmow	
SUPPORT	
OBJECT	6
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Policies omit reference and requirement to facilitate the linking of the Flitch Way for all user groups in accordance with the requirements listed in Chapter 7. (PSLP635 Flitch Way Action Group) We would expect any development coming forward to provide either a Transport Assessment or Statement carried out in accordance with current guidance and best practice, any applicant is strongly recommended to seek guidance before undertaking the work, if a significant impact is identified this will need to be mitigated. (PSLP3035 Highways England) Development through allocations could have potential air and/or water quality impacts on Garnetts Wood/Barnston Lays SSSI, High Wood Dunmow SSSI. (PSLP2475 Natural England) A number of the proposed allocated sites do not score as positively against the principles of sustainable development, particularly in comparison to our client’s site at Dunmow Park (09GtDun15); Why have policies in Neighbourhood Plan been replicated but in some cases the site capacity increased? (PSLP2695 Bovis Homes) Each of the developments within the plan together an almost doubling the size of the population of the town, bearing in mind that the planned Easton development will border Dunmow what provision is being made to secure the historic character of the town to justify both the expansion of existing communities and the

	creation of the new Garden communities which does not seem to be justified within the same local area, straining resources, infrastructure and facilities. (PSLP31 C Fantides)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Include reference to Transport Assessment or statement in policy for sites in Great Dunmow. (PSLP3035 Highways England) • Allocate Dunmow Park for residential development of 120 dwellings.(09GtDun15) (PSLP2695 Bovis Homes)
19. Great Dunmow GtDUN 1 (Land west and south west of Great Dunmow)	
SUPPORT	1
OBJECT	10
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • The proposal in criterion (2) is welcomed as this is necessary to ensure the delivery of replacement playing fields for Helena Romanes School (PSLP70 Sport England)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Object to policy – insufficient infrastructure and consideration of impact on quality of life of existing community. As provision of secondary school is no longer being provided as originally offered this site should no longer be considered viable (PSLP202/752 A Farrell) • No reference is made to the Flitch way being accessible to all users including equestrians; and policy omits requirement on developer to facilitate linking of the Flitch Way around Great Dunmow for all users in accordance with the requirements listed in Chapter 7. This link is fully supported by the Highways Authority and forms part of the Rights of Way Improvement Plan and therefore its omission should be rectified. (PSLP407 Essex Bridleway Association) (PSLP630 Flitch Way Action Group) (PSLP804 British Horse Society) • In the event of further delays to Smith's Farm and/or Woodside Way, part of the land for education use may be required for a primary school. (PSLP968 ECC) • Bullet point 1- 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 (old NPPF, paras 55 and 140/para 79b and 202 of the new NPPF). We welcome reference to Flitch Way and appropriate buffers in the policy;to the grade II listed buildings in bullet point 11 (PSLP1913 Historic England) • Local Plan policy concerning the subject site should be consistent with the GDNP, key difference relate to capacity and land the school. Policy should be flexible to enable the land and financial contributions to be used for education purposes rather than specifically for a new secondary school. (PSLP2554 Kier Living) (PSLP2556 Siemens Benefit Scheme)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • A requirement is embedded within each of the Development Policies for the land allocations where this link will run that a S106 agreement is imposed on the developer for a fully-funded multi-user route across all relevant sites, to ensure the Flitch Way is completed without delay. Where connectivity of these sites to the Flitch Way link is an issue, S106 funding should also be sought to enhance this connectivity to ensure the multi-user path is readily accessible to as many users as possible. It also follows that any

	<p>new links with the Flitch Way within any new development adjoining it should be accessible to all users - pedestrians, cyclists and equestrians. (PSLP407 Essex Bridleway Association) (PSLP630 Flitch Way Action Group) (PSLP804 British Horse Society)</p> <ul style="list-style-type: none"> • Delete references to "new secondary school" and replace with "schools provision". (PSLP968 ECC) • Bullet point 1 - delete 'an enabling development'. We recommend the policy is amended appropriately to meet the circumstances of this proposal. Amend bullet point 11 to state, 'Preserve the grade II listed Folly Farm, Highwood Farm and Round house and their settings by ensuring a buffer zone separates this collection of buildings from new development. (PSLP1913 Historic England) • Policy should be adjusted to refer to a "minimum of 400 dwellings" and "The development will provide land and financial contributions for education development purposes" (PSLP2554 Kier Living) (PSLP2556 Siemans Benefit Scheme)
<u>19 Great Dunmow GtDUN 2 (Land at Helena Romanes School)</u>	
SUPPORT	1
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • The requirement in criterion (2) for no loss of sports provision until new playing fields of at least equivalent quantity/quality are available for community use is welcomed. The requirement for the Great Dunmow Leisure Centre to remain operational throughout the development of the site is also welcomed. These requirements should help ensure that the development of the site would accord with Government policy in paragraph 97 of the NPPF (2018) and policy INF2 of the local plan. (PSLP71 Sport England)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • It would be helpful to list the listed buildings (PSLP1916 Historic England) • Policy requirements 2 is unjustified by the evidence and requirements 7,8,9, and 10 are unnecessary as repeating development management processes. (PSLP2791 Helena Romanes School)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • List the listed buildings and amendment wording to preserve the setting of the listed buildings and to preserve or enhance the character or appearance of the conservation area and its setting. (PSLP1916 Historic England) • Delete requirements 2, 7, 8, 9 and 10.
<u>19. Great Dunmow GtDUN 3 (Woodfield, Woodside Way)</u>	
SUPPORT	0
OBJECT	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • The Archaeological Assessment of allocated sites (February 2018) indicated that the site may contain archaeological deposits which will need to be considered by future development proposals, through an archaeological evaluation. (PSLP973 ECC) • Currently no mention of heritage assets in policy. The site lies to the north of Stortford Road which, as a Roman Road, may have archaeological potential. (PSLP1920 Historic England)

Statement of Consultation
Summary of Reg 19 Representations Chapter 12 -34 Site Allocations

	<ul style="list-style-type: none"> Requirement 2 is unnecessary as it duplicates development management processes (PSLP1568 C Trembath)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Add an additional numbered bullet to read: An appropriate Archaeological Assessment will be required Supporting text and policy to identify that as the site lies to the north of Stortford Road, as a Roman Road, may have archaeological potential (PSLP1920 Historic England) Amend point 2 “It provides for open space within the development including informal recreation areas, and the provision of children’s play spaces (LEAPs and NEAPs); The application should be accompanied by a Transport Assessment, flood Risk Assessment, Approved Drainage Strategy and other required document and any recommended improvements/remedial works will be controlled through the legal obligation:” (PSLP1568 C Trembath)
19. Great Dunmow GtDUN 4 (Land south of B1256 (Stortford Road and West of Buttleys Lane)	
SUPPORT	0
OBJECT	5
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> The Archaeological Assessment of allocated sites (February 2018) indicated that the site may contain archaeological deposits which will need to be considered by future development proposals, through an archaeological evaluation. (PSLP973 ECC) Object to policy as contrary to Neighbourhood Plan. (PSLP980 Great Dunmow TC) Welcome reference in bullet point 4 to listed buildings. Suggest minor wording changes. The site lies to the north of Stortford Road which, as a Roman Road, may have archaeological potential (PSLP1922 English Heritage) Object to policy as site not allocated in Neighbourhood Plan, lead to coalescence of Great Dunmow and Easton Park GC; delivery will be more long term as should await development of site to east.(PSLP2694 Bovis Homes) Support principle of policy but object to the scoring of certain aspects of the site’s credentials in the Sustainability Appraisal accompanying the Plan (PSLP2874 Linden Homes)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Add an additional numbered bullet to read: An appropriate Archaeological Assessment will be required (PSLP973 ECC) Delete policy (PSLP980 Great Dunmow TC) Change the word protecting to preserving in line with the legislation. Supporting text and policy to identify that as the site lies to the north of Stortford Road, as a Roman Road, may have archaeological potential. (PSLP1922 English Heritage) The sustainability conclusions in the Sustainability Appraisal should be amended to take account of the proportionate evidence submitted with these representations in the interest of drawing justified conclusions. (PSLP2874 Linden Homes)
19. Great Dunmow GtDUN 5 (Oaklands, Ongar Road)	
SUPPORT	0

OBJECT	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • This development makes no proper provision for safe off road multi user tracks. There is an opportunity to provide a much needed off road link with the adjoining development at Ongar Road South and a safe Pegasus crossing suitable for all non motorised users across Ongar Road to link up with the development on Ongar Road North connecting to the new bridleway which will link up the severed sections of the Flitch Way. Long term if the new secondary school is constructed such a route will be a vital link for students wishing to walk and cycle to school in safety. (PSLP631 Flitch Way Action Group) • The Archaeological Assessment of allocated sites (February 2018) indicated that the site may contain archaeological deposits which will need to be considered by future development proposals, through an archaeological evaluation. (PSLP975 ECC) • Currently no mention of heritage assets in policy. There are three Grade II listed buildings to east of the site and the Clapton Hall moated site and fishpond scheduled monument to the south east of the site. Any development of the site has the potential to impact upon these heritage assets. (PSLP1923 Historic England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Development should include an off road safe multi user track and a Pegasus crossing to facilitate use by walkers, cyclists and equestrians. The developer should be required to enter into a s106 Agreement requiring the developer to contribute to the costs of creating the Flitch Way link route both within and outside the development. (PSLP631 Flitch Way Action Group) • Add an additional numbered bullet to read: An appropriate Archaeological Assessment will be required (PSLP975 ECC) • Policy and supporting text to include reference to preserving the listed buildings and their settings and protect the scheduled monument and its setting.(PSLP1923 Historic England)
<u>19. Great Dunmow GtDUN 6 (14 Stortford Road, Perkins Garage Site)</u>	
SUPPORT	0
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Currently no mention of heritage assets in policy. The site is located in the Great Dunmow Conservation Area and there are a number of grade II listed buildings nearby. This is an opportunity to enhance the conservation area through sensitive, high quality design. (PSLP1926 Historic England) • Policy makes reference that a previous application for the site has expired, and therefore it is unclear whether this site can come forward as expected. (PSLP2693 Bovis Homes)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Policy should include reference to the conservation area, listed buildings and opportunities to enhance the area. (PSLP1926 Historic England)

<u>19. Great Dunmow GtDUN 7 (Land east of St Edmunds Lane)</u>	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Currently no mention of heritage assets in policy. Grade II listed Tower House lies to the north of the site. Notwithstanding some new intervening residential development between the site and the heritage asset the policy should reference the asset (PSLP1929 Historic England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> The policy should reference the preservation of the grade II Tower House and its setting. (PSLP1929 Historic England)
<u>19. Great Dunmow GtDUN 8 (Land west of Chelmsford Road)</u>	
SUPPORT	0
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Policies omit reference and requirement to facilitate the linking of the Flitch Way for all user groups in accordance with the requirements listed in Chapter 7 (PSLP408 Essex Bridleway Association) (PSLP632 Flitch Way Action Group) (PSLP806 British Horse Society) Currently no mention of heritage assets in policy. The grade II listed Crofters and a Barn lie to the west of the site and to the north west lies a grade II listed gatehouse.(PSLP1931 Historic England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> A requirement that Policy for the land allocation where this link will run that a S106 agreement is imposed on the developer for a fully-funded multi-user route across all relevant sites, to ensure the Flitch Way is completed without delay. Where connectivity of these sites to the Flitch Way link is an issue, S106 funding should also be sought to enhance this connectivity to ensure the multi-user path is readily accessible to as many users as possible. It also follows that any new links with the Flitch Way within any new development adjoining it should be accessible to all users - pedestrians, cyclists and equestrians. Policy should require development to preserve the nearby listed buildings and their settings. (PSLP1931 Historic England)
<u>19. Great Dunmow GtDUN 9 (Land west of Woodside Way)</u>	
SUPPORT	0
OBJECT	9
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Object to policy because of lack of infrastructure being provided on site (PSLP204 / PSLP753 A Farrell) Bridleways already in existence in this parcel of land and these should be retained and should form the basis of a wider network of multi-user paths accessible to all users, including equestrians.

	<p>his parcel of land also has the potential to link this bridleway to the Flitch Way if a new route can be established to run east on the south side of the development to enable a direct crossing onto Buttleys Lane, leading to the Flitch Way. (PSLP409 Essex Bridleway Association) (PSLP634 Flitch Way Action Group) (PSLP808 British Horse Society)</p> <ul style="list-style-type: none"> • The Archaeological Assessment of allocated sites (February 2018) indicated that the site may contain archaeological deposits which will need to be considered by future development proposals, through an archaeological evaluation.(PSLP977 ECC) • Currently no mention of heritage assets in policy. There are a number of grade II listed assets to the south and south east of the site including Folly Farmhouse, (and outbuildings, barn and granary) and Highwood House. (PSLP1935 Historic England) • Policy broadly supported but object to requirement 4 as outline planning permission has been granted and this was supported by an Environmental Statement which included a Landscape and Visual Character Assessment. (PSLP2661 Savills) • Allocation directly abuts the boundary of High Wood Dunmow hence potential for direct and indirect impacts must be assessed and mitigated. (PSLP2476 Natural England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Policy is amended to include the enhancement of the network of multi-user routes accessible to all vulnerable road users including equestrians, rather than the default option which tends to only cater for pedestrians and cyclists. (PSLP409 Essex Bridleway Association) (PSLP634 Flitch Way Action Group) (PSLP808 British Horse Society) • Add an additional numbered bullet to read: An appropriate Archaeological Assessment will be required as • Policy should require development to preserve the nearby listed buildings and their settings. (PSLP1935 Historic England) • Policy reworded to require that reserved matters submissions take account of the Landscape and Visual Character Assessment.(PSLP2661 Savills)
<u>19. Great Dunmow GtDUN 10 (Residential Commitments)</u>	
SUPPORT	0
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Uttlesford is concentrating an unrealistic number of new homes in Great Dunmow. Well over 1000 when the houses planned south of Stortford Road are considered. A small market town. Parking is already an issue. The supermarkets are not sufficient to cope and shopping can be a disappointing ordeal. (PSLP19 C Woodhead) • Policy omits reference to S106 funding for Flitch Way link route as part of development of sites north and south of Ongar Road. (PSLP410 Essex Bridleway Association) (PSLP633 Flitch Way Action Group) (PSLP810 British Horse Society)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Stop the continued development once Woodside is completed. Leave the area to the South of Stortford Road for another

	<p>generation at least. (PSLP19 C Woodhead)</p> <ul style="list-style-type: none"> • Policy is amended to include the requirement to provide the sections of the Flitch Way route, and the enhancement of the connectivity between developments north and south of Ongar Road accessible to all vulnerable road users including equestrians, together with the provision of a multi-user crossing on the B184. (PSLP410 Essex Bridleway Association) (PSLP633 Flitch Way Action Group) (PSLP810 British Horse Society)
19. Great Dunmow GtDUN 11 (Development Opportunity Sites)	
SUPPORT	1
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • We welcome the reference in the policy to the Conservation Area and Listed Buildings. (PSLP1937 Historic England)
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
20. Great Easton GtEAS 1 (Land of Brocks Mead)	
SUPPORT	0
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Object to policy as site has no access, greenfield site with significant slope, contribute to flooding, increase in traffic, lack of and distance from services and facilities, remainder of field made unusable apart from further housing.. (PSLP174 P Hurrell) • The site is located in close proximity to a Scheduled Site, and will require consultation with Historic England regarding the impact on the setting of the listed building and monument. The Archaeological Assessment of allocated sites (February 2018) indicated that the site may contain archaeological deposits which will need to be considered by future development proposals, through an archaeological evaluation. (PSLP964 ECC) • We welcome the reference in the policy to the conservation area, church, listed buildings and scheduled monument. (PSLP1938 Historic England) • The allocation boundary unnecessarily constrains the development potential and sustainability of the site.(PSLP1556 C Trembath)
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Delete policy (PSLP174 P Hurrell) • Add an additional numbered bullet to read: An appropriate Archaeological Assessment will be required • The policy should also state that the development should conserve and enhance heritage assets and their settings.(PSLP1938 Historic England) • Amend policy to refer to quantum of development of 26 dwellings, an area of 1.4 hectares; replace requirement 4 with “A landscape buffer should be incorporated along the eastern edge of the development, incorporating a pedestrian link to Great Easton Footpath 19 which connects to the village centre.” Delete

	requirement 5. (PSLP1556 C Trembath)
21. High Roding HROD 1 (Residential Commitments)	
SUPPORT	
OBJECT	
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
22. Little Canfield LtCAN 1 (Land to the south of B1256 Little Canfield)	
SUPPORT	0
OBJECT	14
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> We would expect any development coming forward to provide either a Transport Assessment or Statement carried out in accordance with current guidance and best practice, any applicant is strongly recommended to seek guidance before undertaking the work, if a significant impact is identified this will need to be mitigated. (PSLP3037 Highways England) Object to policy as planning permission has been refused; location of the site is not suitable. (PSLP988 Great Dunmow TC) (individuals) Object to policy limiting the employment uses that can take place on the site. (PSLP1557 C Trembath) We welcome reference in the policy to listed buildings and Fritch Way. However the policy should also state that development should preserve the listed buildings and their settings. Where is the map for this site? (PSLP1939)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Include reference to Transport Assessment or statement in policy(PSLP3037 Highways England) Delete policy (PSLP988 Great Dunmow TC) (individuals) Amend policy with additional text to include <u>General Industrial and Storage and Distribution</u> uses (Use classes B1, B2 and B8); delete Criteria 2 and 3. (PSLP1557 C Trembath) Policy should also state that development should preserve the listed buildings and their settings.(PSLP1939 Historic England) Delete policy and replace with policy allocating 'Land East of B1256, Great Dunmow' as proposed 8.6 ha employment site. (PSLP2548 Wolfe)
23. Little Chesterford LtCHE 1 (Chesterford Research Park)	
SUPPORT	2
OBJECT	8
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Policy is supported (PSLP976 Grosvenor) (PSLP2034 Aviva)
SUMMARY OF	<ul style="list-style-type: none"> Object to policy as development is unnecessary, cannot be

REPRESENTATIONS IN OBJECTION	<p>sustained, burden on surrounding infrastructure, detrimental impact of additional traffic, greenfield development. The District Council has a conflict of interest (PSLP2342 Little Chesterford PC) (individuals)</p> <ul style="list-style-type: none"> • There is a scheduled monument, a moated site in Paddock Wood, to the north of the site. Development will need to protect the scheduled monument and its setting. Where is the map for this site? (PSLP1942 Historic England) • National Grid prefers that buildings are not built directly beneath its overhead lines. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. (PSLP2400 National Grid) • Any development coming forward to provide either a Transport Assessment or Statement carried out in accordance with current guidance and best practice, any applicant is strongly recommended to seek guidance before undertaking the work, if a significant impact is identified this will need to be mitigated.(PSLP3038 Highways England) • Development must be kept as far as possible from ancient woodland, with a buffer area maintained between the ancient woodland and any development boundary. (PSLP816 Woodland Trust)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Policy to refer to protection of scheduled monument and its setting. (PSLP1942 Historic England) • Include reference to Transport Assessment or statement in policy(PSLP3038 Highways England) • Deletion of the site allocation or inclusion of an appropriate area of buffering (PSLP816 Woodland Trust)
24. Little Dunmow LtDUN 1 (Residential Commitments)	
SUPPORT	
OBJECT	
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
25. Little Hallingbury LtHAL 1 (Residential Commitments)	
SUPPORT	1
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Development at the scale proposed is unlikely to have a sever affect upon the Strategic Road Network (PSLP3040 Highways England)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Object to land north of Rose Cottage, Latchmore Bank, Little Hallingbury not being included within the village boundary. (PSLP2927 D Howard)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Include site within development limits.
26 Newport	
SUPPORT	1
OBJECT	4

SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Development at the scale proposed is unlikely to have a sever affect upon the Strategic Road Network(PSLP3041 Highways England)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Object to omission of land to the south of Wicken Road, Newport (04New15)(PSLP2786 Countryside Properties) Object to omission of land west of School Lane (05New15) Object to omission of Land east of Newport, south of Debden Road (NEW) (PSLP2884 Taylor Wimpey) Object to omission of land at Bury Water Lane Newport (07New15) (PSLP1593 Sir Arthur Ellis Trust) Development through allocations could have potential air and/or water quality impacts on Quendon Wood SSSI, Debden Water SSSI. (PSLP2477 Natural England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Allocate 10.11 ha of land south of Wicken road for 150 dwellings (04New15) (PSLP2786 Countryside Properties) Allocate land west of School Lane for 90 dwellings (15New15) (PSLP679 D Hill) Allocated 8 ha of land east of Newport, south of Debden Road for 200 dwellings (NEW) (PSLP2884 Taylor Wimpey) Allocate land at Bury Water Lane for residential development (07New15) (PSLP1593 Sir Arthur Ellis Trust)
26. Newport NEWP1 (Land west of London Road)	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Welcome reference to the Conservation Area. The policy should also mention the nearby grade II listed buildings, Rose Cottage and Granta (PSLP1949 Historic England).
MODIFICATION REQUEST	<ul style="list-style-type: none"> Policy to state that development should preserve or enhance the character or appearance of the conservation area and its setting and preserve the listed buildings and their settings.(PSLP1949 Historic England)
26. Newport NEWP2 (Land at Bricketts, London Road)	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Support allocation of site but object to omission of land to the south (03New15)(PSLP2434 M Flood)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Policy NEWP 2 is amended to reflect a quantum of development of approximately 24 dwellings, and a site area of 1 hectare. (03New15)(PSLP2434 M Flood)
26. Newport NEWP3 (Land at Holmewood, Whiteditch Lane)	
SUPPORT	0
OBJECT	2
SUMMARY OF REPRESENTATIONS IN	

SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> The Archaeological Assessment of allocated sites (February 2018) indicated that the site may contain archaeological deposits which will need to be considered by future development proposals, through an archaeological evaluation. (PSLP979 ECC) Currently no mention of heritage assets in policy. Shortgrove Hall RPG (grade II) lies to the west of the site.(PSLP1951 Historic England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Add an additional numbered bullet to read: "An appropriate Archaeological Assessment will be required (PSLP979 ECC) The policy should state that, 'Development should protect the Shortgrove Hall Registered Park and Garden (grade II) and its setting.' (PSLP1951 Historic England)
26. Newport NEWP4 (Land at Bury Water Lane)	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATION IN OBJECTION	<ul style="list-style-type: none"> Currently no mention of heritage assets in policy. 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. (PSLP 1952 Historic England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> The policy should state that Development should conserve and where appropriate enhance heritage assets and their settings including the grade I listed Church of St Mary and the Newport Conservation Area. (PSLP1952 Historic England)
26. Newport Policy 1 Residential Commitments.	
SUPPORT	
OBJECT	
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
26. Newport NEWP5 (Land at adjacent to Newport Primary School)	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Currently no mention of heritage assets in policy. The Newport Conservation Area, that includes a number of listed buildings, lies to the south of the site.(PSLP1953 Historic England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> The policy should state that Development should conserve and where appropriate enhance heritage assets and their settings including the listed buildings and the Newport Conservation Area. .(PSLP1953 Historic England)

27. Quendon and Rickling	
SUPPORT	1
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Development at the scale proposed is unlikely to have a sever affect upon the Strategic road network (PSLP3042 Highways England) Development through allocations could have potential air and/or water quality impacts on Quendon Wood SSSI, Debden Water SSSI. (PSLP2478 Natural England)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Not enough consideration is given to the local infrastructure and local amenities.(PSLP J McSweeney)
MODIFICATION REQUEST	
27. Quendon and Rickling QUE 1 (Land East of Foxley House)	
SUPPORT	1
OBJECT	6
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Object to policy – density is too high, impact on local infrastructure, nature conservation, visual amenity; and poor highway access (individuals) We welcome the reference to the Conservation Area and listed buildings in the policy. Minor amendment to wording suggested (PSLP1954 Historic England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Policy should include a bullet point to read, 'Development should conserve and where appropriate enhance heritage assets and their settings including the listed buildings and Quendon and Rickling Conservation Area. (PSLP1954 Historic England)
27. Quendon and Rickling QUE 2 Residential Commitments	
SUPPORT	0
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Object to policy - highway safety and local infrastructure. (individuals)
MODIFICATION REQUEST	
28. Radwinter	
SUPPORT	
OBJECT	
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
29 Saffron Walden	
SUPPORT	1

OBJECT	5
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Development at the scale proposed is unlikely to have a sever affect upon the Strategic Road Network (PSLP2044 Highways England)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> There is inconsistency in the conditions attached to the proposed development sites, with some referencing the AQMA and some not. All sites in Saffron Walden have an impact on the AQMA. (PSLP2374 Saffron Walden TC) (PSLP2972 Saffron Walden and Little Walden Neighbourhood Plan Group) Concerned about future development of the former Friends School (Walden School) site and the potential loss of the woodland tranche adjacent to the playing fields impact wildlife, flooding and loss of open space. (PSLP1757 B Tournier) There is a need for more infrastructure If housing is added in Saffron Walden area (as it definitely needs to be) It is imperative that additional means are provided to allow traffic to get around from West to East and to get to supermarkets, industry (jobs) and hospital etc. as there is no alternative route and existing roads are not coping at peak times. (PSLP2321 I Norman) Development through allocations could have potential air and/or water quality impacts on Nunn Wood SSSI, Hales & Shadwell Woods SSSI, Ashden Meadows SSSI and Debden Water SSSI.(PSLP2479 Natural England) Object to omission of 25.7 ha land at Shire Hill Farm for 450 homes. (11Saf15)(PSLP2666 Landowners) Object to allocation of Pulse Packaging Radwinter Road as an employment site. (20Saf17) (PSLP3058 The Joint Administrators of Pulse Packaging)
MODIFICATION REQUEST	<ul style="list-style-type: none"> All policies must have as a planning condition that an Air Quality Assessment will be required to demonstrate that the development would not have an impact on the Saffron Walden AQMA. (PSLP2374 Saffron Walden TC) (PSLP2972 Saffron Walden and Little Walden Neighbourhood Plan Group) Policy on relief road or simple bypass around Saffron Walden. (PSLP2321 I Norman) Allocate 25.7 ha land at Shire Hill Farm for 450 homes.(11Saf15) (PSLP2666 Landowners). The Saffron Walden Inset Map should be amended to remove the employment allocation from the site. The site should be included within the list of sites, within Chapter 29 (20Saf17) (PSLP3058 The Joint Administrators of Pulse Packaging)
29. Saffron Walden SAF 1 (Land North of Thaxted Road)	
SUPPORT	0
OBJECT	11
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF	<ul style="list-style-type: none"> The 5% dwellings for older people does not take into account the

<p>REPRESENTATIONS IN OBJECTION</p>	<p>growing need for older persons housing. The amount of homes for older persons must not be reduced. There are no provisions or review of surface water runoff. (PSLP732 D Morris)</p> <ul style="list-style-type: none"> • Object to policy on grounds previously dismissed on appeal, of traffic congestion, air pollution, loss of arable land, lack of justification to build homes young people cannot afford. (individuals) (PSLP2272 Residents for Uttlesford) (PSLP2600 Residents for Uttlesford) • Site has previously dismissed on appeal on grounds including traffic congestion. ECC has made it clear that 150 homes is the upper limit for further development in the east of the town. Since that point 85 homes and 42 units in a retirement village have been granted planning permission. This leaves a net of 23 homes. (PSLP2373 Saffron Walden TC) (PSLP2971 Saffron Walden and Little Walden Neighbourhood Plan Group) • The Archaeological Assessment of allocated sites (February 2018) indicated that the site may contain archaeological deposits which will need to be considered by future development proposals, through an archaeological evaluation. (PSLP981 ECC) • Support policy. Minor wording amendments suggested (PSLP2841 Kier Living)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Need for a traffic assessment and air quality assessment covering all of the principle junctions in Saffron Walden before any new development can be assessed as being sustainable or not. (PSLP2373 Saffron Walden TC) (PSLP2971 Saffron Walden and Little Walden Neighbourhood Plan Group) • Add an additional numbered bullet to read: An appropriate Archaeological Assessment will be required (PSLP981 ECC) • Delete policy • Amend policy title to 'Land <u>east</u> of Thaxted Road'. Paragraph 4 be amended to read "An Air Quality Assessment will be required to demonstrate the development will have no significant impact on the Saffron Walden AQMA. The Air Quality Assessment will also need to demonstrate that if there is a potential significant impact on the AQMA, suitable mitigation measures are put in place" Paragraph 6 should be rewritten to read "appropriate ecological surveys will be required". paragraph 11 of the policy be rewritten to read "<i>the masterplan needs to make provision for a road that would be capable of delivering the southern section of the link road that would run from Thaxted Road to Radwinter Road</i>". Amend Site Description to read "..... <i>the site is bounded by residential development to the north and south and a leisure centre to the west</i>". Constraints section amended to read "Constraints : Impact on the Saffron Walden AQMA – An Air Quality Assessment will be required to accompany any application to demonstrate the development of this side will have no significant impact on the Saffron Walden AQMA. Guidance provided by the Institute of Air Quality Management could be used for the definition of 'significant'."

	Site Description paragraph be amended to read “The application will be need to be accompanied by a Transport Assessment to demonstrate that the residual impact of the development upon the highway network is not severe”
29. Saffron Walden SAF 2 (Land East of Little Walden Road)	
SUPPORT	
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Currently no mention of heritage assets in policy. Cinder Hall grade II listed building lies to the north of the site. Development should preserve the Cinder Hall (grade II listed) and its setting.
MODIFICATION REQUEST	<ul style="list-style-type: none"> Additional bullet point in the policy preserving the Cinder Hall (grade II listed) and its setting (PSLP1956 Historic England)
29. Saffron Walden SAF 3 (Land North at Viceroy Coaches to rear of 10-12 Bridge Street)	
SUPPORT	0
OBJECT	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> The Archaeological Assessment of allocated sites (February 2018) indicated that the site may contain archaeological deposits which will need to be considered by future development proposals, through an archaeological evaluation.(PSLP982 ECC) We welcome the reference to the Conservation Area and listed buildings in the policy. Ideally the policy should include additional bullet point. (PSLP1957 Historic England) Reference should be made to listed building on site. (PSLP2274 We Are Residents.org)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Add an additional numbered bullet to read: “An appropriate Archaeological Assessment will be required. (PSLP982 ECC) Include a bullet point to read, 'Development should conserve and where appropriate enhance heritage assets and their settings including the listed building on site (12 Bridge Street), numerous listed buildings nearby and Saffron Walden Conservation Area. (PSLP1957 Historic England) Add the following text “The Grade 2 listed building on this site will be protected.” (PSLP2274 We Are Residents.org)
29. Saffron Walden SAF 4 (Jossaumes, Thaxted Road)	
SUPPORT	0
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> We welcome the reference to the listed buildings in the policy. The Saffron Walden Conservation Area lies to the north of the site. Ideally the policy should include additional bullet. (PSLP1958 Historic England) Reference should be made to retention of gas works building.

	(PSLP2275 WeAreResidents.org)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Include a bullet point to read, 'Development should conserve and where appropriate enhance heritage assets and their settings including the listed buildings on site (12 Bridge Street), numerous listed buildings nearby and Saffron Walden Conservation Area. (PSLP1958 Historic England). • Add the following "The main gasworks building should be retained and built in to the development." (PSLP2275 We Are Residents.org)
29. Saffron Walden SAF 5 (Land at De Vigier Avenue)	
SUPPORT	1
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Policy supported (PSLP813 Carter Jonas)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Site is unsustainable location on a site which currently provides significant natural benefits in an area largely devoid of them.(PSLP2273 WeAreResidents.org)
MODIFICATION REQUEST	
29. Saffron Walden SAF 6 (Land south of Tiptofts, Thaxted Road)	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
29. Saffron Walden SAF 7 (Land West of Lime Avenue)	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Currently no mention of heritage assets in policy. There are a number of designated heritage assets in close proximity to the site. These include the Saffron Walden Conservation Area located to the south of the site with the Grade II* listed Bridge End Registered Park and Garden to the south west of the site. There are also a number of Grade II listed buildings to the south. (PSLP1959 Historic England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • The policy should include a bullet point to read, 'Development should conserve and where appropriate enhance heritage assets and their settings including the Saffron Walden Conservation Area, Bridge End Gardens (RPG, grade II) and several grade II listed buildings to the south of the site. (PSLP1959 Historic England)
29. Saffron Walden SAF 8 (Land south of Radwinter Road)	
SUPPORT	0
OBJECT	1
SUMMARY OF	

REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Although supporting the policy in principle there are concerns in respect of the specific wording of the draft allocation which does not currently provide sufficient flexibility to enable sustainable development can be delivered on site. (PSLP2660 Manor Oak Homes)
MODIFICATION REQUEST	<ul style="list-style-type: none"> The opening paragraph of the policy should read: “Land South of Radwinter Road, Saffron Walden is shown on the Policies Map, is allocated for development at a <u>minimum</u> of 200 dwellings, <u>and 42</u> extra care dwellings, 0.5ha for employment (B1 offices) <u>or a minimum 40 dwellings on the extra care and employment sites,..”</u> (PSLP2660 Manor Oak Homes)
29. Saffron Walden SAF 9 (Land rear of The Kilns, Thaxted Road)	
SUPPORT	0
OBJECT	9
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
29. Saffron Walden SAF 10 (Residential Commitments)	
SUPPORT	
OBJECT	
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
29. Saffron Walden SAF 11 (Land north of Ashdon Road)	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> The marketing of the site is on-gong but it has already been established that there is no reasonable prospect of all of the remaining undeveloped commercial land at Ashdon Road being brought forward for commercial use. With the Ridgeons plot already having being delivered (phase 1a), it is considered correct to retain this parcel of land and the plot of the employment land which sits in front of the Ridgeons store (phase 1d) for employment use. On the basis that market demand simply does not exist for the consented commercial phases of development located further into the site (phases 3 and 5), it is proposed that these land parcels be released for housing. (PSLP814 Carter Jonas)

MODIFICATION REQUEST	<ul style="list-style-type: none"> Amend the Policies Map for Saffron Walden to identify only Phases 1a and 1d, as being an “Existing Employment site” <p>Policy SAF 11 should also be amended to provide policy protection for the following commercial uses:</p> <ul style="list-style-type: none"> 1.8ha of land for use as Builder’s Merchant providing 5,939m2 of floor space – Phase 1a 0.76ha of land providing 3,650m2 of B1 or B2 floor space – Phase 1d (PSLP814 Carter Jonas)
29. Saffron Walden SAF 12 (Land south of Ashdon Road)	
SUPPORT	
OBJECT	
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
29. Saffron Walden SAF 13 (Land at Thaxted Road)	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Allocation should be expanded to allow for other Main Town Centre Uses, which would include the provision of additional hotel accommodation. (PSLP2662 Granite Property)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Amend policy to read: "The Council will support the development of land at Thaxted Road, Saffron Walden, as shown on the Policies map, for mixed uses which could include retail, retail warehousing, leisure uses <u>and other main town centre uses, subject to compliance with the NPPF sequential and impact tests where necessary.</u>" Delete remainder of the policy (PSLP2662 Granite Property)
29. Saffron Walden SAF 14 (Development Opportunity Sites)	
SUPPORT	1
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> We welcome the reference to the Conservation Area and listed buildings in the policy. (PSLP1961 Historic England)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> The Archaeological Assessment of allocated sites (February 2018) indicated that the site may contain archaeological deposits which will need to be considered by future development proposals, through an archaeological evaluation. (PSLP984 ECC) Reference should be made to maintaining the ground floors for retail and commercial use. (PSLP2272 WeAreResidents.org)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Add the following wording to the second paragraph below the numbered (1-3): An appropriate Archaeological Assessment will be required. (PSLP984 ECC) Add the following “The ground floors of development on this site

	should be maintained for retail and commercial use.” (PSLP2272 WeAreResidents.org)
29. Saffron Walden SAF 15 (Saffron Walden Community Hospital)	
SUPPORT	0
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATION IN OBJECTION	<ul style="list-style-type: none"> • A new surgery at the hospital site (and opposite Tesco, which has a regular bus service) would be sensible. The two existing surgeries in the town are overcrowded and no longer fit for purpose. They also have inadequate car parking. (PSLP704 Cllr R Freeman) • . Currently no mention of heritage assets in policy. There is a grade II listed building on the site. (PSLP1963 Historic England) • Saffron Walden Community Hospital is set out as a potential site for development. This is despite that fact that the doctors’ surgeries in Saffron are over-subscribed (according to the NHS’s responses given to planning applications), and that the population is growing and could benefit from additional healthcare services, not less. (PSLP2375 Saffron Walden Town Council) (PSLP2968 Saffron Walden and Little Walden Neighbourhood Plan Group)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Reserve site for a health centre(PSLP704 R Freeman) • The policy should include a bullet point to read, Development should preserve the grade II listed Community Hospital building and its setting. (PSLP1963 Historic England) • The site should be protected from development for any use other than healthcare provision unless and until alternative provision in Saffron Walden has been made in the Plan.(PSLP2375 Saffron Walden Town Council)
30. Stansted Airport SA 1 (North Stansted Employment Area)	
SUPPORT	0
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • We would expect any development coming forward to provide either a Transport Assessment or Statement carried out in accordance with current guidance and best practice, any applicant is strongly recommended to seek guidance before undertaking the work, if a significant impact is identified this will need to be mitigated. (PSLP3045 Highways England) • We welcome the reference to listed buildings and archaeology in the policy, although ideally this would be included as a bullet point rather than a constraint. (PSLP1964 Historic England) • Object to restriction of strategic warehousing contrary to Employment Land Review 2017. (PSLP1525 Manchester Airport Group) • Object to policy permitting non--airport related uses on 55 hectares in the North Stansted Employment Area; this site should be retained for airport uses only and alternative sites within the

	vicinity of the airport should be allocated. We believe that this strategy is based on a fundamental misunderstanding of the evidence base. (PSLP943 WRC Morton Trust)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Include reference to Transport Assessment or statement in policy(PSLP3045 Highways England) • Make reference to listed buildings and archaeology a bullet point rather than a constraint. (PSLP1964 Historic England) • Amend policy: - Main Paragraph: the words ‘non-strategic’ should be removed. Point 1: ‘residential and community interests’ should be replaced by ‘residential amenity’. Point 4: This should be deleted, removing the definitive requirement for a masterplan and legal obligation controls. (PSLP1525 Manchester Airport Group) • Policy be amended to release 18 hectares of land. (PSLP943 WRC Morton Trust)
31 Stansted Mountfitchet	
Support	0
Object	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Expect any development coming forward to provide either a Transport Assessment or Statement carried out in accordance with current guidance and best practice, any applicant is strongly recommended to seek guidance before undertaking the work, if a significant impact is identified this will need to be mitigated. (PSLP3046 Highways England) • Object to omission of land to the West of Stansted Mountfitchet being allocated for residential development. (13Sta15) (PSLP1168 City and Country) • Stansted Mountfitchet should be reclassified as a ‘Local Centre’ in view of its size, location, services and facilities and object to omission of land at Pennington Lane for residential development. (07/15Sta15; 24/25Sta16) (PSLP903 Bloor Homes)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Include reference to Transport Assessment or statement in policy(PSLP3046 Highways England) • Allocated additional site of 40 ha west of Stansted Mountfitchet for 800 dwellings. (13Sta15) (PSLP1168 City and Country) • Allocate 25ha of land north of Walpole Farm, West of Cambridge Road and west of Pennington Lane for up to 60 dwellings. (07/15Sta15; 24/25Sta16) (PSLP903 Bloor Homes)
31. Stansted Mountfitchet STA 1 (Land East of Cambridge Road (B1383) and west of High Lane	
SUPPORT	1
OBJECT	2

SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> The allocation during the Plan period is considered reasonable given the recent substantial developments which have added nearly 1,000 dwellings. (PSLP2637 Stansted Mountfitchet PC)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> This proposal would result in considerable deterioration of landscape, especially approaching Stansted Mountfitchet from the North. (PSLP959 K McDonald) The Archaeological Assessment of allocated sites (February 2018) indicated that the site may contain archaeological deposits which will need to be considered by future development proposals, through an archaeological evaluation. (PSLP985 ECC)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Delete policy (PSLP959 K McDonald) Add an additional numbered bullet to read: An appropriate Archaeological Assessment will be required (PSLP985 ECC)
<u>31. Stansted Mountfitchet STA 2 (Land west of 8 Water Lane)</u>	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> The Archaeological Assessment of allocated sites (February 2018) indicated that the site may contain archaeological deposits which will need to be considered by future development proposals, through an archaeological evaluation. (PSLP968 ECC)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Add an additional numbered bullet to read: An appropriate Archaeological Assessment will be required (PSLP968 ECC)
<u>31. Stansted Mountfitchet STA 3 (Development Opportunity Site)</u>	
SUPPORT	
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> The Walpole Farm allocation could have potential air and/or water impacts on Thorley Flood Pound SSSI, Little Hallingbury Marsh SSSI, Elsenham Woods SSSI and Quendon Wood SSSI. The Elms Farm allocation may also affect the above SSSIs, and also Sawbridgeworth Marsh SSSI and Hatfield Forest SSSI & NNR. This area is located within the Lea and Stort Valleys, a priority area for measures to connect fragmented wildlife sites, improve management of priority habitats and species while using the natural assets of the river valleys and wider landscape to help enhance the lives of local people through improved greenspace. (PSLP2480 Natural England)
MODIFICATION REQUEST	
<u>31. Stansted Mountfitchet STA 4 (Land at Alsa Street)</u>	
SUPPORT	0
OBJECT	1
SUMMARY OF	

REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Currently no mention of heritage assets in policy. To the east lie some grade II listed barns and Als Lodge. (PSLP1965 Historic England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> The policy should refer to the listed barns and state, Development should preserve the grade II listed barns at Als Lodge and their setting. (PSLP1965 Historic England)
31. Stansted Mountfitchet STA 5 (Development Opportunity Site)	
SUPPORT	0
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> We welcome the reference to listed buildings and the Conservation Area in the policy, although ideally this would be included as a bullet point rather than a constraint. (PSLP1967 Historic England) For shops and services operating on Lower Street, Chapel Hill and Cambridge Road, improving car parking is a priority. Local businesses and employees are in competition with commuters and airport parkers for limited parking. UDC has already recognised that Stansted Mountfitchet faces the most acute parking issues in the District. Lower Street car park needs to be reorganised, a second deck added if possible and consideration given to re-siting the skate-park (subject to a suitable location being identified and funding allocated). Crafton Green car park and adjacent community facilities need to be analysed to make best use of this valuable site. Analysis on the feasibility of building a multi-purpose hall, a second deck and the acquisition of land behind 14 Cambridge Road for additional parking need urgent attention. (PSLP2638 Stansted Mountfitchet PC)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Make reference to listed buildings and conservation area in bullet point rather than constraint. (PSLP1967 Historic England)
31. Stansted Mountfitchet STA 6 Land adjacent to Forest Hall School	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> We welcome the reference to listed buildings in the policy, although ideally this would be included as a bullet point rather than a constraint. (PSLP1969 Historic England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Make reference to listed buildings as a bullet point rather than a constraint. (PSLP1969 Historic England)
32 Stebbing	
SUPPORT	
OBJECT	1
SUMMARY OF	

REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Object to omission of land west of High Street – Plot A south of Downs Villas and Plot B south of Falcons (07 & 08Sta16) (PSLP1598 Newfields Agricultural Holdings Ltd)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Allocate land west of High Street – Plot A south of Downs Villas and Plot B south of Falcons (07 & 08Sta16) (PSLP1598 Newfields Agricultural Holdings Ltd)

32. Stebbing STE 1 (Land east of Parkside and rear of Garden Fields)	
SUPPORT	
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Development at the scale proposed is unlikely to have a severe affect upon the Strategic Road Network (PSLP3047 Highways England)
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
33 Takeley / Little Canfield	
SUPPORT	0
OBJECT	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> We would expect any development coming forward to provide either a Transport Assessment or Statement carried out in accordance with current guidance and best practice, any applicant is strongly recommended to seek guidance before undertaking the work, if a significant impact is identified this will need to be mitigated. (PSLP3048 Highways England) Takeley is a sustainable settlement and object to low apportionment of growth to Takeley. Object to omission of land at Parsonage Road for development (12Tak15) (PSLP2823 Endurance Estates) Object to omission of 4.42 ha south of Takeley (SLAA reference 06GtCan17). (PSLP2917 Village Developments Takeley) Omission: Land north of Takeley Street is a suitable location for an Employment Area.(13Tak15) (PSLP2741 Pigeon Investment)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Include reference to Transport Assessment or statement in policy (PSLP3048 Highways England) Allocate land at Parsonage Road for development PSLP2823 (12Tak15)Endurance Estates) Allocate land SLAA reference 06GtCan17 (PSLP2917 Village Developments Takeley) Land north of Takeley Street be allocated as proposed Employment Area. (13Tak15) (PSLP2741 Pigeon Investment)
33. Takeley / Little Canfield TAK 1 (Land Between 1 Coppice Close and Hillcroft, South of	

B1256, Takeley Street)	
SUPPORT	0
OBJECT	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • The Archaeological Assessment of allocated sites (February 2018) indicated that the site may contain archaeological deposits which will need to be considered by future development proposals, through an archaeological evaluation. (PSLP987 ECC) • This is a sensitive site to development and careful consideration needs to be given to the setting of the nearby listed buildings but also to the relationship of the currently open space which links the Deer Park with Takeley Street.. (PSLP1970 Historic England) • Policy does not recognise that site falls within Hatfield Forest Zone of Influence. (PSLP2493 National Trust) • Development through allocations could have potential impacts on Elsenham Wood SSSI and Hatfield Forest SSSI & NNR. • Development through the allocations should make a positive contribution to the Essex Living Landscape initiative, through an appropriate requirement in Policy EN7 as discussed above.(PSLP2481 Natural England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Add an additional numbered bullet to read: An appropriate Archaeological Assessment will be required (PSLP987 ECC) • Recommend that a a brief Heritage Impact Assessment is undertaken in relation to this site allocation before it is carried through as an allocated site. As an absolute minimum, reference should be made in the policy to the need to preserve the listed buildings and their settings. (PSLP1970 Historic England) • Policy should require applications for new residential development within the Hatfield Forest Zone of Influence to be supported by a SSSI Impact Assessment. Development which alone, or cumulatively is likely to have an adverse impact upon Hatfield Forest should provide appropriate mitigation. Mitigation may include providing or contributing to measures on or off-site. Financial contributions could be sought through a tariff and secured through a S106 Agreement. (PSLP2493 National Trust)
33. Takeley / Little Canfield TAK 2 (Residential Commitments)	
SUPPORT	
OBJECT	
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
33. Takeley / Little Canfield TAK 3 (Takeley Mobile Home Park)	
SUPPORT	

OBJECT	
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
<u>34 Thaxted</u>	
SUPPORT	1
OBJECT	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Development at the scale proposed is unlikely to have a sever affect upon the Strategic Road Network (PSLP3049 Highways England)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Research conducted by the Thaxted Society shows the traffic problem in Thaxted. (PSLP 624 Thaxted Society) Object to omission of 9 ha land south of Sampford Road, Thaxted for 104 dwellings). (04Thax15) (PSLP2790 Countryside Properties) Object to omission of land at Wedow Road (Phase II) (09Thax15) PSLP2879 Linden Homes)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Allocated land east of Park Street in Thaxted for up to 80 dwellings (15Tha15) (PSLP822 Stonebond Properties) Allocated land south of Sampford Road Thaxted for 104 dwellings (04Tha15) (PSLP2790 Countryside Properties) Allocate Land at Wedow Road (Phase II) Thaxted. (09Tha15) (PSLP2879 Linden Homes)
<u>34. Thaxted THA 1 (Land at Claypits Farm, Bardfield Road)</u>	
SUPPORT	0
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> We welcome the reference to listed buildings in the policy although ideally this would be included as a bullet point rather than a constraint. (PSLP1971 Historic England) Whilst this site is identified in the Emerging Neighbourhood Plans there are concerns over Access which must be addressed prior to any application being considered. We are concerned that the access is within the Conservation Area and a significant new junction will alter its character. We are also concerned that it is immediately opposite the school, giving rise to issues of safety. Further, there will be a significant impact on the setting of Claypitts Farmhouse, a listed building. (PSLP2411 Thaxted PC)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Make reference to 'Development should preserve the listed buildings and their settings' as a bullet point rather than constraint. (PSLP1971 Historic England) In accordance to the Emerging Neighbourhood plan Policy TX HD5 quantum should be reduced to 15. (PSLP2411 Thaxted PC)
<u>34. Thaxted THA 2 (Residential Commitments)</u>	
SUPPORT	
OBJECT	

SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
34. Thaxted THA 3 (Land east of The Mead, Thaxted)	
SUPPORT	0
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • The site holds significant environmental interests and has the potential to host an ecological significance to species such as newts, bats and rare orchids. Clarity is needed as to why this site is allocated (PSLP2412 Thaxted PC) • Object to allocation of site for potential education or other community uses. Site is landlocked. Site not large enough for primary school. (PSLP2772 Countryside Properties)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Delete Policy (PSLP2412 Thaxted PC) • Land to the south of Sampford Road, Thaxted, should be allocated for residential development and include land for a new 2FE Primary School. Policy THA3 should be deleted from the plan, or form part of an allocation for residential development at Land south of Sampford Road. (PSLP2772 Countryside Properties)

Uttlesford District Council Regulation 19 Pre-submission Local Plan; Summary of Responses	
Section / Paragraph / Policy	Summary of Responses
36. Delivery and Monitoring	
SUPPORT	0
OBJECT	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • The proposed mechanisms for monitoring the delivery of the plan are inadequate to ensure success. In relation to the new garden communities they fail to adhere to the Garden City Principles, particularly 1-3. They are also unproven and UDC does not seem to have taken on board methods that have been used in other districts where new communities have been established. This significantly increases the risk that the plan will fail. (PSLP700 Richard Gilyead) • Point 36.25 states ‘the process of implementing the local plan must ensure that the needs of present communities continue to be met without placing an unacceptable burden on existing infrastructure’. This is clearly not going to be achieved and no wishful thinking on the Council’s behalf will make it any more likely. (PSLP1831 Mrs B Marchant-Williams) • Some of the monitoring proposals are poor and the thresholds are inadequate when looked at in relation to green space, sports provision or affordable housing. It is difficult to assess the monitoring required in the absence of a district wide infrastructure plan. There is no delivery at all proposed of any community facilities; there is nothing at all on sustainable transport; disagree with the focus of provision of 4 bedroom homes rather than smaller ones and should be reversed; there is nothing at all on schools, health facilities or other community facilities. (PSLP2238 We Are Residents)
MODIFICATION REQUEST	
Policy M1: Delivery and Review	
SUPPORT	2
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Braintree District Council continues to support the reference in criteria 9 to compulsory purchase orders which could be used if necessary. (PSLP 2066 Braintree DC) • Support Policy M1 and Appendix 2 which will aid the effective implementation and delivery of the housing requirement set out in policy SP3. Support the monitoring of housing delivery against the Housing Trajectory. (PSLP974 Grosvenor)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Policy M1 as it is not compliant with the guidance set out in the Framework and Planning Practice Guidance with regards to the spreading the backlog over the remainder of the plan period. It is also not sufficiently positive when it comes to potential contingencies should the plan be failing. (PSLP970 Gladman)
MODIFICATION REQUEST	
Policy M2: Implementation and Monitoring of Strategic Projects	
SUPPORT	1

OBJECT	6
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> 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. (PSLP2018 Andrewsfield New Settlement Consortium)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> The delivery of the West of Braintree Garden community may be on a different model to that on other major projects within UDC. We note and support that criteria 5 has been changed to enable direct intervention in the delivery of a site in order to support the timely delivery of sites as suggested in our previous comments. (PSLP2067 Braintree DC) The inclusion of proposed arrangements for marketing development with applications is unnecessary and is not a reasonable planning requirement. (PSLP970 Grosvenor) There is a mismatch between Paragraph 3 of Policy M2 and the last sentence of paragraph 36.19 (PSLP983 (K McDonald) In the event that Easton Park and North Uttlesford GCs do not deliver new homes as projected in the trajectory, the measures proposed in Policy M2 will not be sufficient to ensure that Uttlesford is able to meet its market and affordable housing needs. (PSLP2752 Crown Estates; PSLP2270 Countryside Properties) Policy is not effective or positive in addressing any shortfalls identified in housing delivery in the most expedient manner. (PSLP2800 Gladman)
MODIFICATION REQUEST	<ul style="list-style-type: none"> a bespoke policy for WoBGC which, as it applies across two local authority areas, could be set out in detail within the site specific DPD. A minor amendment may be necessary to the policy to make this clarification. (PSLP2067 Braintree DC) Amend policy to include the timetable and proposed arrangements for marketing development and infrastructure delivery. (PSLP970 Grosvenor) Change penultimate line of para 36.19 from "below 25% of" to "to more than 25% below (PSLP983 (K McDonald) Additional sites should be identified to provide some flexibility should the timetables for the new settlements slip. Policy M2 should be amended to include a commitment to an early Local Plan review should it become apparent that the new settlements will not deliver new homes in accordance with the Local Plan trajectory. (PSLP2752 Crown Estates; PSLP2270 Countryside Properties) Policy 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. (PSLP2800 Gladman)
37. Glossary	
SUPPORT	0

OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Policy INF 1 states that Exemplar types of infrastructure are provided in the glossary and appended to this Plan but no definition of infrastructure is included in the glossary. (Essex County Council PSLP990)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Please include the term “significance” (Historic England; PSLP1973)
38. Appendix 1: Replacement Policies	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
39. Appendix 2: Monitoring Framework	
SUPPORT	1
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> The strategies are appropriate, and consistent with national policy as embodied in the NPPF. The garden communities and in particular the West of Braintree will provide the opportunity to meet the objectives (PSLP786 Galliard Homes)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Object to the percentages allocated to 1 and 2 bed, 3 bed and 4+ bed dwellings as it is not possible to state the appropriate percentages across the whole District (PSLP343 Elsenham PC). Monitoring of provision of accessible homes and housing for older people is required (PSLP343 Elsenham PC) Objective 3a is inappropriately worded (PSLP993 K McDonald) Some of the monitoring proposals are poor and the thresholds are inadequate when looked at in relation to green space, sports provision or affordable housing. It is difficult to assess the monitoring required in the absence of a district wide infrastructure plan. There is no delivery at all proposed of any community facilities; there is nothing at all on sustainable transport; disagree with the focus of provision of 4 bedroom homes rather than smaller ones and should be reversed; there is nothing at all on schools, health facilities or other community facilities. (PSLP3051 We Are Residents) Policy H6 is at odds with the Monitoring Framework Appendix 2 target for affordable housing. Policy H6 requires 40% affordable housing, which with an annual housing requirement of 640 new homes equates to 256 affordable homes per annum. The target for objective 1a is only 150 affordable homes per annum, and therefore should be amended to 256. (PSLP2242 We Are Residents)

MODIFICATION REQUEST	<ul style="list-style-type: none"> • Monitoring of provision of accessible homes and housing for older people is required (PSLP343 Elsenham PC) • In Objective 3a remove redundant 'and' in the first line of text (PSLP386 G Mott) • In objective 3a 5th bullet point replace '..by not allowing development...' with "...by only allowing development' or preferably the wording should be strengthened by rewording on similar lines to the provision concerning MG in the bullet point above and become 'Maintaining and protecting the Countryside Protection Zone by only allowing development in very special circumstances'. (PSLP386 G Mott) • Amend Objective 3a as follows: Line 1 - delete "and". Bullet 4 - line 2 - delete "inappropriate". Bullet 5 - line 2 - change "do not" to "would" (PSLP993 K McDonald) • Policy H6 requires 40% affordable housing, which with an annual housing requirement of 640 new homes equates to 256 affordable homes per annum. The target for objective 1a is only 150 affordable homes per annum, and therefore should be amended to 256. (PSLP2242 We Are Residents)
40. Appendix 3: Housing Trajectory	
SUPPORT	1
OBJECT	7
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Support the changes to appendix 3 in relation to the separation of delivery among the three garden communities for ease of reference. (PSLP2070 Braintree DC)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Object to the stepped housing target and the use of the 'Liverpool' approach to addressing the housing delivery backlog. It artificially reduces the housing target in early years while failing to adequately address past under-supply. (PSLP787 Galliard Homes) (PSLP195 Bloomhall) (PSLP678 / PSLP712 Swords) (PSLP2200 Chase New Homes) • UDC need to demonstrate that the growth projections in the Local Plan are based on current and realistic analysis. The projected figures for new housing are questionable, being 50% higher than neighbouring districts and having one of the biggest proposed expansion rates in the country. It is not clear why UDC are imposing this level of growth.(PSLP1052 Julie Williams) • The Trajectory makes unjustified assumptions about delivery rates at the Garden Community sites during later parts of the Plan period. Any shortfall against projected delivery will need to be addressed through additional sites however, the plan offers practically no flexibility for these to be delivered in sustainable locations later in the Plan period (PSLP2828 Endurance Estates)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Allocate the delivery of homes from West of Braintree Garden Community from 2022/3 onwards, as advised by the promoter/developer. By adding 250 homes (50,100,100) to the 3 years from 2022/3 onwards for W of B this will more accurately reflect the developer's plans and then by increasing the annual

	<p>totals from 2025/6 onwards a delivery of at least 1400 homes can be shown within the Plan Period. (PSLP787 Galliard Homes)</p> <ul style="list-style-type: none"> • The housing trajectory should be revisited using the Sedgfield Method to ensure that the Local Plan complies with the PPG and addresses the current housing need, including any shortfall, in the first five years of the plan. Realistic delivery rates should be used when determining likely annual completions on the Garden Communities sites and additional allocation should be made to cover the shortfall. (PSLP195 Bloomhall) • The trajectory must demonstrate delivery of a total of at least 4,567 dwellings over the first five years of the plan period, comprising 636 dwellings per annum, plus the shortfall accrued since the start of the Plan period and allowing for a buffer of 20% for persistent under delivery. The trajectory should include a windfall allowance of 50 dpa, rather than 70dpa. The strategy of Garden Communities is considered unsound and alternative small deliverable sites need to be allocated to meet the OAN such as 05New15. (PSLP678 Sworders) / 04Cla15 and 05Cla15 in Clavering (PSLP712 Sworders) • Additional allocations are made in sustainable locations. Land at Parsonage Road, Takeley, would, through a single allocation, be capable of closing entirely the gap in housing numbers, and should therefore be considered for allocation. (PSLP2828 Endurance Estates)
41. Appendix 4: Garden Community Principles	
SUPPORT	1
OBJECT	12
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • The draft Local Plan makes it clear that TCPA Garden City Principles will be adhered to and reproduces those principles in Appendix 4. This is very welcome and, if true, would imply a very high quality development with excellent infrastructure. (PLSP1064)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Not clear how the land value capture for the benefit of the community works. With regards payment and explanation of who benefits. (PSLP387) • Unclear as to whether private developers would adhere to such principles even if they were in place. This settlement would not meet the housing needs of those working within the settlement or indeed Uttlesford itself. (PSLP1097) • Clarity required on the intended purpose and status of Appendix 4. In particular, we note that under point 4 it is stated that at least 30% of homes in a new Garden City should be for social rent with a further 30% provided for other forms of affordable housing. This conflicts with Policy H6 which states that 40% affordable housing will be required, unless evidence can be provided to demonstrate viability issues. (Land Securities; PSLP2615)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • We would like to see principle no7 amended to state that trees and woodland should be included in the new garden cities to enable the aspirations of combatting climate change and on flood alleviation to be delivered (The Woodland Trust; PSLP893)

	<ul style="list-style-type: none"> To make this Plan sound, we ask that Policy SP5 is amended to include all users and therefore be consistent with the stated Garden Community Principles at Appendix 4. (Fritch Way Action Group; PSLP626) In order to remove the areas of ambiguity we consider that Appendix 4 should be removed in its entirety. Furthermore, to achieve the target of being zero carbon and free of polluting vehicles within 20 years, would rely on significant advancements within other industries which is beyond our Client control. This reinforces the need to delete the appendix as it is potentially misleading. (Landsec; PSLP2615)
42. Appendix 5: Marketing Assessment Information	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Appendix is unclear and imprecise therefore would not give a decision maker a clear indication of how to react to a proposal (Sworders; PSLP866)
MODIFICATION REQUEST	<ul style="list-style-type: none"> We would like to see principle no7 amended to state that trees and woodland should be included in the new garden cities to enable the aspirations of combatting climate change and on flood alleviation to be delivered (Sworders PSLP866)
43. Appendix 6: Existing Employment Sites Schedule	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
44. Appendix 7: Inset Maps	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
45. Policies Key	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	

SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
46. Policies Map	
SUPPORT	0
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Omission of Safeguarding Zone around IWM Duxford where applications for development will be the subject of consultation with the aerodrome operator. (PSLP2510 Imperial War Museums) • Paragraph 3.82 states that DPDs will be prepared, which will determine the full extent of the land required for each Garden Community. As such, we consider that the Local Plan Proposals Map needs to show the full extent of the land required to deliver the Garden Communities, including any areas required for mitigation purposes, in particular where these are in third party ownership, in order to ensure that the Garden Community and compulsory purchase policies are effective and the latter can be implemented, if necessary. (PSLP2604 Land Securities)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Identify Safeguarding Zone on policies map. (PSLP2510 Imperial War Museums) • Show the full extent of the land required to deliver the Garden Communities, including any areas required for mitigation purposes, in particular where these are in third party ownership. (PSLP2604 Land Securities)
47. Easton Park Garden Community	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
48. North Uttlesford Garden Community	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
49. West of Braintree Garden Community	
SUPPORT	2

OBJECT	
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Support the proposed Inset Map which in effect zones the land area that will form the WoBGC (PSLP2005 Andrewsfield New Settlement Consortium) • The land that comprises the WoBGC (Uttlesford portion) is deliverable over the plan period. (PSLP807 Galliard Homes)
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
50. Arkesden	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
51. Ashdon Church End	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
52. Ashdon	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
53. Barnston	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	

54. Berden	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
55. Birchanger & Parsonage Farm	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
56. Chesterford Research Park	
SUPPORT	1
OBJECT	
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> The allocation is supported (PSLP2035 Aviva Life and Pensions)
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
57. Chrishall	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
58. Clavering Hall Green	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	

59. Clavering	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
60. Debden	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
61. Elmdon	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
62. Elsenham Industrial Estate	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
63. Elsenham	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	

64. Felsted Causeway End	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
65. Felsted Hartford End	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
66. Felsted Watch House Bannister Green	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Allocation of FEL2 is supported (PSLP904 Springfield Planning)
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
67. Felsted	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Omission to include of land north of FEL1. This area of land is proposed to remain undeveloped and is important to help mitigate the visual impact of the proposed development, contain the development within its boundaries and to prevent coalescence with Flitch Green by providing a green landscaped buffer. (PSLP1609 J Young)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Inset Map should be amended to include the area of land that is proposed to be utilised as open space which lies immediately to the west and is within the same ownership.(PSLP1609 J Young)
68. Flitch Green	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN	

SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
69. <u>Great Canfield</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
70. <u>Great Chesterford</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
71. <u>Great Dunmow Central</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
72. <u>Great Dunmow</u>	
SUPPORT	1
OBJECT	
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Support development limits which include land (The Yard) within development limits as it makes a logical extension to adjacent allocated land and is contained by B1256 and A120. (PSLP1617 L Barlow)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> In Great Dunmow Policy Map. Blue hatching for education missing from site allocations GtDUN8 and GtDUN9. GtDUN1 hatching is different from key. (PSLP992 ECC)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Mark all new education land on maps to ensure land is not considered to have residential 'hope' value. (PSLP992 ECC)

73. Great Easton	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
74. Great Hallingbury Bedlars Green	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
75. Great Hallingbury Start Hill	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
76. Great Hallingbury	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
77. Great Sampford	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	

78. Hadstock	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
79. Hatfield Broad Oak	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
80. Hatfield Heath East	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
81. Hatfield Heath West	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
82. Hazel End	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	

83. Hempstead	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
84. Henham	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
85. High Easter	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
86. High Roding	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
87. Leadon Roding	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	

88. <u>Little Dunmow</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
89. <u>Little Easton</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
90. <u>Little Hallingbury North</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
91. <u>Little Hallingbury South</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
92. <u>Littlebury</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	

93. <u>Manuden</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
94. <u>Newport</u>	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Object to omission of land to the south of Bricketts being omitted from Policy NEWP2. (03New15) (PSLP2436 M Flood)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Policy notation for NEWP2 be extended to include land to the south. (03New15) (PSLP2436 M Flood)
MODIFICATION REQUEST	
95. <u>Quendon & Rickling Green</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
96. <u>Radwinter</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
97. <u>Saffron Walden Audley End</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	

98. Saffron Walden Central	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
99. Saffron Walden	
SUPPORT	0
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Object to allocation of Pulse Packaging Radwinter Road as an employment site. (20Saf17) (PSLP1684 The Joint Administrators of Pulse Packaging) • Object to lack of clearly identified green spaces which need to be protected from housing development. (PSLP1803 D Kent) • School playing fields (including Friends School) must be mapped as Protected Open Space (PSLP2376 Saffron Walden TC) (PSLP2969 Saffron Walden and Little Walden Neighbourhood Plan Group)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • The Saffron Walden Inset Map should be amended to remove the employment allocation from the site. The site should be included within the list of sites, within Chapter 29 (20Saf17) (PSLP1684 The Joint Administrators of Pulse Packaging) • The site of the former Friends/Walden School playing fields should be retained as a green lung for sports use • Omission of school playing fields being identified as protected open space. (PSLP2376 Saffron Walden TC) (PSLP2969 Saffron Walden and Little Walden Neighbourhood Plan Group)
100. Swards End	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
101. Stansted Airport	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN	

SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> To the western boundary of the airport site, the Strategic Landscape Area (green check hatch) overlaps the proposed 55ha employment allocation (pink wash). Specifically, this is because the landscape policy line does not follow the strategic planting on site. The Public Safety Zones (PSZ) are chopped off the top and bottom edges of the insert. These are important policy areas and consideration should be given to how the plan could be set out at either a smaller scale to accommodate them, or have the insert across two pages. (PSLP1526 Manchester Airport Groups)
MODIFICATION REQUEST	<ul style="list-style-type: none"> The strategic landscape area line should be corrected to follow the planting on site. This would have the effect of aligning the two policy allocations and not creating overlap. (PSLP1526 Manchester Airport Groups)
102. <u>Stansted Mountfitchet Alsa Street</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
103. <u>Stansted Mountfitchet Central</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
104. <u>Stansted Mountfitchet</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
105. <u>Stebbing</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	

SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
106. <u>Takeley Priors Green</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
107. <u>Takeley Street</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
108. <u>Takeley</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
109. <u>Thaxted</u>	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • A significant number of open spaces are omitted (PSLP2417 Thaxted PC)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Open spaces identified on map. (PSLP2417 Thaxted PC)
110. <u>Wendens Ambo</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	

SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
111. <u>White Roding</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
112. <u>Wicken Bonhunt</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
113. <u>Widdington</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
114. <u>Metropolitan Green Belt</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
115. <u>Countryside Protection Zone</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN	

Statement of Consultation
Summary of Reg 19 Representations Chapters 36-115
Delivery and Monitoring, Glossary and Appendices

SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	

<i>Uttlesford District Council Regulation 19 Pre-Submission Local Plan Summary of Representations</i>	
Sustainability Appraisal	
1. Introduction	
<ul style="list-style-type: none"> Disagree with a number of SA conclusions on Site ELS6 (land West of Station Road) and ELS7 (Land North of Stansted Road) <i>(The Crown Estate PSLP 2759)</i> 	
<ul style="list-style-type: none"> The Council has considered a range of growth options as set out in the Identification of Reasonable Alternatives Paper April 2017. This includes a review of all known new settlement options, as well as a new settlement strategy in combination with other approaches to growth, e.g. development in villages, development in main towns. <i>(Galliard Homes PSLP 775)</i> 	
<ul style="list-style-type: none"> I did not know this question would appear. There has been no mention of the Sustainability Appraisal previously. It is not easy to find. The Guidance Notes don't help, and they don't say where it is either. <i>(PSLP 642)</i> 	
2. Spatial Portrait Vision	
<ul style="list-style-type: none"> The Sustainability Appraisal flaws identified in the North Essex Strategic Section 1 Plans are applicable to UDC Reg 19 Local Plan because it was undertaken by the same organisation and UDC relies wholly on the extension of West of Braintree Garden Community into Uttlesford. The current Reg 19 Plan is unsound and the chosen spatial strategy cannot possibly be demonstrated to be the most appropriate one when considered against reasonable alternatives. <i>(Bloor Homes Eastern PSLP 896)</i> 	
<ul style="list-style-type: none"> 	
<ul style="list-style-type: none"> Provision of multi-user routes with accessibility for all vulnerable road users – pedestrians, cyclists, equestrians and the disabled – should be the default where provision for non-motorised routes is planned within or around any new developments e.g. linking of the Flitch Way where the route is planned to run via the existing and proposed developments around the southern part of Great Dunmow. Its inclusion in the Local Plan would go far to addressing issues of soundness and sustainability. <i>(Flitchway Action Group PSLP 636)</i> 	
<ul style="list-style-type: none"> In Section 5.2.1 of the Sustainability Appraisal the council suggests that the proposed spatial vision "...is particularly strongly aligned to those sustainability objectives related to housing and economic growth, accessibility and sustainable travel..." however, the spatial strategy has taken little to no account of the possible sustainable opportunities for residential development on the edge of Bishop's Stortford. 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. <i>(Bloomhall PSLP 179)</i> 	
<ul style="list-style-type: none"> Use of existing Stansted airport capacity limit to be maintained; Night flights to be reduced; Green spaces to be added; and Environmental limits to be applied <i>(PSLP 1790)</i> 	
<ul style="list-style-type: none"> The area is very short of water, roads are very busy, area is under aircraft noise and there are no local jobs except at Stansted, all 3 'Garden Communities' are predicated on the A120, 	

<p>which will not be able to cope at peak periods and new residents will speed through country roads. The proposed development cannot be contained in the specified area without taking over the whole area. (PSLP 41)</p>
<ul style="list-style-type: none"> • The objective stated in the Local Plan (2c) to maximise the existing capacity of the runway at Stansted Airport is incompatible with a sustainable agenda to reduce carbon emissions – the Local Plan should seek to reduce the number of flights from Stansted Airport, not fill the airport to capacity; and • Statements in the plan about encouraging greater use of public transport are meaningless in the face of the huge expansion of the population that it envisages living in the district. For example, the Cambridge to London Liverpool Street railway line already struggles to handle demand at busier times and the modest increase in capacity referred to in the Local Plan will be woefully inadequate (PSLP 2050)
<p>3. Spatial Strategy</p>
<p>This was compiled by Place Services for UDC and looks in our view to be a classic case of ‘he who pays the piper calls the tune’. There are some good factual points included but also a clear propagandist aspect, such as:</p> <ul style="list-style-type: none"> • Suggesting the 3 new Garden Communities will “be exemplars of 21st Century living”. • Stating that: “There will be convenient, comfortable, safe and affordable environmentally sustainable alternatives to the use of the car...” • Claiming that “development of Garden Communities will alleviate pressures on existing settlements in the later stages of the plan period...” True in some regards (pressures on Newport etc. would otherwise have been even more intense) but overlooking how the Garden Communities will themselves add massively to traffic congestion and will cause other issues. • Suggesting for the valuable Grade 2 agricultural land lost to Garden Communities that yes, this is a negative, but “a pragmatic approach to such losses should be taken within the context of meeting the District’s housing needs”. • Assuming (why?) 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”. • Noting risks exist as regards potential air and noise pollution aspects but remarking that “mitigation can be seen as possible in all instances.....” [so].....”there will be a neutral plan-wide impact”. • Observing how only 2 of 6 Primary schools in Saffron Walden have capacity for additional places but then bushing this aside as “...infrastructure contributions are likely to alleviate such pressures”. <p>Overall, we have doubts regarding the intellectual rigour applied.(PSLP 2651)</p>
<ul style="list-style-type: none"> • The Sustainability Appraisal is inadequate; • Concreting over the countryside cannot be viewed as sustainable and is highly damaging to the environment and to potential food growing supply; • Adding thousands more cars and lorries to narrow town and country roads and lanes can only cause further congestion and add to the current illegal Air Quality as well as diminishing the quality of life for local residents; • The social, environmental and economic impact of the Plan has not been properly assessed; • There are no plans to increase educational and medical facilities which are already at peak

<p>use;</p> <ul style="list-style-type: none"> • There is no sports and leisure strategy, there is no air quality policy, there is an insufficient transport policy; and • There is an unrealistic economic policy- most people commute to London or Cambridge as the few local jobs are poorly paid and residents cannot afford to work and live here, Stansted Airport provides some low-paid work, but most airport employees come from outside of the district.(PSLP 2192)
<ul style="list-style-type: none"> • The Inspector Mr Clews in his letter dated 8th June 2018 point 31 In my view the evidence provided is lacking..... Point 99 and 103 and 109 which states....." I consider that the lack of clarity I have identified in the descriptions of some of the alternatives to the chosen spatial strategy, and in the reasons for selecting them, is likely to breach the legal requirements for the SA report to provide an outline of the reasons for selecting the alternatives dealt with, and for the public to be given an effective opportunity to express their opinion on the report before the plan is adopted." <p>UDC should not have gone forward with regulation 19 regards West Of Braintree knowing this. This is a flagrant waste of public money in all respects..... NEA have wasted £ 4m to get to this stage something that raised the eyebrows of the inspector when it was revealed. How much have UDC used to get to this stage? (PSLP 263)</p>
<ul style="list-style-type: none"> • Transport problems and lack of infrastructure makes NUGC unsustainable. Sections 3.17/18 mention access to M11 and local railway stations. There is no northbound access at local junction 9 and two-lane carriageway in both directions mean it is frequently congested or at a standstill with accidents. Northbound M11 traffic would have to go via country roads to A505 at a congested roundabout, then to junction 10; and • Great Chesterford station has no parking, nor facilities and only a slow stopping service to London or Cambridge. Whittlesford Parkway has limited parking, but again access via country roads to A505.(PSLP 257)
<ul style="list-style-type: none"> • I have read through the spatial strategy document in policy SP2 of the draft local plan, I consider it to be sound and therefore support it. (PSLP 206)
<ul style="list-style-type: none"> • The council have failed to identify appropriate mitigation measures in plan-making, as required by the NPPF. • The NPPG states: "Every area will have different challenges and opportunities for reducing carbon emissions from new development such as homes, businesses, energy, transport and agricultural related development; • This plan has not made any such 'robust evaluation of future emission sources', it does not explore emission reduction options and it disregards the government's target of greenhouse gas emissions; • It has not taken into account any research into human behaviour when making choices of transport options particularly with regard to commuting, to ascertain whether this plan would ensure that CO2 emissions fall quickly enough to reach those targets; • SP6 Easton Park, SP7 North Uttlesford and SP8 Braintree have vague statements about provision of 'direct 'direct, high quality, frequent and very fast rapid, transit priority measures' and choices available to commuters do not include railways. Once houses and roads have been built over a potential railway route, the opportunity for genuinely sustainable transport will be lost for ever;

<ul style="list-style-type: none"> • The cost over the next decades and generations - the lifetime of the new development indeed - of not making this investment at the outset will be incalculable. Affordability must be calculated across such a time frame if we are to be sustainable. Sustainably affordable; • SP7 North Uttlesford – Transport – Audley End station is ignored and future sustainable development should be orientated around existing railway network; • SP8 Braintree – Transport – No mention of trains; • SP11 Stansted Airport: No mention is made of the increases in CO2 emissions or noise or the impact on air quality that would accompany the planned growth. How will it help Uttlesford meet the national carbon emissions reductions to cut emissions by 34% by 2020 and 80% by 2050 below 1990 levels? There is no mention of increased noise in the area, even though the proposed Easton Park Garden Community is immediately adjacent, nor of the negative impact on air quality; • SP 12 - The Sustainable Development Principles contains nothing about meeting national CO2 reduction targets. It is as if Uttlesford regards itself as being exempt from the national requirements to meet the Paris agreement targets; and • The plans mentions 'Promoting development that is located and designed to be energy efficient' but sets no targets for the level of efficiency required. Development today MUST be fit for purpose over the lifetime of the building. Presumably for the next 50-75 years. Houses built now should both be carbon neutral, or very close to it, in order to reduce the risk of calamitous climate change and be equipped to cope with such change in the inhospitable years ahead. This plan sets out not such requirements, standards, vision or expectations. (PSLP 137)
<ul style="list-style-type: none"> • Objective 3b seeks merely to 'Promote' sustainable design. What does 'Promote' mean? It is weak and ineffective. No clear standards are set in the documents to define what level of sustainability is to be required of developers; • It seeks to 'Encourage renewable energy production'. Encouragement is a very weak form of leadership and not a form of government. Encouragement can be easily ignored, as will be so ignored if there are no financial incentives; • It claims to be 'resilient to future climate change.' It does not seek to minimise climate change, show leadership to ensure that our targets under the Paris agreement are met, there is no sense of leadership that Uttlesford, as a prosperous, privileged, economically strong District in a developed country, should do anything to ensure that the radical changes that our needed to minimise the catastrophic effects of climate change will be made here. The plan is supine in respect of sustainability and seeks only to be passively resilient to it; • It claims to support 'sustainable travel' yet wholly ignores the best railway station in the area. The most sustainable form of transport other than walking and cycling is the train. No explanation is given for the decision to totally ignore this railway service and the contribution it could make to sustainability; and • The proposed garden village at Chesterford is beyond commutable walking distance to the station there, which has a far inferior service, and will therefore mean that most commuters will continue to use their cars. (PSLP125)
<ul style="list-style-type: none"> • The plan as it stands will result in a concrete corridor from the airport to Braintree, overflowed by noisy planes and intersected with roads choked with traffic and the dead bodies of animals. The plan is unsustainable and will result in Uttlesford becoming another Hounslow. (PSLP 42)
<ul style="list-style-type: none"> • Objective 3b seeks to 'Promote' sustainable design without establishing clear standards in the documents to define what level of sustainability is to be required of developers. • It seeks to 'Encourage renewable energy production' with no policy for doing this; clearly framed, achievable targets need to be set..

<ul style="list-style-type: none"> • It claims to be 'resilient to future climate change.' It does not seek to minimise climate change and show leadership to ensure that our targets under the Paris agreement are met. • It claims to support 'sustainable travel' yet wholly ignores the best railway station in the area. The most sustainable form of transport other than walking and cycling is the train. • The plan repeatedly refers to the LSCC, the London, Stansted, Cambridge Corridor, which is served by the railway line, but the railway line is being totally ignored at its principle station in Uttlesford! • In Saffron Walden, instead of giving commuters the option of housing where they can walk or easily cycle to the station, we will be housing them on the wrong side of town, where they will: <ul style="list-style-type: none"> ○ add to the traffic congestion ○ further pollute and reduce the air quality and add more CO2 into the atmosphere, accelerating global warming. (PSLP 650)
<ul style="list-style-type: none"> • The Spatial Strategy fails many of its objectives regarding sustainability and transport for the following reasons: <ul style="list-style-type: none"> a. For Stansted Airport to play a major part in this development plan, it must separate its access to the Coach and Train services and its associated parking requirements from those wishing to access it as an airport; and b. The B183 is missing from both the Key Diagram and whole Plan. Yet this road acts a major relief road if the M11 is blocked or closed. The impact of the Eastern Park development needs to be assessed in relation to the existing over-subscription of the B183. This road requires a radical approach for it to sustain the development plan as it stands. The spatial and transport plans are unsound without any consideration of the impact on this road both for the success of the plan and its impact on the local communities. (PSLP 1930)
<p>SP1 – Presumption in favour of Sus. Devt.</p>
<p>Under point 3.20, it is noted that the proposed West of Braintree Garden Community will have good access to the A120 and to the town of Braintree, with its alleged good transport links and employment possibilities. None of these statements are true.</p> <ul style="list-style-type: none"> a. The traffic from the proposed Garden Community has no agreed exit point to access the A 120. In addition, there is, as yet, no funding available for improvements to the A120. b. Braintree has a very small railway station, which is currently single track.. It will take years to upgrade this. If indeed, funding can be obtained for this, which is unlikely considering the time scale involved. c. Braintree Town is dying on its feet, with little employment other than retail and can barely sustain the existing local developments. This, like the proposed W of B G C, is set to become a dormitory town d. The Rapid Transport System proposed under W of B GC Plans was considered by the Inspector looking at BDC's Local Plan to be unachievable in the time scale proposed and uncertain in its implementation, due in part, to a lack of a feasibility study. (PSLP 954)
<ul style="list-style-type: none"> • It is noted that the SA comprises 590 pages, in addition to Annexes A, B and C totalling 232 pages, and a Non-Technical Summary of 57 pages. • In the very limited time available, it has been possible to make only a cursory review of the Non-Technical Summary. The following comments are offered: • 1.2 Sections 36 to 43 inclusive of the Local Plan are not mentioned. • Table 1, Key Local Documents: <ul style="list-style-type: none"> (i) The list of documents does not appear in the Local Plan consultation document, and

thus the documents listed will not necessarily have been taken into account in responses.

- (ii) There is a need for absolute consistency in the naming of documents as they appear in the list and on the documents themselves.
 - (iii) There is a need to include the web addresses where documents can be found, particularly those published by Uttlesford District Council.
 - (iv) The list includes Housing Strategy 2012-15 (Uttlesford District Council, 2012). But Uttlesford District Council Housing Strategy 2016-21 is available and included as one of the documents which make up the Local Plan.
 - (v) The list includes Strategic Housing Market Assessment (2012 [new assessment commissioned expected 2015]). Clearly the note makes little sense in a document published in 2018. In fact, there is a more recent, but less detailed, SHMA dated 2017.
- In the circumstances of lack of time and notice, the Parish Council is unable to comment further on the Sustainability Appraisal, but reserves the right to do so later if deemed appropriate. **(Elsenham Parish Council PSLP 259)**

- The Reg 18 and Reg 19 Sustainability Appraisals are very similar in most respects;
- Of the seven scenarios (A to G) none resembles the current strategy with Scenario E based on 750 dwellings per annum and two new settlements being the closest;
- In consideration of SP2 –The Spatial Strategy, all the seven scenarios are reviewed and described as unreasonable alternatives to SP2. The scenarios should have been regarded as less well developed pre-cursors to the preferred strategy;
- The hybrid option of 3 new settlements distribution across the wider district warrants further exploration and testing within the SA;
- Scenario E was rejected on the premise that reliance on 1 or 2 large sites would have deliverability issues and deprive other settlements of sustainable growth and the strategy proposed by the Council based on 3 garden villages would therefore have more adverse impact;
- Alleged need of three garden communities emerges from nowhere;
- In Policy SP3, of the four alternatives, the three alternatives providing less housing should not have been considered;
- In Policy SP5, impacts in the short and medium term are neutral in relation to all fifteen sustainability objectives and positive impacts are only indicated for the long term. The appraisal of the overarching Policy 5 and SP6, SP7 and SP8 do not explain or justify the benefits of the preferred strategy;
- In policies SP6, SP7, and SP8 the impacts on sustainability objectives other than neutral are identified in the long term;
- The SA is flawed as it does not show how the preferred strategy emerged from a range of plausible alternatives and therefore provides a wholly unsound underpinning for the emerging Local Plan;
- The three principal shortcomings identified in the SA for the NEA Plan namely: first - the objectivity of the assessment of the chosen spatial strategy and alternatives to it; second - the clarity of the descriptions of those alternatives and of the reasons for selecting them, and third - the selection of alternative GCs and combinations of GCs for assessment. These shortcomings are considered applicable to the UDC Local Plan SA. **(Eclipse Planning PSLP 2278)**

- Hospital bed provision is a big problem as Broomfield, Harlow and Addenbrookes are already over full and the new garden community residents will need at least one new hospital. NHS involvement in the planning exercise is queried;
- The Inspector for the NEA Plan indicated that the spatial strategy for WoBCC is unreliable. In the assessment of the chosen spatial strategy against alternatives that do not include GCs

<p>the report made optimistic assumptions about GC benefits and negative assumptions about alternatives and the assessment lack objectivity and therefore unreliable;</p> <ul style="list-style-type: none"> • No firm view on the feasibility of either WoBGC or CBBGC can be taken until it is known whether or not the A120 dualling scheme is included in that (RIS2) programme (or can be otherwise fully funded); • No evidence Rapid Transport System is viable; • The decision to site 2 garden communities in the south east corner of Uttlesford is fundamentally unsound. There is no evidence that the area can provide the necessary transport infrastructure, water supply, or employment opportunities required to support 20000 extra new homes. UDC does not have the power to make these necessities happen and simply resorts to wishful thinking (as does BraintreeDC in its GC proposal). • The combined effect of the WBGC and the Easton GC will be to urbanise the entire length of the A120 from Braintree to Stansted. This will completely change the essentially rural nature of the area and will adversely affect the air quality, noise pollution and general quality of life for all who currently live in the southern part of the UDC area. • There is no evidence that UDC is capable of delivering 3 GCs in the time scale given. The Inspector states that he does not consider 3 DCs capable of such a task so how would UDC be so much more competent? (PSLP 723)
<ul style="list-style-type: none"> • The SA results are unreliable in the proposal to concentrate the bulk of the new housing in 3 GCs. • The NEA Plan Inspector indicated that in assessing the chosen spatial strategy against alternatives that did not include GCs, the authors of the SA report had generally made optimistic assumptions about the benefits of GCs, and correspondingly negative assumptions about the alternatives, without evidence to support many of those assumptions. As a result these assessments lack the necessary degree of objectivity and are therefore unreliable. • With regard to SP2 -7 relating to infrastructure: • A120 is already saturated several times a day and cannot cope with the traffic to be generated from WoBCC and Easton Park Garden Community. • The funding of the A120 dualling is not guaranteed. • There is no evidence Rapid Transport System is viable.(PSLP 721)
<p>SP2 – Spatial Strategy 2011-2033</p>
<p>Scenario B of section 5.3.2 of the SA fails to represent a reasonable alternative for growth as it excluded the main towns within the district. Scenario G; however, which was discounted suggested that three rather than two new settlement be considered. The reference in scenario G to growth in Bishop's Stortford has however, been dropped from the further investigations identified and as such the approach is not justified as the potential for sustainable development at Bishop's Stortford has not been further investigate alongside the three proposed new settlements as a reasonable alternative or as a complimentary approach to help delivery and thereby the effectiveness of the Local Plan. (Bloomhall, Planserv; PSLP183)</p>
<p>Given the length of the SA document (590 pages) and its detailed content, it is unreasonable for UDC to demand that residents may a very time-consuming and considered response as a prerequisite to making a comment to the consultation. (PSLP435)</p>
<p>SA fails to justify the choices made and that it has not been demonstrated that the chosen spatial strategy is the most appropriate one when considered against the reasonable alternatives, as the tests of soundness require." As the Regulation 19 SA has been undertaken by the same organisation</p>

as the North Essex Section 1 Plan and relies wholly upon the West of Braintree Garden Community to be extended into Uttlesford, it is clearly seriously flawed and unsound for the principal reasons and shortcomings identified by the Inspector. For this reason above, the current Reg 19 Plan is unsound and the chosen spatial strategy cannot possibly be demonstrated to be the most appropriate one when considered against reasonable alternatives. (Bloor Homes, Eastern, PSLP898)

The Sustainability Appraisal is clearly flawed for reasons set out in the letter dated 8th June 2018 from the Inspector examining the North Essex Strategic Section 1 Plans. The Inspector's findings and identification of the shortcomings of the SA, referred to in paragraphs 93-129 of his letter, are particularly relevant and also apply to the UDC Plan because the WoBGC is proposed to be extended into Uttlesford. In particular he found "that the SA fails to justify the choices made and that it has not been demonstrated that the chosen spatial strategy is the most appropriate one when considered against the reasonable alternatives, as the tests of soundness require." As the Regulation 19 SA has been undertaken by the same organisation as the North Essex Section 1 Plan and relies wholly upon the West of Braintree Garden Community to be extended into Uttlesford, it is clearly seriously flawed and unsound for the principal reasons and shortcomings identified by the Inspector. For this reason above, the current Reg 19 Plan is unsound and the chosen spatial strategy cannot possibly be demonstrated to be the most appropriate one when considered against reasonable alternatives. (PSLP2473)

The Sustainability Appraisal and assessment of the suitability of the proposed Garden Communities at North Uttlesford and West of Braintree should be the subject of discussion at the Local Plan Examination. In this regard we note the emerging position in relation to the North Essex Authorities (NEA) Local Plan, which includes the majority of the West of Braintree Garden Community. It is presently unclear how the NEA intend to progress with their Local Plan, and therefore the robustness of the West of Braintree allocation in the Uttlesford Local Plan. The Sustainability Appraisal (SA) of the Garden Communities does not explicitly confirm that the full allocations have been assessed, as opposed to being limited to those parts to be delivered during the plan period. The SA should be amended so that it is explicitly clear that the total allocations for the Garden Communities have been assessed i.e Easton Park 10,000 units. (Landsec, PSLP2587)

This was compiled by Place Services for UDC and looks in our view to be a classic case of "he who pays the piper calls the tune". There are some good factual points included but also a clear propagandist aspect, such as:

- Suggesting the 3 new Garden Communities will "be exemplars of 21st Century living".
- Stating that: "There will be convenient, comfortable, safe and affordable environmentally sustainable alternatives to the use of the car..." •
- Claiming that "development of Garden Communities will alleviate pressures on existing settlements in the later stages of the plan period..." • True in some regards (pressures on Newport etc would otherwise have been even more intense) but overlooking how the Garden Communities will themselves add massively to traffic congestion and will cause other issues.
- Suggesting for the valuable Grade 2 agricultural land lost to Garden Communities that yes, this is a negative, but "a pragmatic approach to such losses should be taken within the context of

meeting the District's housing needs".

- Assuming (why?) 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".
- Noting risks exist as regards potential air and noise pollution aspects but remarking that "mitigation can be seen as possible in all instances....."
- [so]....."there will be a neutral plan-wide impact".
- Observing how only 2 of 6 Primary schools in Saffron Walden have capacity for additional places but then bushing this aside as... "infrastructure contributions are likely to alleviate such pressures". Overall, we have doubts regarding the intellectual rigour applied. (PSLP2651)

1.2 Sections 36 to 43 inclusive of the Local Plan are not mentioned.

Table 1, Key Local Documents:

- a. The list of documents does not appear in the Local Plan consultation document, and thus the documents listed will not necessarily have been taken into account in responses.
- b. There is a need for absolute consistency in the naming of documents as they appear in the list and on the documents themselves.
- c. There is a need to include the web addresses where documents can be found, particularly those published by Uttlesford District Council.
- d. The list includes Housing Strategy 2012-15 (Uttlesford District Council, 2012). But Uttlesford District Council Housing Strategy 2016-21 is available and included as one of the documents which make up the Local Plan.
- e. The list includes Strategic Housing Market Assessment (2012 [new assessment commissioned expected 2015]). Clearly the note makes little sense in a document published in 2018. In fact, there is a more recent, but less detailed, SHMA dated 2017.

In the circumstances of lack of time and notice, the Parish Council is unable to comment further on the Sustainability Appraisal, but reserves the right to do so later if deemed appropriate. (Elsenham Parish Council; PSLP312)

Scenario B of section 5.3.2 of the SA fails to represent a reasonable alternative for growth as it excluded the main towns within the district. Scenario G; however, which was discounted suggested that three rather than two new settlement be considered. The reference in scenario G to growth in Bishop's Stortford has however, been dropped from the further investigations identified and as such the approach is not justified as the potential for sustainable development at Bishop's Stortford has not been further investigate alongside the three proposed new settlements as a reasonable alternative or as a complimentary approach to help delivery and thereby the effectiveness of the Local Plan. (Bloomhall; PSLP183)

Easton Park alone would eventually have 10,000 dwellings. On the basis that the vast majority would be taken up by persons wishing to escape from London, they are likely to be families. A conservative

estimate would be 3 people per dwelling so more than a 30% increase on the current population. Current transport links and facilities could not cope with this and any proposed improvements such as rail links would only serve to make the area become a suburb of London. (PSLP21)

4.1 The site is assessed under reference THA4 of the emerging Plan's Sustainability Appraisal (SA) and the conclusions are largely positive.

4.2 The site is anticipated to have significant positive impacts on criteria relating to Groundwater Source Protection Zones, Green Belt, Countryside Protection Zones, ancient woodlands, minerals and waste facilities, public safety zones associated with Stansted Airport proximity to public transport, community facilities, delivering affordable housing and avoiding the loss of employment land.

4.3 Positive impacts are identified in relation to the sustainability criteria for the conservation and enhancement of biodiversity, retention of TPOs, historic lanes, pollution, flood risk, cycleways and footpaths, proximity to shopping and a secondary school, PRoWs or bridleways, delivering a suitable housing mix, utilities connectivity and capacity in a nearby secondary school.

4.4 A number of comments are made in response to the assessment scores:

- The SA identifies a significant negative effect for proximity of water bodies, which is attributed when a water body is on the site according to the assessment pro forma. There is no water body on the site, the nearest being the stream within the existing hedgerow on the southeastern border. The Site Location Plan in Appendix 1 confirms this does not fall within the site.
- The SA awards a negative score for the site's moderate to high sensitivity to change taken from UDC's HSCA. As discussed in the SHLAA critique, this assessment does not include a site-specific assessment and the evidence accompanying these representations confirms the site is entirely deliverable with minimal impact. Additionally, a number of other sites, including allocated sites, score negatively against this criterion and therefore sites cannot be ruled out for this reason without compromising the ability of the emerging Plan to deliver the required amount of housing.
- As greenfield land, the site is considered to have significant negative impacts with regards to prioritising the development of brownfield land ahead of greenfield. The lack of available brownfield land to meet housing need requires greenfield land to be allocated. Indeed, the vast majority of sites put forward for consideration are greenfield and limiting development on this basis would fail to deliver sufficient housing to meet local needs. In delivery terms greenfield land is superior to brownfield, with development able to begin without the delay of any demolition or remediation works required which is integral to addressing the lack of a 5-year housing land supply in Uttlesford.
- Negative scores are identified for the site's location outside but adjacent to the settlement boundary and the presence of grade 2 agricultural value of the land as existing. Almost all other sites put forward, with the exception of one, scored negatively or significantly negatively against these criteria meaning the site is one of the better performing options despite receiving a negative score. Sites should not be discounted on this basis as the emerging Plan would be unable to deliver sufficient housing to meet identified need in this location.

- The SA anticipates a negative impact on heritage assets from development of the site but acknowledges that mitigation is possible. The accompanying site-specific evidence confirms that any impact of development on heritage assets would result in the lower end of the less than substantial harm definition and the capacity for mitigation means the site should not be

viewed negatively in this respect.

- A negative score is awarded against flood risk, with the assessment locating the site within Flood Zone 2. This is inaccurate, as the site is entirely within Flood Zone 1. The site should be attributed a significant positive score.

- Negative scores are awarded against criteria for proximity to GP services and a primary school as well as the quality of the potential site access. An appeal decision on Land off Walden Road confirmed the sustainability of the village including accessibility to a wide range of services in line with Thaxted's role as a Key Village. This is discussed further in section 3 below. Access to the site is perfectly achievable through the existing development to the north and the supporting highways note confirms this. The site should therefore not be scored negatively against any of these criteria.

- The SA identifies a negative score against the Accessible Natural Greenspace Standard. All other sites in Thaxted scored the same or worse, including two allocated sites that scored significant negatives. In site selection terms, the site performs well against this criterion compared with alternative sites.

- A significant negative score is provided against the recreational space criterion, which suggests development of the site is expected to result in a loss of recreational space. This is an incorrect assumption as the site is agricultural land is not currently used for recreation.

- The assessment scores the site uncertain for the proposed density of development. The illustrative layout demonstrates that the proposals would sit comfortably within the site and development would seek to align with UDC's density policy as required. This score should be positive for the site.

- Primary school capacity is identified as an issue within the assessment, as is the case for a number of other sites including two allocated sites. Site selection should therefore not be based on the capacity of primary schools otherwise it would not be possible to allocate sufficient sites to meet housing need.

- The site is marked negatively for the distance to main employment areas, along with every other site in Thaxted. Discounting sites for allocation based on this criterion would mean housing need would be unmet in the village.

4.5 Linden Homes requests that the Sustainability Appraisal supporting the emerging Plan is updated to reflect these comments and the evidence presented to support them.

(Linden Homes; PSLP1574)

It is arbitrary and does not adequately support the Spatial Strategy or the selection of sites and

allocations. (PSLP1866)

SP3 – Scale and Distribution

- The SA document unclear and focuses on the reason why all the alternatives were not appropriate rather than why the specified approach was chosen
- The chosen option shows a stepped change in the housing target against a housing requirement of 14,000. No explanation has been given as to why a flat trajectory rather than a stepped trajectory should not be employed. It is unclear if the evaluation of the chosen option is based on a stepped or flat trajectory and there is no specific evaluation of a non-stepped trajectory
- The North Essex Inspector has concluded that the Sustainability Appraisal prepared by the three Local Authorities for their Joint Strategic Plan which underpins the West of Braintree Garden Community allocation is legally flawed, as it has failed to undertake a proper testing of reasonable alternatives development options. Nor is it based upon sound evidence. Given, that the Sustainability Appraisal for the Uttlesford Draft Local Plan has been produced by the same author, and is underpinned by the work undertaken in respect of the Joint Strategic Plan, it follows that it is highly unlikely that the West of Braintree Garden Community element of the Draft Plan is legally compliant (PSLP2216, Stebbing Parish Council)
- The SA does not mention sections 36-43 of the plan (PSLP314, Elsenham Parish Council)
- The SA could be clearer in how it presents background documents (PSLP314, Elsenham Parish Council)
- It is noted that the Sustainability Appraisal for Policy SP3 concludes that there would be significant positive benefits for SA Objective 12 - to provide appropriate housing and accommodation to meet existing and future needs. We disagree with those conclusions, since the stepped trajectory and the use of the 'Liverpool' approach seek to not meet housing needs in the short term and therefore there would be negative effects for SA Objective 12. The alternative option of not applying the stepped trajectory or the 'Liverpool' approach has not been considered or assessed. It is requested that the SA for Policy SP3 is reassessed and includes the alternative option of not applying the stepped trajectory or the 'Liverpool' approach.
- It is requested that the SA for Policy SP3 is reassessed in terms of the effect of the stepped trajectory and the use of the 'Liverpool' approach on SA Objective 12, and that the alternative option of not applying these approaches is also assessed.
- In the Regulation 19 Local Plan Sustainability Appraisal the candidate sites relating to Hatfield Broad Oak are all rejected for various reasons. Site Option 08HBO017 HBO7, which relates to Land North of Hammonds Road, was rejected. The reasoning has been informed by the site consideration in the 2018 SHLAA (Reference 08HBO017). Site 08HBO17 was identified as an allocation after the 2015 call for sites. It appears that the site allocations for Type A villages were already decided by the time this site was put forward, and that this site was not seriously considered as an alternative. Objection is made to Hatfield Broad Oak not being allocated for development (outlined in the table in attached document) based on the above reasons

<ul style="list-style-type: none"> The Sustainability Appraisal and the identification and selection of options is not robust and is arbitrary <p>Linden Homes requests that the Sustainability Appraisal supporting the emerging Plan is updated to reflect these comments and the evidence presented to support them.(Linden Homes; (PSLP1576, PSLP1574)</p>
SP4 – Provision of Jobs
None
SP5 – Garden Community Principles
None
SP6 – Easton Park GC
<p>We consider there are some shortcomings with the sustainability appraisal. Paragraph 7.4.5 of the Sustainability Appraisal itself considers new garden communities and assesses them against the sustainability objectives including objective 4 in relation to the historic environment. The SA concludes uncertain impacts when in our view it is clear that there would be major significant impacts from the development proposed. The SA plays down the potential impact and is therefore somewhat misleading.</p> <p>The sustainability appraisal appears to only consider the dwellings within the garden communities that are likely to come forward during the plan period. It would be helpful if the sustainability appraisal would also consider the full dwelling capacity of these proposed garden communities to assess the suitability (or otherwise) of the proposals in terms of the impact on the historic environment and other facets of sustainable development. For example, Appendix 4 does not consider the full quantum of development currently being considered for each site (eg only 2,500 dwellings at Great Chesterford).(Historic England; PSLP1835)</p>
It is arbitrary and does not adequately support the Spatial Strategy or the selection of sites and allocations. (PSLP1869)
As highlighted in the LEPC representation, the Sustainability Appraisal is inaccurate with respect to Easton Park in a number of material ways and has not been undertaken in a consistent way with other sites. It appears that the evidence has been made to fit the selection of Easton Park. (Stop Easton Park; PSLP2307)
There are a number of inaccuracies and omissions in the appraisal of new settlement options in Sustainability Appraisal in respect of Easton Park. This is a key document in the assessment of the new settlement options as it is the tool used to assist UDC in the selection of Garden Communities across the wider area and the inaccuracies are of a material nature. LEPC contend that the appraisal of Garden Community options (preferred and alternative) within this SA has NOT been undertaken in

a fair and consistent manner and that these errors underplay the sustainability impacts of the Easton Park proposed site. A number of the following points were made in the Regulation 18 consultation but have been ignored by UDC. The following comments relate to Table 87 in the Sustainability Appraisal – Appraisal of New Settlement Options: (see attached for full details) SA Objective 3 and SA Objective 5.(Little Easton Parish Council; PSLP2346)

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. For example, page 261 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.” (PSLP1527, Manchester Airport Group)

SP7 - North Uttlesford GC

Transport – Sustainability Appraisal

- It can also be noted that the SA appraisal of the NUGC site from page 213 of the SA gives the site a positive score in regard to sustainable travel despite noting in the commentary that ‘It would also be expected that there would be a large amount of commuting outside the District for jobs would be by car’ (SA Objective 9).
- In regard to SA Objective 13 (Infrastructure) it can be noted that whilst the objective is to ensure the necessary infrastructure is provided to support each new garden community the site selection criteria and the commentary make no reference to the deliverability of transport infrastructure concentrating only on recreation, allotments and utilities provision.
- It is not clear how these impacts have been taken into account and mitigated by the Local Plan.

Landscape – Sustainability Appraisal

- The Sustainability Appraisal (SA) of policy SP7 regarding the NUGC at pages 75/76 states in relation to its landscape / visual and heritage aspects of the policy that ‘the potential for impacts to be significant cannot be ruled out until further details are known’, and that no proposal would be permitted unless it satisfies policy requirements for mitigation. However this assumes that there will be effective mitigations available given that the SA appraisal of the NUGC site in Appendix 1 of the SA (as opposed to the appraisal of policy SP7) identifies significant adverse impacts in regard to landscape and heritage of which there can be no certainty that appropriate mitigation can be achieved.
- In regard to SA objective 7 concerned with pollution it can be noted that the appraisal does not take light pollution into account when the NUGC could be expected to be highly visible on winter evenings and mornings.

Paragraph 152 of the NPPF in regard to plan making states that local planning authorities should seek opportunities to achieve each of the economic, social, and environmental dimensions of sustainable development and states that: ‘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’.

However, a number of significant harms regarding the NUGC have been identified in regard to transport and landscape. A revised NUGC development could reduce its harm by avoiding any built development on the north, west and eastern edges of the high plateau, subject to effective landscape mitigations, sensitive street lighting and suitable building heights, and by avoiding built development on the slopes facing towards the A11. This could be achieved by reducing the overall scale of the new settlement to that which could be so accommodated or by amending its southern boundary. The Council does not offer a preference for an alternative site boundary; the issue for South Cambridgeshire District Council is the impact of the current NUGC proposal on its area.

However, possible means by which this could be achieved are by excluding areas from the allocation where built development would cause landscape harm to South Cambridgeshire, or by making clear in the Local Plan the areas where build development could not occur (if those areas are necessary for strategic landscaping or other measures in the allocation). If this resulted in a reduced number of homes, the option to extend the southern boundary of the allocation could be considered. (South Cambridgeshire District Council PSLP2689)

Our R18 LP representation questioned the adequacy of the approach to identifying alternative growth locations in developing the plan. The R19 SA seeks to answer that question by stating that: previously rejected sites were re-considered due to the increased growth requirement arising from the Governments Right Homes in the Right Places consultation; this approach failed to identify sufficient smaller sites, leading to consideration of larger sites on which to develop Garden Communities; and criteria used to identify larger sites were that they should be as self-contained as possible, so it should provide jobs so people have the opportunity to work nearby to where they live and have the ability to sustain a secondary school, and one or more local centres with shops and community facilities.

3.8 This response does not properly address the question which is why the Council considered only sites submitted to them and did not undertake a holistic review of their district to identify the locations that are most appropriate, having regard to landscape and environmental capacity and transport assessments.

3.9 We propose again that the plan should be based on a bottom-up assessment of appropriate locations informed by landscape and environmental capacity and transport assessments. Garden Community selection

3.10 We previously asked whether there is a risk that the selection of the Garden Communities chosen for LP allocations looks pre-determined because the sustainability appraisal does not give

weight to any criteria or draw conclusions about the most sustainable settlement overall.

3.11 The R19 SA states that it does not draw overarching conclusions but presents relevant impacts to the LPA which are not quantifiable, and that it is not the principle evidence base documents on which site allocations and policy approaches should be selected.

However, PPG is clear that Sustainability Appraisals should provide conclusions on the overall sustainability of the different alternatives, including those selected as the preferred approach in the Local Plan and outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives. PPG also provides that Sustainability Assessments also: should inform the selection, refinement and publication of proposals; should identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them; and must consider all reasonable alternatives and assess them in the same level of detail as the option the plan-maker proposes to take forward in the Local Plan (the preferred approach).

3.12 It is therefore not clear why NUGC was selected when: the combined settlement options comprising West of Braintree, Easton Park and Chelmer Mead performed most strongly when assessed against sustainability objectives; and NUGC performs worst or equal-worst in terms of ability to conserve or enhance water quality, conserve or enhance landscape character and townscape, and the ability to maintain or enhance cultural and heritage assets and their settings.

These findings were highlighted in our representation to the R18 LP. The response given in the R19 SA to our questions states that the selection is supported by wider local plan policies that seek to ensure: the mitigation and minimisation of impacts of development; that the selected communities achieved good scores in terms of efficient use of resources and sustainable use of land; and that further details will be provided in the Garden Community Development Plan document (Chapter 3 and Appendix 7).

3.14 Whilst it is recognised that the SA is strategic in nature, it is not clear that the strategy can be properly justified until further detailed assessments are undertaken to understand the ability to mitigate the significant challenges identified in the SA associated with water quality and heritage conservation.

3.15 However, PPG is clear that SAs are important evidence base documents that should inform the proposal selection and refinement and identify the measures envisaged to prevent, reduce and offset likely adverse effects.

There remains a lack of evidence that the challenges previously identified can be mitigated. 3.16 Given the relative performance of the Garden Communities to one another identified in the R18 and R19 SAs, without further information it remains unclear that the settlements selection has been properly justified. (Welcome Trust; PSLP2975)

Defective procedures regarding selection of NUGC site. The NUGC site came forward in 2015 in response to UDC's Call for Sites, and was then subject to critical preliminary assessment by UDC Officers, in regard to which GCPC submitted detailed comments in April 2016 and to which UDC failed to respond. Between that date and early 2017 UDC's assessment of the NUGC site was not subject to any further formal examination, only an internal non-public "iterative process", culminating in an "interim non-statutory Sustainability Appraisal" of the draft Plan "at the Regulation 18 stage".

Failure of UDC to afford GCPC the opportunity to explain further its concerns, and to enable it to participate in UDC's informal review process, wrongly excluded GCPC from proper or effective consultation (see Section 6 and Section 4 paragraph 2.1 to 2.4). NUGC is almost exclusively to serve need of South Cambridgeshire, despite South Cambs District Council at ever stating there is any such requirement, or that it is needed or is justified (see Sections 4, 6 and 7). 3.1.2 it has not been prepared or based on a strategy which seeks to meet infrastructure requirements: 3.1.2.1 as set out in Sections 2, 4, 5 and 7 the infrastructure requirements of NUGC are adding to, rather than solving, infrastructure requirements of the District. 5,000 houses in the selected location are not sustainable, and the as yet unknown and uncounted mitigation measures required cannot be demonstrated to be deliverable.

The June 2018 UDC Infrastructure Delivery Plan is almost all one needs to read in this regard. The phrase unknown at this time is features so heavily in the "Annex schedule - Garden Communities and Settlements" in relation to NUGC it is self-evident any strategic infrastructure think is still far, far from where it needs to be.

3.1.3 in preparing the draft Plan, UDC has failed adequately to consider inclusion of unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development: 3.1.3.1 as set out in Sections 2 and 4, and elsewhere in this Response, Policy SP7 will simply serve to provide workers in South Cambridgeshire, Cambridge City and London with a place in which to live; it does not address Uttlesfords housing needs, whether objectively assessed or otherwise. 3.2 The draft Plan is not Justified: 3.2.1 the draft Plan is not the most appropriate strategy when considered against the reasonable alternatives based on proportionate evidence.

4.1.10 It is noted that the Sustainability Appraisal considers no impacts to arise from this policy in

terms of SEA objectives 6 (climatic change) and 7 (pollution). In terms of SEA objectives 9 (sustainable transport) and 12 (meeting housing needs) no impacts are predicted over the short to medium term, with significant impacts in the long term. However, for the reasons set out above, it is unclear how such an assessment can be made in light of the evidence available. (Great Chesterford Parish Council; PSLP2316)

It is unclear that the numbers of houses needed is correct they appear to be based on a 93% uplift over baseline growth on the sole grounds of need for employment Stansted Airport. (PSLP2078 & PSLP2341; Little Chesterford Parish Council)

UDCs own Sustainability Appraisal (SA) of Policy SP7 relating to NUGC says about the site that significant impacts resulting from landscape, visual and heritage aspects of the Policy cannot be ruled out until further details are known, and that proposals will not be permitted unless requirements for mitigation are met. This assumes effective mitigations are possible. We believe that such mitigations cannot be found in relation to this particular site.

Appendix 1 of the SA indeed identifies significant adverse impacts in relation to landscape (and heritage). The SA states there can be no certainty that appropriate mitigation can be achieved. We say the inclusion of NUGC in the Local Plan means it cannot be justified and has not been positively prepared. There is no sign that reasonable alternatives to NUGC have been considered which would have a reduced impact on the landscape. (Ickleton Parish Council; PSLP2975)

[The North Essex Inspector also raised the point that the assessment of the chosen spatial strategy against alternatives that do not include garden communities had generally made optimistic assumptions about the benefits of garden communities, and correspondingly negative assumptions about the alternatives, without evidence to support many of those assumptions.

As a result, the Inspector's letter stated, "these assessments lack the necessary degree of objectivity and are therefore unreliable". Appendix 5 of the Uttlesford Regulation 19 Sustainability Appraisal makes the comparison between "traditional approaches" vs new "garden communities". Whilst it is appreciated that this is a somewhat theoretical assessment, it would appear that this is written to give the impression that garden communities are a much more preferable option. For every criterion "garden communities" score better than "traditional approaches", which simply cannot be the case if an objective view is taken.

The assessment scores new settlements a "+" and traditional approaches "?" for encouraging sustainable patterns of development which does not appear to be fair, when existing infrastructure and services will be in place in existing settlements and in garden communities everything is starting from scratch and likely to be phased. Also In relation to providing appropriate housing and accommodation to meet existing and future needs, again new settlements are scored as a "++"

whereas traditional approaches only a "+". What the assessment of this criteria clearly fails to consider is issues such as meeting needs where they arise or preventing households breaking up and having to move away to satisfy their housing needs, which must form a key social component

of the assessment criteria.

There are a number of instances which question the objectivity of this assessment, which have knock on effects for the remainder of the assessment of the Strategic Options and needs to be reassessed more objectively.

4.1 The site is assessed under reference THA4 of the emerging Plan's Sustainability Appraisal (SA) and the conclusions are largely positive.

4.2 The site is anticipated to have significant positive impacts on criteria relating to Groundwater Source Protection Zones, Green Belt, Countryside Protection Zones, ancient woodlands, minerals and waste facilities, public safety zones associated with Stansted Airport proximity to public transport, community facilities, delivering affordable housing and avoiding the loss of employment land.

4.3 Positive impacts are identified in relation to the sustainability criteria for the conservation and enhancement of biodiversity, retention of TPOs, historic lanes, pollution, flood risk, cycleways and footpaths, proximity to shopping and a secondary school, PRoWs or bridleways, delivering a suitable housing mix, utilities connectivity and capacity in a nearby secondary school.

4.4 A number of comments are made in response to the assessment scores:

- The SA identifies a significant negative effect for proximity of water bodies, which is attributed when a water body is on the site according to the assessment pro forma. There is no water body on the site, the nearest being the stream within the existing hedgerow on the southeastern border. The Site Location Plan in Appendix 1 confirms this does not fall within the site.

- The SA awards a negative score for the site's moderate to high sensitivity to change taken from UDC's HSCA. As discussed in the SHLAA critique, this assessment does not include a site-specific assessment and the evidence accompanying these representations confirms the site is entirely deliverable with minimal impact.

Additionally, a number of other sites, including

allocated sites, score negatively against this criterion and therefore sites cannot be ruled out for this reason without compromising the ability of the emerging Plan to deliver the required amount of housing.

- As greenfield land, the site is considered to have significant negative impacts with regards to prioritising the development of brownfield land ahead of greenfield. The lack of available brownfield land to meet housing need requires greenfield land to be allocated. Indeed, the vast majority of sites put forward for consideration are greenfield and limiting development on this basis would fail to deliver sufficient housing to meet local needs. In delivery terms greenfield land is superior to brownfield, with development able to begin without the delay of any demolition or remediation works required which is integral to addressing the lack of a 5-year housing land supply in Uttlesford.
- Negative scores are identified for the site's location outside but adjacent to the settlement boundary and the presence of grade 2 agricultural value of the land as existing. Almost all other sites put forward, with the exception of one, scored negatively or significantly negatively against these criteria meaning the site is one of the better performing options despite receiving a negative score. Sites should not be discounted on this basis as the emerging Plan would be unable to deliver sufficient housing to meet identified need in this location.
- The SA anticipates a negative impact on heritage assets from development of the site but acknowledges that mitigation is possible. The accompanying site-specific evidence confirms that any impact of development on heritage assets would result in the lower end of the less than substantial harm definition and the capacity for mitigation means the site should not be viewed negatively in this respect.
- A negative score is awarded against flood risk, with the assessment locating the site within Flood Zone 2. This is inaccurate, as the site is entirely within Flood Zone 1. The site should be attributed a significant positive score.
- Negative scores are awarded against criteria for proximity to GP services and a primary school as well as the quality of the potential site access. An appeal decision on Land off Walden Road¹ confirmed the sustainability of the village including accessibility to a wide range of services in line with Thaxted's role as a Key Village. This is discussed further in section 3 below. Access to the site is perfectly achievable through the existing development to the north and the supporting highways note confirms this. The site should therefore not be scored negatively against any of these criteria.
- The SA identifies a negative score against the Accessible Natural Greenspace Standard. All other sites in Thaxted scored the same or worse, including two allocated sites that scored significant negatives. In site selection terms, the site performs well against this criterion compared with alternative sites.
- A significant negative score is provided against the recreational space criterion, which suggests development of the site is expected to result in a loss of recreational space. This is an incorrect assumption as the site is agricultural land is not currently used for recreation.

- The assessment scores the site uncertain for the proposed density of development. The illustrative layout demonstrates that the proposals would sit comfortably within the site and development would seek to align with UDC's density policy as required. This score should be positive for the site.
- Primary school capacity is identified as an issue within the assessment, as is the case for a number of other sites including two allocated sites. Site selection should therefore not be based on the capacity of primary schools otherwise it would not be possible to allocate sufficient sites to meet housing need.
- The site is marked negatively for the distance to main employment areas, along with every other site in Thaxted. Discounting sites for allocation based on this criterion would mean housing need would be unmet in the village.

Housing requirement of 14,600 dwellings (2011 to 2033) not based on a sound assessment of housing needs for the Housing Market Area. The level of delivery will lead to a considerable shortfall in housing supply (Persimmon; PSLP2672;)

UDC housing supply of 14,712 falls 258 units below its 14,000 dwelling requirement if West of Braintree GC does not happen/If other two garden communities do not happen or are delayed then the Council will fall well below its housing requirements. The Council must seek to improve its housing supply position (Chase New Homes; PSLP2197)

Put focus on delivering the other two garden villages, which are nearer UDCs employment locations and main road network (A120)/allocate some smaller sites across the district that come forward quicker than garden villages/provide custom build plots St Edmunds Lane Management Limited (PSLP1809)

Policy SP7 to 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 (Transport for London PSLP2117)

Object to NUGC which will have an irreversibly negative impact on the landscape as well as resulting in significant congestion on the local highways network. The site scored poorly against a number of the Sustainability Appraisal Objectives identified in the Sustainability Appraisal, which suggests the site is not a sustainable location for new growth.

Key issues identified include the negative impact the development of the site could have on; water quality, the landscape, the areas heritage assets, the potential for contamination and poor bus links. The location of this new settlement in the north of the District close to Cambridge will arguably result in this scheme meeting the housing needs of Cambridge more than Uttlesford (The Crown Estate; PSLP2750).

All three of UDC's garden villages are at the top of the range examined by Lichfields in terms of housing numbers and far exceed 2,000 units. The Lichfields evidence suggests that the timescales for obtaining planning approval on a site of this size is likely to be in excess of four years. Therefore the

<p>timescales indicated by UDC in their Local Plan seem even more unlikely. Again this points towards why significantly more housing is required from additional allocated sites in the early part of the plan period. (Village Developments Takeley; PSLP2915)</p>
<p>Whilst principle of Garden Communities in addressing housing need is valid may not be effective given reliance on 60% modal shift (Grant and Bloor; PSLP2899)</p>
<p>Fulfils the housing needs of the Cambridge housing market rather than the West Essex and East Herts market (Trustee of N Streeter Will Trust; PSLP2867)</p>
<p>Landscape impact - the settlement is a apparently being designed to mitigate the impact on the Great Chesterford but it will be highly visible from South Cambridgeshire and from the opposite side of the environmentally sensitive Cam Valley (Looking from Strehall/Catmere End), even if building is mainly on the plateau. It will permanently destroy the uplands, the sky-line, good quality agricultural land and add to urbanisation of what is currently essentially a rural landscape which is acknowledged to have high sensitivity to change. Historically, settlements in this area have always been in the valley, not on hills either side. The proposals will offend the natural order of the Cam Valley, developed over millennia. The proposed settlement will destroy any of the current green belt between the suburbs of southern Cambridge and the rural villages of South Cambs/Uttlesford and will create a huge area of ribbon development stretching from Great Chesterford to Cambridge.(Clive Hopewell PSLP577)</p>
<p>This proposal builds on good agricultural land for no good reason. Second, this area depends on groundwater supplies which are replenished by rainwater percolating through permeable rocks. Thus, aquifer recharge areas should be protected from building in order to ensure sustainable water supplies. However well designed water recycling is on a site, building on aquifer recharge zones means that there is going to be an element of loss of recharge and a concomitant tendency to increase runoff and flooding (PSLP603 Dr S Trudgill)</p>
<p>SP8 – West of Braintree GC</p>
<ul style="list-style-type: none"> • Planning Inspector Clews, re Braintree DC plan Jan 2018 has stated that the SA fails to justify the choices made and that it has not been demonstrated that the chosen spatial strategy is the most appropriate one when considered against the reasonable alternatives, as the tests of soundness require. (Individuals) (PSLP3007 Stebbing Neighbourhood Plan Group) • Unclear why this option was chosen and how the alternatives compared (PSLP761 M Frost) (PSLP828 S Baugh) • It is arbitrary and does not adequately support the Spatial Strategy or the selection of sites and allocations. (PSLP1864 Edward Gittins) • SA fails to justify the choices made and that it has not been demonstrated that the chosen spatial strategy is the most appropriate one when considered against the reasonable alternatives. As the Regulation 19 SA has been undertaken by the same organisation as the North Essex Section 1 Plan and relies wholly upon the West of Braintree Garden Community to be extended into Uttlesford, it is clearly seriously flawed and unsound for the principal reasons and shortcomings identified by the Inspector. (PSLP902 Bloor Homes) • 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 within 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. “ (PSLP2674 Persimmon Homes)

- Serious misgivings about the content and evidence base underpinning the Sustainability Appraisal and 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. Critically, we consider that the SA is fatally flawed and needs to be recommissioned. It is totally inappropriate to explore options at the Regulation 19 stage instead of carefully assessing and evaluating them at the earlier Regulation 18 stages, when key decisions regarding the Plan's overall strategy were taken regarding the selection of alternatives. It is notable that the Uttlesford SA has been undertaken by the same author (Essex Place Services) as that prepared in respect of the Joint North Essex Strategic Plan. The Joint examination Inspector has already identified serious flaws regarding the rigour of the testing of alternatives, and suggested that a new SA be undertaken by a different entity. (PSLP2206 Stebbing PC)
- Having reviewed the Local Plan and the accompanying Sustainability Appraisal, it is not clear if, or how, the Council has considered issues relating to the airports operation or national aviation policy in respect of the Local Plan and the west of Braintree housing allocation. This assessment needs to be undertaken in detail before the plan should progress, in order that interested parties can review and comment accordingly. (PSLP1514 Manchester Airport Groups)
- The SA has considered two additional settlement alternatives when compared to the Regulation 18 SA. However the selection of these alternatives does not appear to have given consideration to whether a different number of settlements could better deliver the housing requirement. Instead they have considered the suitability of a different number of settlements to deliver two vastly different housing figures. It is not clear why a strategy that does not seek to meet the District's full housing need would be included as a realistic alternative, whereas a strategy that distributes the development required to meet the District's housing need differently would not be assessed as an alternative.
Consider that there might be a risk that the selection of the Garden Communities look pre-determined because the sustainability appraisal does not give weight to any criteria or draw conclusions about the most sustainable settlement overall. The R19 SA states that it does not draw overarching conclusions but presents relevant impacts to the LPA which are not quantifiable, and that it is not the principle evidence base documents on which site allocations and policy approaches should be selected. This is contrary to PPG. (PSLP2977 Welcome Trust)
- Quotes from West of Braintree Garden Communities Plan: Issues and Options Consultation (Regulation 18) Draft Sustainability Appraisal (SA): Scoping & Environmental Report – November 2017 Sustainability Appraisal / Strategic Environmental Assessment in relation to Utilities. (PSLP3 & 16 D McBride / PSLP1569/2119/2123 P Bloom)
- The following should be identified through the SA To address recreational disturbance / pressure impacts from development on coastal SPAs and SACs, contributions will be secured towards mitigation measures identified in the Essex wide Recreational Disturbance Avoidance and Mitigation Strategy (RAMs) which will be completed by the time the Local Plan is adopted. The development is within the likely zone of influence (ZoI) for potential air quality impacts, through increased traffic levels, to Epping Forest SSSI, SAC. The policy must recognise this and include a requirement for implementation of any measures identified as necessary, through the Epping Forest MoU study, to address air quality impacts to the SSSI/SAC. The policy should specify a funding mechanism for the delivery of the agreed measures and any measures required to address impacts to the nearby River Ter and Bovington Hall Woods SSIs. (PSLP2455 Natural England)
- Disagree with the SA's assessment of the garden communities against sustainability objectives including objective 4 in relation to historic environment. The SA concludes uncertain impacts when in our view it is clear that there would be major significant impacts from the development proposed. The SA plays down the potential impact and is therefore somewhat misleading. The sustainability appraisal appears to only consider the dwellings within the garden communities that are likely to come forward during the plan period. It would be helpful if the sustainability

<p>appraisal would also consider the full dwelling capacity of these proposed garden communities to assess the suitability (or otherwise) of the proposals in terms of the impact on the historic environment and other facets of sustainable development. (PSLP1855 Historic England)</p>
<p>SP9 – Development within Development Limits</p>
<p>None</p>
<p>SP10 – Protection of the Countryside</p>
<ul style="list-style-type: none"> The SA focuses on too much reliance on the 3 garden community sites. (Go Holdings Ltd PSLP 2704)
<p>SP11 – London Stansted Airport</p>
<p>None</p>
<p>SP12 – Sustainable Development Principles</p>
<p>None</p>
<p>4. Housing</p>
<p>Part 5.4.6 of the SA on Policy H6 does not justify why clusters of affordable housing units are restricted to such low numbers as set out in paragraph 4.23 of the Local Plan. (PSLP2562 Bovis Homes)</p>
<p>H1 to H12</p>
<p>Disagree with the comments and recommendations made in the SA for Policy H10. (PSLP738 Susan Johnson)</p>
<p>5. Employment, Appendix 5, 6</p>
<p>The Easton Park Development proposal of 10,000 new households is unsustainable because it is remote from the M11 junction 8, there is no local station, nor cycleway to it and the pedestrian routes to the nearest station are unsafe and actively discouraged by Manchester Airport Authority.</p> <p>History on this point is not good MAA will not permit the large waste and aggregate lorries, that do employ local people, to join Thremhall Avenue at Coopers End Roundabout. These lorries are forced to drive further, wait at the traffic lights at The Four Ashes junction and they currently power through the villages of Takeley, Takeley Street in order to join the M11 or head west.</p> <p>The Local Plan should address issues like this on behalf of local people. Further expansion of the airport and growth should be linked to resolving issues like this rather than compounding them with any increase in building...which will require aggregate to be delivered and all other construction materials purchased locally and travelling from the North of Takeley. Why build houses in a town format when there are no jobs, poor co-operation between the existing employers and a compulsion to encourage car use to the detriment of local people already living in the area.</p>

Small developments are needed scattered around the Uttlesford District and if multiple occupancy homes are to be built, there should be an assumption that they will be within easy walking distance of Great Chesterford, Wendens Ambo, Newport Elsenham and Stansted Mountfitchet Stations and the two accessible M11 junctions to the north and south of the District where the cycleway has been improved already; as part of a £800000 project, a one mile stretch was upgraded. (PSLP867)
5 Employment
EMP1
It is not clear from para 5.41 what level of employment is anticipated or planned for North Stansted Employment Area or how this has been allowed for within traffic forecasts, for example, through Elsenham, Stansted Mountfitchet and M11 J8. (PSLP920)
EMP2 – EMP4
None
6. Retail, Appendix 5
Introduction
None
RET1
<ul style="list-style-type: none"> • The question concerning the Sustainability Appraisal is no mentioned in the guidance notes, the web page and in the Plan; • Being unaware of the SA question, Elsenham Parish Council did not consider the SA when it met to determine the response to the Regulation 19 Local Plan. It is noted that the SA comprises 590 pages, in addition to Annexes A, B and C totalling 232 pages, and a Non-Technical Summary of 57 pages. • In the very limited time available, it has been possible to make only a cursory review of the Non-Technical Summary. The following comments are offered: <ul style="list-style-type: none"> ○ 1.2 Sections 36 to 43 inclusive of the Local Plan are not mentioned. ○ Table 1, Key Local Documents: <ul style="list-style-type: none"> a. The list of documents does not appear in the Local Plan consultation document, and thus the documents listed will not necessarily have been taken into account in responses. b. There is a need for absolute consistency in the naming of documents as they appear in the list and on the documents themselves. c. There is a need to include the web addresses where documents can be found, particularly those published by Uttlesford District Council. d. The list includes Housing Strategy 2012-15 (Uttlesford District Council, 2012). But Uttlesford District Council Housing Strategy 2016-21 is available and included as one of the documents which make up the Local Plan. e. The list includes Strategic Housing Market Assessment (2012 [new assessment commissioned expected 2015]). Clearly the note makes little sense in a document published in 2018. In fact, there is a more recent, but less detailed, SHMA dated 2017. <p>Due to lack of time and notice, the Parish Council is unable to comment further on the Sustainability</p>

Appraisal, but reserves the right to do so later if deemed appropriate. (Elsenham Parish Council PSLP 276)
RET2 to RET5
None
7. Transport
TA1 to TA4
None
8. Infrastructure
INF1 to INF4
None
9. Design
Introduction
None
D1
<ul style="list-style-type: none"> I did not know this question would appear. There has been no mention of the Sustainability Appraisal previously. It is not easy to find. The Guidance Notes don't help, and they don't say where it is either.(PSLP 384)
D2
<ul style="list-style-type: none"> The Sustainability Appraisal makes no meaningful comments or recommendations on the subject of car parking design.(PSLP 701)
<ul style="list-style-type: none"> The question concerning commenting on the Sustainability Appraisal is not included in the guidance notes, web page and the plan itself. Elsenham Parish did not therefore consider the SA question due to length of the SA document comprising 590 pages, in addition to Annexes A, B and C totalling 232 pages, and a Non-Technical Summary of 57 pages. Due to the very limited time available, only a cursory review of the Non-Technical Summary was undertaken. The following comments are offered: <ul style="list-style-type: none"> 1.2 Sections 36 to 43 inclusive of the Local Plan are not mentioned. Table 1, Key Local Documents: <ol style="list-style-type: none"> The list of documents does not appear in the Local Plan consultation document, and thus the documents listed will not necessarily have been taken into account in responses. There is a need for absolute consistency in the naming of documents as they appear in the list and on the documents themselves. There is a need to include the web addresses where documents can be found, particularly those published by Uttlesford District Council. The list includes Housing Strategy 2012-15 (Uttlesford District Council, 2012). But Uttlesford District Council Housing Strategy 2016-21 is available and included as

<p>one of the documents which make up the Local Plan.</p> <p>e. The list includes Strategic Housing Market Assessment (2012 [new assessment commissioned expected 2015]). Clearly the note makes little sense in a document published in 2018. In fact, there is a more recent, but less detailed, SHMA dated 2017.</p> <ul style="list-style-type: none"> • Due to lack of time and notice, the Parish Council is unable to comment further on the Sustainability Appraisal, but reserves the right to do so later if deemed appropriate. (Elsenham Parish Council PSLP 289)
D3 to D5
None
D6
<ul style="list-style-type: none"> • The question concerning commenting on the Sustainability Appraisal is not included in the guidance notes, web page and the plan itself. • Elsenham Parish did not therefore consider the SA question due to length of the SA document comprising 590 pages, in addition to Annexes A, B and C totalling 232 pages, and a Non-Technical Summary of 57 pages. • Due to the very limited time available, only a cursory review of the Non-Technical Summary was undertaken . The following comments are offered: • 1.2 Sections 36 to 43 inclusive of the Local Plan are not mentioned. • Table 1, Key Local Documents: <ul style="list-style-type: none"> f. The list of documents does not appear in the Local Plan consultation document, and thus the documents listed will not necessarily have been taken into account in responses. g. There is a need for absolute consistency in the naming of documents as they appear in the list and on the documents themselves. h. There is a need to include the web addresses where documents can be found, particularly those published by Uttlesford District Council. i. The list includes Housing Strategy 2012-15 (Uttlesford District Council, 2012). But Uttlesford District Council Housing Strategy 2016-21 is available and included as one of the documents which make up the Local Plan. j. The list includes Strategic Housing Market Assessment (2012 [new assessment commissioned expected 2015]). Clearly the note makes little sense in a document published in 2018. In fact, there is a more recent, but less detailed, SHMA dated 2017. • Due to lack of time and notice, the Parish Council is unable to comment further on the Sustainability Appraisal, but reserves the right to do so later if deemed appropriate. (Elsenham Parish Council PSLP 277)
D7
<ul style="list-style-type: none"> • The question concerning commenting on the Sustainability Appraisal is not included in the guidance notes, web page and the plan itself. • Elsenham Parish did not therefore consider the SA question due to length of the SA document comprising 590 pages, in addition to Annexes A, B and C totalling 232 pages, and a Non-Technical Summary of 57 pages. • Due to the very limited time available, only a cursory review of the Non-Technical Summary was undertaken . The following comments are offered: • 1.2 Sections 36 to 43 inclusive of the Local Plan are not mentioned. • Table 1, Key Local Documents:

<ul style="list-style-type: none"> a) The list of documents does not appear in the Local Plan consultation document, and thus the documents listed will not necessarily have been taken into account in responses. b) There is a need for absolute consistency in the naming of documents as they appear in the list and on the documents themselves. c) There is a need to include the web addresses where documents can be found, particularly those published by Uttlesford District Council. d) The list includes Housing Strategy 2012-15 (Uttlesford District Council, 2012). But Uttlesford District Council Housing Strategy 2016-21 is available and included as one of the documents which make up the Local Plan. e) The list includes Strategic Housing Market Assessment (2012 [new assessment commissioned expected 2015]). Clearly the note makes little sense in a document published in 2018. In fact, there is a more recent, but less detailed, SHMA dated 2017. <ul style="list-style-type: none"> • Due to lack of time and notice, the Parish Council is unable to comment further on the Sustainability Appraisal, but reserves the right to do so later if deemed appropriate. (Elsenham Parish Council PSLP 278)
<p>D8</p>
<ul style="list-style-type: none"> • The plan acknowledges that 'Climate change is a global issue which has the potential to have significant environmental, social and economic impact on the UK. However, the wording of policies is weak and inconsistent with government policy whose national target is zero. <ul style="list-style-type: none"> – The plan then continues in 9.26 to give itself 'let out clauses': 'In setting out these policies, the Council is mindful that that the Government's Planning Practice Guidance allows latitude for local plans to set local requirements for sustainability targets subject to normal conventions relating to viability.' – How is Viability defined? Viability for the developer within his current profit margins? Or viable for future generations in the years ahead over the lifetime of the development? Government guidance on viability states that: 'Plans should set out circumstances where review mechanisms may be appropriate, as well as clear process and terms of engagement regarding how and when viability will be reassessed over the lifetime of the development to ensure policy compliance and optimal public benefits through economic cycles. (PSLP 666)
<ul style="list-style-type: none"> • Policy D8 lacks commitment to energy reduction measures; • The plan does not take into consideration the massive reduction in the costs of energy efficiency measures which has been exponential. The same is true of other systems of air source heat pumps, energy reclamation from bath/shower water etc. As developers are led by planners to adopt this measure en masse, the prices will reduce accordingly. • The council should be showing the leadership needed to get us further into, and take advantage of, this virtuous economic circle. • To be sustainable, our assessment of affordability and viability should also extend over the lifetime of the development. There is no point saving money now, only for our children to be saddled with a massive bill in the years ahead. Yet this is what we repeatedly do. (PSLP 146)
<p>D9</p>
<ul style="list-style-type: none"> • D9 Minimising Carbon Emissions. This policy sounds worthwhile and sets out 4 clear requirements which are followed by the phrase 'These requirements will apply unless it can be demonstrated that they would make the development unviable.' I imagine that every developer will do his/her best to demonstrate that they are unviable in order to maximise profits. What protection is there in this plan against that? To be sound, the plan should set out a vision and expectations that will be robust enough to defend against developers who

are seeking to cut costs at the expense of sustainability - making future generations pay. (PSLP 146)
D10
None
10. Environment
EN1 to EN6
None
EN7
1. 2. Sustainability Appraisal The sustainability appraisals for this Local Plan has not taken into account, or properly addressed, overall declines in protected species (e.g. bat) populations, locally or (where nationally scarce) nationally
EN8 – EN9
None
EN10
The SA is difficult to interpret on the subject of surface water flooding and watercourses. (PSLP703)
EN11
<p>1.2 Sections 36 to 43 inclusive of the Local Plan are not mentioned.</p> <p>Table 1, Key Local Documents:</p> <p>a. The list of documents does not appear in the Local Plan consultation document, and thus the documents listed will not necessarily have been taken into account in responses.</p> <p>b. There is a need for absolute consistency in the naming of documents as they appear in the list and on the documents themselves.</p> <p>c. There is a need to include the web addresses where documents can be found, particularly those published by Uttlesford District Council.</p> <p>d. The list includes Housing Strategy 2012-15 (Uttlesford District Council, 2012). But Uttlesford District Council Housing Strategy 2016-21 is available and included as one of the documents which make up the Local Plan.</p> <p>e. The list includes Strategic Housing Market Assessment (2012 [new assessment commissioned expected 2015]). Clearly the note makes little sense in a document published in 2018. In fact, there is a more recent, but less detailed, SHMA dated 2017.</p> <p>In the circumstances of lack of time and notice, the Parish Council is unable to comment further on the Sustainability Appraisal, but reserves the right to do so later if deemed appropriate. (Elsenham</p>

Parish Council; PSLP337)
EN12 to EN14
None
EN15
<ul style="list-style-type: none"> The large number of houses suggested for the developments are due to the choice of the developer led solution. The majority of houses built will therefore be built for profit and will not be affordable for local people. This large number of dwellings will vastly increase traffic on local roads which will exacerbate air pollution. Therefore the proposed number of houses will not be sustainable in relation to the health and wellbeing of residents. (PSLP1523)
EN16 to EN18
None.
11. Countryside
Introduction
<ul style="list-style-type: none"> It is not sustainable to plonk thousands of houses down in the countryside when most of the people coming to live there will be racing through said former countryside to get somewhere else for their jobs.(PSLP 49)
C1 to C4
None
12-35. Site Allocations
<p>Elsenham</p> <ul style="list-style-type: none"> Disagree with the assessment made of sites reference ELS6-land west of Station Road and ELS7-land north of Stansted Road, Elsenham. (PSLP2761 Crown Estates) <p>Felsted</p> <ul style="list-style-type: none"> Concerned with soundness and compliance with SEA regulations. Distribution strategy is inconsistent with spatial vision of maintaining and enhancing the vitality and viability of towns and villages. There is a lack of assessment of land at Braintree Road and Land east of Chelmsford Road Felsted as reasonable alternatives. To dismiss the site because planning permission has been refused and an appeal dismissed should not be a factor in assessing suitability of a site which should be based on the evidence within the SA. (PSLP2873 Catesby) <p>Newport</p> <ul style="list-style-type: none"> Disagree with the assessment of site reference New11-Land to the south of Wicken Road, Newport. (PSLP2784 Countryside) <p>Stansted Mountfitchet</p> <ul style="list-style-type: none"> SA fails to justify the choices made and that it has not been demonstrated that the chosen

spatial strategy is the most appropriate one when considered against the reasonable alternatives. As the Regulation 19 SA has been undertaken by the same organisation as the North Essex Section 1 Plan and relies wholly upon the West of Braintree Garden Community to be extended into Uttlesford, it is clearly seriously flawed and unsound for the principal reasons and shortcomings identified by the Inspector. (PSLP903 Bloor Homes)
Thaxted
<ul style="list-style-type: none"> • The SA has not assessed land to the south of Sampford Road promoted through the Call for Sites, as an alternative development. (PSLP2779 Countryside Properties) • Disagree with the assessment made for reference THA4- Land east of Wedow Road (land off Cophall Lane). (PSLP2879 Linden Homes)
CLA 1 – GtDUN 3
None
GtDUN 4
<ul style="list-style-type: none"> • Fully support the conclusions of the SA in relation to this site subject to a number of clarifications. (PSLP2874 Lindon Homes)
• GtDUN 5 – THA 3
None
36. Delivery and Monitoring
None
M1 – M2
None
37. Glossary
None
38. Appendix 1 Replacement Policies
None
39. Appendix 2 Monitoring Framework
None
40. Appendix 3 Housing Trajectory
None
41. Appendix 4 Garden Community Principles
None

42. Appendix 5 Marketing Assessment Information
None
43. Appendix 6 Existing Employment Sites Schedule
None
44-115 Appendix 7 Inset Maps
None

This page is intentionally left blank

<u>Uttlesford District Council Regulation Regulation 19 Local Plan Summary of Representations for the Addendum of Focussed Changes of the Regulation 19 Local Plan</u>	
FOCUSSED CHANGE 1	Summary of Responses
SUPPORT	1
OBJECT	15
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • North Essex Garden Communities Ltd (NEGC Ltd) was established to deliver the Garden Community proposals contained in the shared strategic Section 1 of the Braintree District Council, Colchester Borough Council, and Tendring District Council Local Plans which includes the proposal for the West of Braintree Garden Community. The company is wholly and equally owned by the aforementioned three district authorities as well as Essex County Council. In response to the consultation NEGC Ltd objects to Focussed Changes 1-6, and Focussed Change 9 of the Addendum of Focussed Changes to the Uttlesford District Council Local Plan (Reg 19) on the grounds that the changes are not necessary to make the plan effective and are therefore unjustified. Â NEGC Ltd considers the West of Braintree Garden Community as being fully achievable and presenting no elevated risks to delivery as is stated in the Focussed Changes. In order to elucidate these grounds for objection NEGC Ltd would like to be afforded the opportunity to submit evidence for consideration at the Examination, as well as provided with the opportunity to appear at the relevant Examination hearing sessions. (Colchester Borough Council; PSLPA157) • Focussed change 1 represents a sound approach providing greater clarity and certainty about the sources of supply of housing proposed within Uttlesford District, for the Plan period to 2033 through Policy SP3 (The Scale and Distribution of Housing). 'Focussed change 1 confirms, through more prescriptive wording, that 11 settlement locations including three Garden Communities shall deliver some 6,380 of the planned 14,600 dwellings for the Local Plan period 2011 to 2033. Both the Easton Park and North Uttlesford Garden Communities are identified by policy SP3 as delivering the greatest number of dwellings by 2033 (1,925 at each Garden Community). The next largest settlement locations contribute towards delivery of 14,600 dwellings are the West of Braintree Garden Community and Great Dunmow for 970 and 767 dwellings respectively. There is an element of risk that non delivery of any or a number of the dwellings at any of the locations listed by policy SP3 will prevent the total housing requirement of 14,600 dwellings being delivered within Uttlesford within the Plan period to 2033. The event of non- delivery or delayed delivery of housing at any of the three planned Garden Communities would provide the greatest potential impact to the Authority meeting the 14,600 dwelling target by 2033. (GL Hearn; PSLPA229)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • These elevated risks however fundamentally undermine the purpose of the strategic policy and the proposed wording highlights concerns raised in the Reg 19 Representations on the

	<p>timescales for delivering the garden communities. Changing the wording effectively recognises that there is not certainty over housing delivery and presents an unacceptable loosening of the councils commitment to delivery. (Iceni Projects; PSLPA 32)</p> <ul style="list-style-type: none">• The wording implies that development will come forward with a degree of certainty. That is what a sound Local Plan should achieve, if it is to be positively prepared. The amended wording i.e. "The plan is to deliver" is markedly weaker in this respect. It is fair to plan for growth but it is essential to achieve that growth. (PSLPA 117; Pegasus Planning Group)• There is a significant risk that the proposed new settlement known as the West of Braintree Garden Community (WoB GC) will not deliver new homes within Uttlesford in the plan period. It is not considered that the commitment to an early Local Plan Review is appropriate to address what are reasonable concerns regarding the deliverability of this site within Uttlesford in the plan period. With reference to the NEAs Inspector's letter of 8th June 2018, the concerns are of sufficient gravity that they cannot simply be dismissed by insertion of a commitment to an early review, if they are sufficient to warrant the NEAs Inspector concluding that they would render those Plans unsound, then the Uttlesford element of the WoB GC should be deleted from the emerging Uttlesford Local Plan until those concerns are resolved, and additional sites should be identified in the emerging Uttlesford Local Plan. (Countryside Properties LTD; PSLPA164)• Housing Trajectory and 5 Year Housing Land Supply Statement (October 2018) The District Council has published an updated Housing Trajectory and 5 Year Housing Land Supply Statement (October 2018), albeit this was not included as part of the Regulation 19 Local Plan Addendum suite of documents the subject of the current consultation. This document comprises a revised trajectory and an update on Uttlesford's 5 year housing land supply, which includes an assessment of supply following the anticipated adoption of the emerging Local Plan. This Trajectory continues to suggest that the Uttlesford element of the WoB GC will start delivering new homes by 2025/26, delivering a total of 970 new homes in the plan period. Given our comments above, this is a completely unreasonable and unevicenced position to adopt. As noted above, that part of the WoB GC within Uttlesford is wholly dependent upon key items of infrastructure coming forward within Braintree District first, attention, is drawn to the comments by Braintree District Council on the Regulation 18 draft of the emerging Uttlesford Local Plan, such 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. (Countryside Properties LTD; PSLPA 164)• Constant reference to "the plan" and "sustainability" will not ensure that the Councils intentions now will be met in the future. Increased pollution affecting children on the way to school. Increased road deliveries (as above) this includes local chemists
--	---

	<p>losing their NHS contacts (more deliveries) putting more pressure on GPs. (PSLPA203)</p> <ul style="list-style-type: none"> • 2a. Reserve sites to cater for the non <ul style="list-style-type: none"> 2b. delivery of the West of Braintree Garden Community GC Should be included for 2c. Not considered effectively as impact of non-delivery or lateness of Garden Communities not catered for 2d. No reference to NPPF July 2018. (Go Holdings; PSLPA165) • The proposed changes set out in Focused Changes 1 and 2 not address the concerns raised previously and given that Uttlesford District Council has acknowledged that there is an elevated risk around the delivery of the West of Braintree Garden Community (Pegasi Management LTD; PSPLA199) • Over Dependency on Garden Communities and over-ambitious expectations with regards to timing and delivery (Bloor Homes; PSLPA192) • Officers have obtained legal advice that says the updated SA should be published for representations but the Local Plan does not need to be published alongside it unless the updated SA points to conclusions which suggest that the Local Plan is not the most appropriate strategy to deliver its objectives, in the light of a comparative assessment with reasonable alternatives. Given the number of “significant concerns and potential areas of risk in terms of legal challenge” identified by AECOM we submit that the Council should go further than highlighting an “elevated risk” in respect of the delivery of WoBGC and instead remove the allocation from the emerging Plan. It should be replaced now by alternative sites. We submit that the latest work on the SA is the right time to reconsider the three new communities and whether reasonable alternatives including extensions to villages and market towns have a greater role to play. (Bloor Homes; PSLPA 192) • In order to ensure that this Policy meets the three tests of soundness, the Council should undertake additional evidence base work to demonstrate that their emerging Local Plan will deliver the housing need set out in their spatial strategy. 2.2. The current evidence base is not considered sufficiently robust to demonstrate the deliverability of the proposed garden communities within Focussed Change 1, SP3. To ensure that this Policy, and the emerging Plan as a whole, meets the three tests of soundness, the housing proposed to be delivered through the garden communities should be omitted from the proposed housing trajectory, not least until further evidence base work is undertaken. Doc No: IMS-F-15 Revision: 1 Date: 01.05.2018 Page: Page 2 of 10 2.3. This would result in a deficit of 4820 dwellings, including 970 dwellings proposed to be delivered within the West of Braintree Garden Community. Additional sites should be allocated in the short to medium term in order to meet the identified housing need. This would remove the uncertainty around the deliverability of their spatial strategy. The garden communities could come forward in future reviews of the Local Plan, once deliverability is confirmed with robust evidence. (Bovis
--	---

	Homes; PSLPA 206)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Amend the stepped trajectory approach included in Policy SP3 so the housing requirement is evenly distributed throughout the Local Plan period, which will ensure objectively assessed needs in the District are met “ further sites will need to be identified as a result; • Apply the Sedgefield approach to address shortfalls in housing in the first five years of the plan as there is already an over-reliance on housing delivery in the later part of the plan period; • Reduce reliance on housing allocations during the Plan period coming from the proposed Garden Communities due to the intrinsic deliverability issues with garden community development associated with infrastructure requirements and lead-in times and allocate further sites to meet housing needs; • Update the assumptions relating to the delivery rates of the Garden Communities based on robust evidence and amend the housing trajectory accordingly; • Increase housing allocations from small to medium-sized sites in the emerging Local Plan to ensure delivery in the short-medium term is able to meet the Local Plan housing requirements, offset the reliance on the Garden Communities, as well as pick up any backlog which has been experienced in recent years. This is especially important give that a recent Appeal Decision in the District has identified that all parties agree that the Council cannot currently demonstrate an adequate five-year housing land supply; (Iceni Projects; PSLPA96) • Whilst Focussed Changes 1 and 3 are relatively minor, the only way they can properly be addressed is through the more significant changes to the Plan and its strategy as discussed in our response to Focussed Change 2. (Bloor Homes; PSLPA127) • The OAN should be increased to reflect an accurate assessment of UDC’s housing need; The Housing Trajectory is amended to reflect realistic delivery times; The Council should ensure a rolling five year supply of homes across the plan period and apply the Sedgefield methodology to meet backlog; and Additional sites in existing sustainable settlements should be allocated to provide required flexibility in the event West of Braintree or other sites in the Plan are delayed or do not come forward at all. (Countryside Properties; PSLPA164)

<u>Uttlesford District Council Regulation Regulation 19 Local Plan Summary of Representations for the Addendum of Focussed Changes of the Regulation 19 Local Plan</u>	
FOCUSSED CHANGE 2	Summary of Responses
SUPPORT	4
OBJECT	40
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • “Chelmsford City Councils response to Uttlesford District Council Focused Changes to Regulation 19 Local Plan Chelmsford City Council (CCC) welcomes the opportunity to comment on the focused changes to Uttlesford District Council (UDC) Regulation 19 Local Plan. CCC responded to the Regulation 19 Local Plan consultation and as such the comments to this focused review are based solely on the changes highlights in the consultation document and do not reiterate comments made to the Regulation 19 consultation. CCC notes the reasons for the focused changes and of interest to Chelmsford is the amendments regarding West of Braintree Garden Community and the timing for the delivery of the proposal following the Inspectors Report to the North Essex Authorities (NEA) Local Plans. The Local Plan stated that the West of Braintree Garden Community will deliver a minimum of 970 homes to the housing supply of Uttlesford District by 2033. CCC noted in its previous representation to the Regulation 19 Plan, the conclusion of the Inspector’s Report into the North Essex Authorities Strategic (Section 1) Plan, that further work is needed, and raised questions related to the deliverability of this specific allocation. Focused Changes 2 to 6 deal with the changes to the Plan to reflect the elevated risk around the delivery at West of Braintree GC. CCC supports these changes and notes the commitment to an early review should the delivery to the West of Braintree restrict the Councils ability to meet the housing requirement within Policy SP3 and Policy SP5. Focused change 6 to Policy SP8 “West of Braintree Community provides additional wording in relation to the land within Uttlesford for the Garden Community not being deliverable on its own without the land in Braintree District Council’s area. This is noted as the garden community straddles the District boundary with Braintree District Council and should come forward as a comprehensive package to ensure all supporting infrastructure is delivered. CCC has no further comments to make on the additional changes. CCC continues to be supportive of the approach taken in the Local Plan and do not raise any objections under soundness or legal compliance”. (Chelmsford City Council; PSLPA46) • Focused Change 2 in SP3 is strongly supported by Braintree District Council. The authority appreciates that there is an elevated risk level around the delivery of the Garden Community at West of Braintree and particularly around the timing of the decision making on the North Essex Authorities strategic section 1 Plan which also creates a level of uncertainty for the UDC examination. BDC can confirm that it has recently written to the Planning Inspector confirming that it wishes to proceed with the section 1 examination and is currently gathering further evidence base and

	<p>seeking comments on a method scoping statement for a revised Sustainability Appraisal. It is anticipated that this work will be completed early in 2019. Whilst the Council cannot prejudge the outcome of the further evidence base and Sustainability Appraisal, the evidence gathered so far continues to show a garden community at West of Braintree as a viable and deliverable option for long term growth. (Braintree District Council; PSLPA57)</p> <ul style="list-style-type: none"> • The NEAs section 1 Local Plans has requested further evidence base information relating to the West of Braintree Garden Community, the Colchester Braintree Borders Garden Community and the Colchester Tendring Borders Garden Community. The Inspector has not raised any heightened level of risk relating to delivery of the West of Braintree Garden Community above or beyond any risks associated with either the Colchester Braintree Borders, or the Colchester Tendring Borders Garden Communities. The NEAs remain firmly committed to the three North Essex Garden Communities, and have written to the Inspector to confirm that the requested additional evidence base will be provided and with a view to the examination continuing in early 2019. The further evidence base prepared to date by the NEAs continues to show the West of Braintree Garden Community being viable and deliverable. This is also demonstrated through the site specific evidence base prepared by GL Hearn on behalf of ANSC and submitted towards the UDC reg. 19 Local Plan. (GL Hearn PSLPA230) • We welcome the additional text which seeks to reflect the elevated risk around the delivery at West of Braintree. (Historic England; PSLPA329)
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • If, as noted, the examination into the North Essex Authorities Local Plans has identified an elevated level of risk around the delivery of the West of Braintree Garden Community then the council should plan positively as part of this Plan to address such a risk. The council should allocate additional sites, such as that off Beldams Lane, Bishop's Stortford, to ensure that the current proposed plan is sufficiently flexible to respond to the identified risk at West Braintree and effective in delivering the required housing without relying on an early review of the plan to address an already anticipated shortfall in supply. The reliance on an early review of the plan will take time and further frustrate delivery. If there is sufficient uncertainty to include Focussed Change 2 then there is sufficient justification now to allocate additional sites to address any potential shortfall and ensure the effectiveness of the Local Plan. (Planserv; PSLPA5) • The proposed change amends the wording of Policy SP3 to state that in the event that the West of Braintree garden community does not come forward as currently proposed the Council would undertake a Local Plan review. Anglian Water understands that the North Essex Authorities are intending to undertake further technical work relating to the garden communities in the North Essex Local Plan including West of Braintree (letter dated 19 th October 2018). With a further Local Plan consultation to be

	<p>undertaken in 2019 (to close March 2019). The examination is proposed to be suspended by the North Essex Authorities until February 2019 to allow for this which would delay the adoption of the North Essex Part 1 Local Plan. As drafted the wording of Policy is not explicit about the circumstances in which a Local Plan Review would be triggered and what criteria would be used. (Anglia Water; PSLPA2)</p> <ul style="list-style-type: none"> • As set out in our representations to the Regulation 19 consultation, more small-scale, deliverable sites should be allocated to account for the potential non-delivery / delay of this site (and other garden settlements) to enable sufficient flexibility in the development strategy and ensure that sufficient houses are delivered within the plan period. The NPPF has been amended to increase the importance of delivery and that should be reflected in this plan. The Uttlesford Local Plan, as drafted, will not deliver the number of homes needed and so the authority will continue to struggle to demonstrate a 5 year housing land supply for the duration of the plan. (Linden Homes; PSLPA10) • UDC state that WoB will only be included in its Local Plan if BDC adopt it in their Local Plan. However, the Government Planning Inspector who examined the BDC Local Plan and the Garden Communities proposals was very clear in his letter of 8th June that WoB is unviable, unjustifiable and unsustainable. The fact that BDC and the NEA are ignoring this advice from the Government Planning Inspector and pushing ahead with the less satisfactory Option 2, rather than Option 1 which the Inspector made clear was his favoured option, and spending even more public money on this vanity project, does not mean that UDC should do the same. We welcome the fact that UDC are taking note of the Government Inspector's concerns and hope that, in fact, they give them more credence than BDC seem to be doing. (PLSPA28) • Currently, WoBGC is expected to contribute to housing supply in this period. This contribution should be moved later in the Plan period, no earlier than year 11, and additional sites should be allocated to make up the shortfall. Wider Implications of the NEA Inspector's Findings As outlined in our original regulation 19 representations, the conclusions reached by the NEA Inspector have implications that stretch beyond WoBGC. I do not propose to repeat these concerns here, suffice to say they are not addressed by the focused changes. Â Review Policy Wording The review policy wording must satisfy paragraph 154 of the 2012 NPPF, namely it must provide a clear indication as to how to proceed. The proposed policy wording in SP3 sets the trigger for an early review as a restriction of the Council's ability to meet the housing requirement. It is not at all clear what circumstances this would cover and, consequently, at what point the Council would consider that their ability to meet the housing requirement would be restricted. The policy should be drafted such that the trigger point for review is unambiguous and precise, potentially with reference to the need for any sites included within the 5 year housing land supply to meet the definition of deliverability set out in national
--	---

	<p>policy. (Sworders; PSLPS26)</p> <ul style="list-style-type: none"> • We strongly object to the current wording of the Local Plan which seeks to resolve this issue by committing to a Local Plan Review. There is no detail in the policy as to how this Review would be triggered and no commitment as to timescales. The only reference to a trigger mechanism is in circumstances where risks associated with delivery of the West of Braintree site cannot be resolved and where the council cannot meet its housing requirement. Â This creates an uncertain and reactionary approach to planning future housing growth in the District. By the time the need for a Local Plan Review is identified, undertaken, and further sites allocated, the shortfall in housing delivery could have significantly worsened. The Local Plan at present therefore is not effective nor justified, as it not deliverable over the plan period and, due to this, it cannot be considered the most appropriate strategy for housing growth (paragraph 182 of the NPPF).(Iceni Projects; PLSPA33) • There is currently a significant degree of risk to the housing requirement being delivered and, therefore, a reasonable and more effective alternative would be to ensure that the housing requirement would be met with definitive allocations where there is very limited risk to delivery. By way of an example, an extension to the east of Newport, with approximately 150-200 units would be a reasonable alternative which is sustainable and deliverable. Â At the very least, UDC should seek to identify reserved sites which could be brought forward should the WBGC not be delivered or there is a significant delay with the delivery of the other garden communities. (Paragraph 14 of the NPPF states that Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change.) This should mean to have a deliverable set of sites now, rather than to await a review where there is a significant risk of a large site not coming forward within the Plan period (Taylor Wimpey; PSLPA75) • The reliance on the delivery of homes in the new Garden Communities represents an extremely high risk strategy (which is now acknowledged by the Council in relation to the delivery of the West Braintree Garden Village), given the higher infrastructure costs associated with new settlements. The dependence on new settlements poses a risk that these sites will not be deliverable or will not meet the timelines due to challenges of providing extensive infrastructure. The Draft Local Plan proposes to place significant reliance on the delivery of three new Garden Communities to meet housing needs for the district. (Pegasi Management; PSLPA201) • Notwithstanding the lack of evidence base, it is clear that there is a key emphasis from Uttlesford District on submitting the emerging Local Plan to the Secretary of State in advance of January 24th 2019, to ensure that the policies in the previous Framework will apply for the purpose of examining plans (NPPF para. 214). As a result, Uttlesford District would not be required to adopt the Government's Standardised OAN Methodology. 3.9. This focus on proceeding to submit the emerging Local Plan despite not having a
--	--

	<p>robust evidence base to justify the deliverability of West of Braintree, is not an approach that is consistent with National Planning Policy. Paragraph 17 of the NPPF states that Local Authorities should ensure that their Local Plans should be proactively driven and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. 3.10. The inclusion of West of Braintree Garden Community within the Council’s emerging housing trajectory results in a risk that the District’s housing need might not be met in full during the emerging Local Plan period. As such, the emerging Local Plan cannot be considered as appropriately complying with National Planning Policy, which states that Local Plans should meet the full, objectively assessed needs for market and affordable housing in the housing market area. 3.11. Every effort should be made at this point to identify sufficient and deliverable sites to come forward. The Local Plan should therefore identify additional sites to come forward in the short term, and build in potential for reserve sites given that the OAHN is likely to increase in the next local plan and the uncertainty in respect of the deliverability of WoB GC. 3.12. These issues also reinforce our concerns with the proposed stepped trajectory, as we have raised in previous representations. Whilst it is appreciated that, in accordance with the Planning Practice Guidance, a stepped housing trajectory can be acceptable in certain cases, in respect of Uttlesford District, there is uncertainty that the strategic sites will come forward as anticipated, therefore rendering this stepped approach as unacceptable in this instance. (Boyer Planning / Bovis Homes; PSLPA207)</p> <ul style="list-style-type: none"> • As Easton Park GC relies on the rapid transit system, it is logical to conclude that delivery of this development would also be delayed for the same reasons as the Inspector has suspended the NEA’s examination. As a result, the Council will be unable to demonstrate a 5-year supply of housing land in the early years of the Plan and will need to allocate significant additional numbers of dwellings on sites that can be delivered quickly. This is exacerbated by the fact that the Council is already relying on a stepped trajectory. Given the scale and complexity of developing Garden Communities, 5 years is an extremely short time period to achieve occupation. Therefore a review of the LP would inevitably immediately follow adoption. (Pegasus Planning; PLSPA191) • North Essex Garden Communities Ltd (NEGC Ltd) was established to deliver the Garden Community proposals contained in the shared strategic Section 1 of the Braintree District Council, Colchester Borough Council, and Tendring District Council Local Plans which includes the proposal for the West of Braintree Garden Community. The company is wholly and equally owned by the aforementioned three district authorities as well as Essex County Council. In response to the consultation NEGC Ltd objects to Focussed Changes 1-6, and Focussed Change 9 of the Addendum of Focussed Changes to the Uttlesford District Council
--	--

	<p>Local Plan (Reg 19) on the grounds that the changes are not necessary to make the plan effective and are therefore unjustified. Â NEGC Ltd considers the West of Braintree Garden Community as being fully achievable and presenting no elevated risks to delivery as is stated in the Focussed Changes. In order to elucidate these grounds for objection NEGC Ltd would like to be afforded the opportunity to submit evidence for consideration at the Examination, as well as provided with the opportunity to appear at the relevant Examination hearing sessions. (Colchester City Council; PSLPA174)</p> <ul style="list-style-type: none"> • Galliard does not believe there is an elevated level risk around the delivery of the West of Braintree Garden Community. A plan will be prepared to demonstrate how an initial stage of development can be delivered in the short term that is consistent with the ambitions of the Uttlesford Local Plan and addresses the issues raised by the Inspector after the Examination into the North Essex Strategic Plan. Both Uttlesford and Braintree Councils support the location of West of Braintree as strategic and sustainable. There is a danger that public sector resources are distracted in seeking to work up a complex Local Delivery Vehicle (LDV) which threatens to delay the bringing forward of early phases of the proposed settlement. Galliard is confident that it can work with local stakeholders to bring forward an early phase of development that need not prejudice a future LDV but demonstrates the ability to deliver quality homes consistent with garden community principles. The Plan will not be for an isolated development but for a first phase of the ultimate 10,000 home new community that will be developed on both sides of the Uttlesford/Braintree border. The Plan will demonstrate how the infrastructure to support the first phase will be delivered in advance or alongside the new homes. It will also explain how agreements can be put in place for infrastructure to serve the wider community as it evolves, and to secure the creation of a new place of the highest quality that will reflect garden community principles (TCPA).(WYG Galliard Homes; PSLP174)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Policy SP 3 should be amended by the deletion of any reference to West of Braintree from the policy, and replacement housing provision identified for the 970 dwellings previously proposed for delivery within the Plan period (Stebbing Parish Council; PSLPA79) • It is considered that there is a need to clarify the circumstances in which a Local Plan Review would be undertaken and the focus of any review. Local Plans in the region are used to inform infrastructure investment decisions made by Anglian Water therefore it would be helpful if the proposed wording relating to the Local Plan Review is clarified. For example it is assumed that this would include the identification of additional housing allocation sites if required. (Anglian Water; PSLPA2)

<u>Uttlesford District Council Regulation Regulation 19 Local Plan Summary of Representations for the Addendum of Focussed Changes of the Regulation 19 Local Plan</u>	
FOCUSSED CHANGE 3	Summary of Responses
SUPPORT	1
OBJECT	24
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Chelmsford City Council’s response to Uttlesford District Council Focused Changes to Regulation 19 Local Plan Chelmsford City Council (CCC) welcomes the opportunity to comment on the focused changes to Uttlesford District Council (UDC) Regulation 19 Local Plan. CCC responded to the Regulation 19 Local Plan consultation and as such the comments to this focused review are based solely on the changes highlights in the consultation document and do not reiterate comments made to the Regulation 19 consultation. CCC notes the reasons for the focused changes and of interest to Chelmsford is the amendments regarding West of Braintree Garden Community and the timing for the delivery of the proposal following the Inspectors Report to the North Essex Authorities (NEA) Local Plans. The Local Plan stated that the West of Braintree Garden Community will deliver a minimum of 970 homes to the housing supply of Uttlesford District by 2033. CCC noted in its previous representation to the Regulation 19 Plan, the conclusion of the Inspector’s Report into the North Essex Authorities Strategic (Section 1) Plan, that further work is needed, and raised questions related to the deliverability of this specific allocation. Focused Changes 2 to 6 deal with the changes to the Plan to reflect the elevated risk around the delivery at West of Braintree GC. CCC supports these changes and notes the commitment to an early review should the delivery to the West of Braintree restrict the Council’s ability to meet the housing requirement within Policy SP3 and Policy SP5. Focused change 6 to Policy SP8 “West of Braintree Community provides additional wording in relation to the land within Uttlesford for the Garden Community not being deliverable on its own without the land in Braintree District Council’s area. This is noted as the garden community straddles the District boundary with Braintree District Council and should come forward as a comprehensive package to ensure all supporting infrastructure is delivered. CCC has no further comments to make on the additional changes. CCC continues to be supportive of the approach taken in the Local Plan and do not raise any objections under soundness or legal compliance. (Chelmsford City Council; PSLPA37) • North Essex Garden Communities Ltd (NEGC Ltd) was established to deliver the Garden Community proposals contained in the shared strategic Section 1 of the Braintree District Council, Colchester Borough Council, and Tendring District Council Local Plans which includes the proposal for the West of Braintree Garden Community. The company is wholly and equally owned by the aforementioned three district authorities as well as Essex County Council. In response to the consultation NEGC Ltd objects to Focussed Changes 1-6, and Focussed Change 9 of the

	<p>Addendum of Focussed Changes to the Uttlesford District Council Local Plan (Reg 19) on the grounds that the changes are not necessary to make the plan effective and are therefore unjustified. NEGC Ltd considers the West of Braintree Garden Community as being fully achievable and presenting no elevated risks to delivery as is stated in the Focussed Changes. In order to elucidate these grounds for objection NEGC Ltd would like to be afforded the opportunity to submit evidence for consideration at the Examination, as well as provided with the opportunity to appear at the relevant Examination hearing sessions. (Colchester City Council; PSLPA159)</p>
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • Alongside Focused Change 4, this change seeks to amend the wording of a key policy relating to delivery of the Garden Communities (Policy SP5). The recognition around the elevated risks to delivery of the West of Braintree Garden Community is supported. These elevated risks however fundamentally undermine the purpose of the strategic policy and the proposed wording highlights concerns we raised in the Regulation 19 Representations on the timescales for delivering the Garden Communities. Please read our response to Focussed Change 4 for further detail. (Iceni Projects; PSLPA34) • These amendments are considered not positively prepared. Ostensibly, the text amendments within these Focussed Changes is limited in scope however these reflect the fact that the more substantive changes within Focussed Change 2 weakens the policy provision somewhat. The original policy wording can be considered definitive, (i.e. Provision will be made and garden communities will be delivered) [our emphasis added]. The wording implies that development will come forward with a degree of certainty. That is what a sound Local Plan should achieve, if it is to be positively prepared. The amended wording i.e. "The plan is to delivered" is markedly weaker in this respect. It is fair to plan for growth but it is essential to achieve that growth. This is particularly the case in the context of the new Framework; provisions such as the Housing Delivery Test (which take effect irrespective of whether the Local Plan has been submitted under transitional arrangements) place a great deal of emphasis on the delivery of new homes, infrastructure and development. (Pegasus Planning; PSLPA118) • Without a good public transport link to enable West of Braintree residents to travel to employment in Saffron Walden or Stansted Airport and no local station for rail commuters to London, Cambridge, Colchester, Harlow or Chelmsford, almost all journeys would need to be made by car. This conflicts with national planning policy and will bring significant congestion to the A120 junction, M11 junction and the local road network. However, the Inspector has stated that the Garden Communities could not be developed in full without additional strategic road capacity and the timing for delivery of such strategic infrastructure improvements is unknown. Because of the high level of uncertainty over the future of West of Braintree GC, CPRE welcomes the cautious nature of

	<p>the proposed changes to the wording of the policies relating to the GC. However, since the Braintree element fails on Viability, Deliverability, Sustainability and Transport all the same reasons apply for the UDC element and CPRE has to ask the question: in such circumstances, can UDC actually proceed with the proposed West of Braintree Garden Community? (CPREssex; PSLPA103)</p> <ul style="list-style-type: none"> • In light of the “elevated risk” that the West of Braintree Garden Community will either not prove deliverable or otherwise not prove deliverable within the Plan period, we do not consider the reference to this Garden Community to be justified and should be deleted from the Local Plan. (Edward Gittins & Associates; PSLPA132)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Whilst Focussed Changes 1 and 3 are relatively minor, the only way they can properly be addressed is through the more significant changes to the Plan and its strategy as discussed in our response to Focussed Change 2. It is recognised by the Council that there are significant risks associated with the Garden Communities strategy. Endurance Estates considers that additional allocations are made in sustainable settlements (such as Takeley, with good access to employment, services and transport) including sites which are readily deliverable such as land at Parsonage Road. Such sites can come forward promptly and reliably, meaning the Plan will be less dependent upon the delivery of the Garden Communities at an early stage of the Plan period. The Housing Trajectory will therefore be better placed to demonstrate a rolling five year supply of housing, and to respond to any delays to the delivery of the Garden Communities. (PSLPA256; Endurance Estates Takeley) • As regards to the west of Braintree garden village the Local Plan should positively plan for growth. Would it not be more logical to plan reserve sites during the current Local Plan process. This would ensure no further delays which otherwise result from the review process suggested. (PSLPA147; Go Holdings)

<u>Uttlesford District Council Regulation Regulation 19 Local Plan Summary of Representations for the Addendum of Focussed Changes of the Regulation 19 Local Plan</u>	
FOCUSSED CHANGE 4	Summary of Responses
SUPPORT	4
OBJECT	26
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • ECC supports reference to a “Quality and Collaboration Partnership” but suggest the term is explained in the Local Plan so it is clear to all what this means and how this will positively influence delivery. (Essex County Council; PSLPA39) • Chelmsford City Council’s response to Uttlesford District Council Focused Changes to Regulation 19 Local Plan Chelmsford City Council (CCC) welcomes the opportunity to comment on the focused changes to Uttlesford District Council (UDC) Regulation 19 Local Plan. CCC responded to the Regulation 19 Local Plan consultation and as such the comments to this focused review are based solely on the changes highlights in the consultation document and do not reiterate comments made to the Regulation 19 consultation. CCC notes the reasons for the focused changes and of interest to Chelmsford is the amendments regarding West of Braintree Garden Community and the timing for the delivery of the proposal following the Inspectors Report to the North Essex Authorities (NEA) Local Plans. The Local Plan stated that the West of Braintree Garden Community will deliver a minimum of 970 homes to the housing supply of Uttlesford District by 2033. CCC noted in its previous representation to the Regulation 19 Plan, the conclusion of the Inspector’s Report into the North Essex Authorities Strategic (Section 1) Plan, that further work is needed, and raised questions related to the deliverability of this specific allocation. Focused Changes 2 to 6 deal with the changes to the Plan to reflect the elevated risk around the delivery at West of Braintree GC. CCC supports these changes and notes the commitment to an early review should the delivery to the West of Braintree restrict the Council’s ability to meet the housing requirement within Policy SP3 and Policy SP5. Focused change 6 to Policy SP8 “West of Braintree Community provides additional wording in relation to the land within Uttlesford for the Garden Community not being deliverable on its own without the land in Braintree District Council’s area. This is noted as the garden community straddles the District boundary with Braintree District Council and should come forward as a comprehensive package to ensure all supporting infrastructure is delivered. CCC has no further comments to make on the additional changes. CCC continues to be supportive of the approach taken in the Local Plan and do not raise any objections under soundness or legal compliance. (Chelmsford City Council; PSLPA28) • There are three changes to this final paragraph within the policy on Garden Community principles. All three changes are noted and supported by Braintree District Council. There are no further comments in relation to the first change. We note the purpose of the second change in recognition of the elevated risks with the

	<p>West of Braintree Garden Community and particularly support the recognition within that change that the development here will be part of a wider garden community. We also strongly support the third change which will help to ensure that garden community principles are delivered on any site which is privately developed as well as those which may be developed through a locally led development corporation model any site which is privately developed as well as those which may be developed through a locally led development corporation model. (Braintree District Council; PSLPA58)</p> <ul style="list-style-type: none">• ANSC supports the focussed change: Nevertheless, it is understood that Uttlesford District Council is confident that the proposed new West of Braintree Garden Community can be delivered (GL Hearn; PSLPA231)• These representations have been prepared by Bidwells on behalf of Grosvenor Britain & Ireland (Grosvenor) to the Addendum of Focussed Changes to Uttlesford District Council's (UDC) Regulation 19 Pre-Submission Local Plan (hereby referred to as the "Local Plan"). Grosvenor has been appointed by a consortium of landowners who control the vast majority of the land which is proposed to be allocated in the Local Plan as North Uttlesford Garden Community (NUGC). NUGC is to be allocated as one of three new garden communities in the Local Plan through draft Policy SP7. <p>These representations should be read alongside those submitted by Bidwells on behalf of Grosvenor to the Regulation 19 Pre-Submission Local Plan consultation which closed on 13 August 2018. We acknowledge that representations to this consultation must solely relate to new information contained in the addendum or newly published evidence base. As such, these representations are made in relation to Box FC 4 Focussed Change 4, which introduces additional wording to the final paragraph of Policy SP5 Garden Community Principles. The proposed change is set out below:</p> <p>The Council is confident that the new garden communities at Easton Park and North Uttlesford can be delivered. Notwithstanding the possible risks to delivery of West of Braintree Garden Community the Council is continuing to plan for development here as part of a larger garden community extending into Braintree. The exact delivery model for each garden community will be determined separately from the land-use planning process, however the Council will need to be satisfied that any proposed delivery model will realise all the garden city principles and a test will be established in the Development Plan Document to enable this to be determined. Delivery models could range from privately led arrangements to locally-led development corporations with compulsory purchase powers. In the case of a privately led arrangement there will be a requirement for a master</p>
--	---

	<p>developer to enter into a 'Quality and Collaboration Partnership' with the Council. If necessary, the Council will consider intervening directly to ensure the garden city principles are met within the proposed timetable set out within the Local Plan. Box FC 4 "Focussed Change 4 We object to Box FC 4 "Focussed Change 4 which proposes a change to require a master developer of a garden community in a privately led arrangement to enter into a "Quality and Collaboration Partnership" with UDC. This would be unnecessary in planning terms because the Regulation 19 Local Plan policies, which include for the preparation of a site-specific Development Plan Document (DPD), will be adequate, to empower the Local Planning Authority to secure a high-quality development. At this time, there is no detail provided in the Policy as to what form the Quality and Collaboration Agreement will take or what it may seek to include, which creates uncertainty. On the information available, these matters may hinder the effectiveness of the plan to deliver homes and jobs to the intended trajectory. Notwithstanding these points, we support the principle of partnership and working to achieve Quality and Collaboration; this will help to ensure that NUGC will be a high-quality new garden community delivered in accordance with the Town and Country Planning Association's (TCPA) Garden City Principles and to secure the objectives of draft Policy SP7 of the Local Plan. We look forward to working with UDC and the community to achieve this. Conclusion In summary, we object to Box FC 4 and to make the Plan sound, the following proposed Focussed Change should be deleted: In the case of a privately led arrangement there will be a requirement for a master developer to enter into a 'Quality and Collaboration Partnership' with the Council. Grosvenor is committed to continue working with UDC and other stakeholders to deliver a high-quality new garden community at NUGC, but the imposition of a Quality and Collaboration Agreement is not a necessary element of the policy and could impact upon the effectiveness of the Local Plan. As set out in our previous representations, we formally request that Grosvenor is invited to participate in all examination hearing sessions relevant to NUGC in accordance with section 20(6) of the Planning and Compulsory Purchase Act 2004. (Bidwells for Grosvenor; PSLPA45)</p>
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • The examination into the North Essex Authorities Local Plans has identified an elevated level of risk around the delivery of the West of Braintree Garden Community; however, the council has not provided any evidence to justified its continued confidence in the delivery of this site. The council should plan positively as part of this Plan to address such a risk by allocating additional sites, such as that off Beldams Lane, Bishop's Stortford, to ensure that the

	<p>current proposed plan is sufficiently flexible to respond to the identified risk at West Braintree and effective in delivering the required housing without relying on an early review of the plan to address an already anticipated shortfall in supply (Plansurv; PSLPA6)</p> <ul style="list-style-type: none">• Alongside Focused Change 3, this change seeks to amend the wording of a key policy relating to delivery of the Garden Communities (Policy SP5). The changes states that regardless of the uncertainties raised with the delivery of the West of Braintree Garden Community that the Council remain confident that the other two Garden Communities in the Local Plan; Easton Park and North Uttlesford can be delivered. However, as identified in our Regulation 19 Representations, we consider that the issues with the West of Braintree Garden Community highlight the complexities of delivering these sites and further go to prove the concerns we raised previously about timescales for Easton Park and North Uttlesford. The optimistic housing trajectory for Easton Park and North Uttlesford presents a risk to delivery of the Local Plan which is further compounded by the uncertainties of delivering such sites, as highlighted by the Council in relation to West of Braintree. In order to be sound a Local Plan must be effective (i.e. deliverable over its period) (NPPF paragraph 182). However, again, the significant and justified concerns raised here regarding the deliverability of the Garden Communities go to the heart of the soundness of the Local Plan. To rectify these soundness issues, as set out in our previous representations, further sites should be identified and allocated to ensure housing delivery in the early part of the plan period. Our representations highlighted the sustainability of land south of Stansted Mountfitchet and identified the exceptional circumstances which exist to justify its release from the Green Belt. These overriding economic and social benefits will assist in creating an important growth hub around Stansted Airport as part of the London Stansted Cambridge Corridor (LSCC) economic growth area. In short, it will contribute to the provision of sustainable development within the District. (Iceni Projects; PSLPA 35)• The proposed policy wording appears to acknowledge the possibility of the site being brought forward through other means, regardless of allocation within the Local Plan. Whilst Natural England does not raise concern with this in itself we would highlight to you the implications of this in the context of the emerging strategic solution, the Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS). Within the Regulation 19 draft plan, policy SP8 in relation to the West of Braintree Garden community includes wording that requires contributions to be collected towards this strategic solution (see point 9 of this policy). At present this is the only policy trigger for this strategic solution in the Uttlesford Local Plan. As per our advice letter dated 13th August 2018 and the subsequent interim advice sent in relation to the Essex RAMS (dated 16th August 2018 reference 244199) the Uttlesford Local Plan area falls within the Zone of
--	--

	<p>Influence (Zol) for the identified recreational impacts on the Essex coast designated sites. To ensure compliance the Habitats Regulations, mitigation is therefore required for all new residential housing that falls within this area. Should the West of Braintree development no longer proceed, there would consequently be no other reference to this requirement for contributions. Natural England therefore would reiterate the importance of including an overarching Essex RAMS policy which would be valid in the context of the West of Braintree site coming forward outside of the allocation, or any other development such as potential windfall that may be within this Zol. Should such wording not be included the plan would be considered unsound and not compliant with the Habitats Regulations (further assessment in the context of the Habitats Regulations is outlined as below). Regardless of participation in the strategic solution, compliance to the Habitats Regulations is required and therefore should this wording not be appropriate, we would advise that a similarly worded policy is included, with reference to the requirement for project level HRAs (Natural England; PSLPA97)</p> <ul style="list-style-type: none"> • 2.2. Focussed Change 4 2.2.1. The Council states within Focussed Change 4 that it is confident that the new Garden Communities at Easton Park and North Uttlesford can be delivered notwithstanding the possible risks associated with West of Braintree. 2.2.2. Whilst some of the concerns raised by the Inspector for the North Essex Examination related to specific issues, the Inspector had fundamental concerns with the ability of North Essex to deliver three new Garden Communities on such a scale in a relatively small geographic area. 2.2.3. This is very similar to the issues faced by Uttlesford where the three new Garden Communities include Easton Park for a potential 10,000 units, North Uttlesford for 5,000 units and West of Braintree Garden Community for 10,500-13,500 units with up to 3,500 to be located within Uttlesford itself. 2.2.4. This scale of development in one location is likely to encounter very similar issues to those raised by the North Essex Inspector, especially as it is across a relatively small geographic area and in close proximity to the North Essex large scale strategic proposals. 2.2.5. The uncertainty and concern that all of the above raises, further enhances our belief that the Plan should be paused to undertake a fundamental review of its strategy given the findings of the North Essex Inspector. (Gladman; PSLPA126) • For a small Authority like UDC to be attempting to plan for three new communities of the scale proposed would appear to be an even more ambitious and spurious undertaking. It is, therefore, considered neither realistic nor feasible for the District Council to seek to deliver three new Garden Communities. <p style="text-align: right;">The proposed Garden Community allocations, without further supporting evidence, continue to appear to be an attempt to allocate sites based on availability rather than considering sustainable, deliverable development according to the</p>
--	---

	<p>requirements of the NPPF. Without a good public transport link to enable West of Braintree residents to travel to employment in Saffron Walden or Stansted Airport and no local station for rail commuters to London, Cambridge, Colchester, Harlow or Chelmsford, almost all journeys would need to be made by car. This conflicts with national planning policy and will bring significant congestion to the A120 junction, M11 junction and the local road network.</p> <p>However, the Inspector has stated that the Garden Communities could not be developed in full without additional strategic road capacity and the timing for delivery of such strategic infrastructure improvements is unknown. Because of the high level of uncertainty over the future of West of Braintree GC, CPRE welcomes the cautious nature of the proposed changes to the wording of the policies relating to the GC. However, since the Braintree element fails on Viability, Deliverability, Sustainability and Transport all the same reasons apply for the UDC element and CPRE has to ask the question: in such circumstances, can UDC actually proceed with the proposed West of Braintree Garden Community? (CPREssex; PSLPA104)</p> <ul style="list-style-type: none">• North Essex Garden Communities Ltd (NEGC Ltd) was established to deliver the Garden Community proposals contained in the shared strategic Section 1 of the Braintree District Council, Colchester Borough Council, and Tendring District Council Local Plans which includes the proposal for the West of Braintree Garden Community. The company is wholly and equally owned by the aforementioned three district authorities as well as Essex County Council. In response to the consultation NEGC Ltd objects to Focussed Changes 1-6, and Focussed Change 9 of the Addendum of Focussed Changes to the Uttlesford District Council Local Plan (Reg 19) on the grounds that the changes are not necessary to make the plan effective and are therefore unjustified. NEGC Ltd considers the West of Braintree Garden Community as being fully achievable and presenting no elevated risks to delivery as is stated in the Focussed Changes. In order to elucidate these grounds for objection NEGC Ltd would like to be afforded the opportunity to submit evidence for consideration at the Examination, as well as provided with the opportunity to appear at the relevant Examination hearing sessions. (Colchester City Council; PSLPA160)• Galliard does not agree with the implication in FC 4 that a private sector-led arrangement will somehow require further controls to ensure quality. It is after all the private sector developer that has the experience of undertaking development, not the public sector organisation that has only been in existence for a short time and has no experience of carrying out development at all. Furthermore, there should not be a reference to a Quality and Collaboration Partnership in the proposed policy when no indication is given of what that would consist of. We proposed that
--	---

	<p>change is deleted and the previous reference to “quality” in local plan policy SP5 is retained. (WYG Grosvenor for Gallidard; PSLP176)</p>
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • C 4 should be reworded to read: <p style="margin-left: 40px;">The Council is confident hopeful that the new garden communities at Easton Park and North Uttlesford can be delivered. Notwithstanding Given the possible risks to delivery of West of Braintree Garden Community the Council is continuing to plan for development here as part of a larger garden community extending into Braintree but also proposes additional allocations across the district to ensure delivery is maintained in the event the West of Braintree Garden Community is delayed. The exact delivery model for each garden community will be determined separately from the land-use planning process, however the Council will need to be satisfied that any proposed delivery model will realise all the garden city principles and a test will be established in the Development Plan Document to enable this to be determined. Delivery models could range from privately led arrangements to locally-led development corporations with compulsory purchase powers. In the case of a privately led arrangement there will be a requirement for a master developer to enter into a 'Quality and Collaboration Partnership' with the Council. If necessary, the Council will consider intervening directly to ensure the garden city principles are met within the proposed timetable set out within the Local Plan. (Plansurv; PSLPA6)</p> • If your authority decides to participate in the Essex RAMS strategic solution we would recommend the inclusion of wording along the following lines: Where appropriate, contributions from developments will be secured towards mitigation measures identified in the Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS) which will be completed by the time the Local Plan is adopted. Prior to RAMS completion, the authority will seek contributions, where appropriate, from proposed residential development to deliver all measures identified (including strategic measures) through project level HRAs, or otherwise, to mitigate any recreational disturbance impacts in compliance with the Habitat Regulations and Habitats Directive. Regardless of participation in the strategic solution, compliance to the Habitats Regulations is required and therefore should this wording not be appropriate, we would advise that a similarly worded policy is included, with reference to the requirement for project level HRAs. (Natural England; PSLPA97) • An alternative approach is required; one that increases the number of new dwellings to be provided and accommodates the increase by promoting greater flexibility of location and consequent improved reliance on delivery across a wider range of locations. (Wellsbridge; PSLPA67)

<u>Uttlesford District Council Regulation Regulation 19 Local Plan Summary of Representations for the Addendum of Focussed Changes of the Regulation 19 Local Plan</u>	
FOCUSSED CHANGE 5	Summary of Responses
SUPPORT	4
OBJECT	27
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> North Essex Garden Communities Ltd (NEGC Ltd) was established to deliver the Garden Community proposals contained in the shared strategic Section 1 of the Braintree District Council, Colchester Borough Council, and Tendring District Council Local Plans which includes the proposal for the West of Braintree Garden Community. The company is wholly and equally owned by the aforementioned three district authorities as well as Essex County Council. In response to the consultation NEGC Ltd objects to Focussed Changes 1-6, and Focussed Change 9 of the Addendum of Focussed Changes to the Uttlesford District Council Local Plan (Reg 19) on the grounds that the changes are not necessary to make the plan effective and are therefore unjustified. NEGC Ltd considers the West of Braintree Garden Community as being fully achievable and presenting no elevated risks to delivery as is stated in the Focussed Changes. In order to elucidate these grounds for objection NEGC Ltd would like to be afforded the opportunity to submit evidence for consideration at the Examination, as well as provided with the opportunity to appear at the relevant Examination hearing sessions. (Colchester Borough Council; PSLPA161)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Anglian Water is the sewerage undertaker for the West of Braintree Garden community. The proposed change amends the wording of Policy SP5 to state that in the event that the West of Braintree garden community does not come forward as currently proposed the Council would undertake a Local Plan review. Anglian Water understands that the North Essex Authorities are intending to undertake further technical work relating to the garden communities in the North Essex Local Plan including West of Braintree (letter dated 19 th October 2018). With a further Local Plan consultation to be undertaken in 2019 (to close March 2019). The examination is proposed to be suspended by the North Essex Authorities until February 2019 to allow for this which would delay the adoption of the North Essex Part 1 Local Plan. As drafted the wording of Policy is not explicit about the circumstances in which a Local Plan Review would be triggered and what criteria would be used. (Anglian Water; PSLPA3) The examination into the North Essex Authorities Local Plans has identified an elevated level of risk around the delivery of the West of Braintree Garden Community; however, the council has not provided any evidence to justified its continued confidence in the delivery of this site. The council should plan positively as part of this Plan to address such a risk by allocating additional sites, such as that off Beldams Lane, Bishop's Stortford, to ensure that the current proposed plan is sufficiently flexible to respond to the identified risk at West Braintree and effective in delivering the

	<p>required housing without relying on an early review of the plan to address an already anticipated shortfall in supply. (Plansurv; PSLPA7)</p> <ul style="list-style-type: none"> • We support the changes in the policy wording to identify the issues with delivery of the West Braintree Garden Community however, we object to the policy wording in relation to the Local Plan Review. Our comments to Focused Change 2 set out our concerns in relation to West of Braintree in detail. (Iceni Projects; PSLPA36) • These changes are similar to that set out in Focussed Change 2 although also refers to the risk of significant delays, undeliverability, or inability to meet housing or jobs targets, as potential triggers for the early review of the Local Plan. Our same concerns and proposed remedy for Focussed Change 2 are equally applicable here. (Pegasus Group; PSLPA259) • Natural England does not raise concern with this in itself we would highlight to you the implications of this in the context of the emerging strategic solution, the Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS). Within the Regulation 19 draft plan, policy SP8 in relation to the West of Braintree Garden community includes wording that requires contributions to be collected towards this strategic solution (see point 9 of this policy). At present this is the only policy trigger for this strategic solution in the Uttlesford Local Plan. As per our advice letter dated 13th August 2018 and the subsequent interim advice sent in relation to the Essex RAMS (dated 16th August 2018 reference 244199) the Uttlesford Local Plan area falls within the Zone of Influence (Zol) for the identified recreational impacts on the Essex Coast designated Sites. To ensure compliance with the Habitats Regulations, mitigation is therefore required for all new residential housing that falls within this area, Should the West of Braintree development no longer proceed, there would consequently be no other reference to this requirement for contributions. Natural England therefore would reiterate the importance of including an overarching Essex RAMS policy which would be valid in the context of the West of Braintree site coming forward outside of the allocation, or any other development such as potential windfall that may be within this Zol. Should such wording not be included the plan would be considered unsound and not compliant with the Habitats Regulations (further assessment in the context of the Habitats Regulations is outlined as below). (Natural England; PSLPA254) • Focussed Change 5 As set out in our August representations, we consider there may be a requirement for UDC to consider alternative options to ensure early delivery of housing. We consider that further explanation should be provided regarding the proposed approach should the West of Braintree allocation prove undeliverable. For example, the Local Plan could include alternatives options, such as increasing the delivery rates for sites allocated in the Local Plan, or the addition of new allocation(s). We consider it would be helpful for the Local Plan to set these out as
--	---

	<p>alternative options alongside a potential early review, should this prove necessary to provide reassurance of available options to maintain soundness. (PSLPA124)</p> <ul style="list-style-type: none"> • The Council’s reliance on the WoB GC site to meet its housing and jobs requirements either within the Plan period or beyond can no longer be substantiated having regard to the uncertainties surrounding this and other GCs in North Essex following the Section 1 Examination of that Plan. The fallback position of an early review if it transpires that the WoB GC is not deliverable or delayed introduces yet further uncertainty and hence associated planning blight into the Plan-making process and is unacceptable on that score alone. The proposed wording of this Focussed Change is not justified and should be rejected.(Edward Gittins & Associates; PSLPA139) • The LP as amended still makes erroneous assumptions and the desirability / dependence on Garden Communities and the timing of their delivery. Delivery of 970 dwellings in Essex in the plan period at WoBGC is unsound as outlined by Inspector Clews in June 2018 (re North Essex Authorities) Examination. In view of uncertainty over WoBGC, the reference to Garden Communities there should be deleted. Alternative sites should be allocated to meet housing in the UDC Area. The LP remains unsound so these comments relate to Changes 2-6 inclusive and 9 (Stebbing Parish Council; PSLPA137) • There is a lack of clarification and detail as to how and when exactly this issue will be dealt with. UDC have not made it explicit what the threshold for “significant delays” to the delivery of WoBGC will be or at what stage the council will consider the site to be “undeliverable”. The expected timetable of the NEAs indicates that the NEA expected hearings to recommence in June 2019. this would be six months after UDC intends to submit their LP for examination. The approach taken by UDC to mitigate the risk of non-delivery or under-delivery of the WoBGC by setting a contingency for an early Local Plan Review is considered unsound. Basing the spatial strategy on the outcome of an examination which is not expecting 1.22 to recommence until June 2019 when the examination hearings for UDC's Local Plan are anticipated to commence is not a sound or positive plan-making strategy. it will not be possible for just a single policy to be reviewed. The housing requirement will need to be in line with the requirements of the Revised NPPF (2018) and the standard method calculation of housing need. The Review would therefore need to set out not only how the housing from the WoB GC would be provided for but also the additional housing set out in the standard method calculation. This would require a whole new spatial strategy which would not be sufficiently covered by a Local Plan Review. In addition, it is unclear as to how a Local Plan assessed against the 2012 NPPF and a Local Plan Review assessed against the Revised NPPF (2018) would work in practice or if it is a sound approach. This is a unique scenario in that there has never been a transition
--	--

	<p>period between two national policy frameworks, and the NPPG is not explicit in how reviews should be carried out of a Local Plan which has been assessed under the 2012 NPPF. UDC anticipates they will submit their Local Plan for examination in January 2019. Given a large number of LPAs are intending to submit their Local Plans at this time, hearings for UDC's Local Plan are unlikely to start until June 2019. Assuming the examination runs smoothly, adoption of the Local Plan is expected to be the end of 2019 or the beginning of 2020. As set out in the representations submitted previously, the housing trajectory for the period between 2022/23 and 2027/28 -and thus will be unable to demonstrate a five year housing land supply for a number of years during the middle of the plan period. This points towards a lack of early delivery sites which are an important aspect of the Local Plan for an LPA which has a track record of underdelivery. This will be further exacerbated in the event that WoB GC does not come forward in a timely manner, or at all. It is clear that UDC are failing to comply with paragraph 47 of the 2012 NPPF in this regard and that the current strategy will not maintain a five-year supply of housing land. The Local Plan therefore cannot be found sound on this basis. If UDC called for an early review of the Local Plan in order to address this undersupply of homes in early 2023, it would need to issue a Call for Sites and go out to public consultation before submitting to the Secretary of State for examination. Such a significant change in spatial strategy would be best addressed through a new Local Plan. If a Local Plan Review were to be adopted in late 2025 then delivery of dwellings to replace those units allocated to WoB GC, would most likely not occur until 2028. This represents a significant delay in the delivery of a large number of homes within the district. (Village Developments Takeley; PSLPA189)</p> <ul style="list-style-type: none"> • Focussed Change 5 We believe this change should apply to all three proposed garden communities.(WYG Group; PSLPA177) • The purpose of a Local Plan is to set out policies about housing and employment growth and appropriate locations for that growth over the period of that plan. The Uttlesford Addendum of Focussed Changes accepts that the Examination of the North Essex Authorities Local Plans has caused an elevated level of risk about the delivery of one of the sites that is integral to meeting the housing numbers set out in Uttlesford's Regulation 19 document. The text of Focussed Change 2 includes the following new wording: "If these risk issues are not capable of being resolved, and should that restrict the Council's ability to meet the housing requirement, then the Council will undertake an early review of the Local Plan to consider how the requirements can be met." Wording to the same effect is also to be found in Focussed Change 5 and Focussed Change 9. Given that this Local Plan is intended to cover a period up to and slightly beyond 2030 and noting how long it has taken to even get to this stage of the plan process, in my view the Plan should directly address the housing requirements set out within it. The Plan that is eventually submitted to national government should set out how the housing
--	---

	<p>requirements are to be met. If that requires further consultation, including setting out a range of possible strategies to meet the overall housing requirement, then so be it. In conclusion, I object to the wording in Focussed Changes 2, 5 and 9 that proposes, in the event of the West of Braintree Garden Community issues not being capable of being resolved, that there should be an early revision to this Local Plan. In my view, this Local Plan should address the issue fully, the matter should not be passed into some indefinite future. (PSLPA182)</p>
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • FC 5 should be reworded to read as follows: If it becomes apparent that Additional allocation have been made to mitigate the risk that the West of Braintree Garden Community will be significantly delayed, or is not deliverable, and should that restricts to ensure the Council’s ability to meet the homes and jobs requirements , then the Council will undertake an early review of the Local Plan to consider how these requirements can be met . (Plansurv; PSLPA7) • Policy SP 5 should be amended by the deletion of any reference to West of Braintree from the Garden Community Principles policy (Stebbing Parish Council; PSLPA81) • If your authority decides to participate in the Essex RAMS strategic solution we would recommend the inclusion of wording along the following lines: Where appropriate, contributions from developments will be secured towards mitigation measures identified in the Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS) which will be completed by the time the Local Plan is adopted. Prior to RAMS completion, the authority will seek contributions, where appropriate, from proposed residential development to deliver all measures identified (including strategic measures) through project level HRAs, or otherwise, to mitigate any recreational disturbance impacts in compliance with the Habitat Regulations and Habitats Directive. Regardless of participation in the strategic solution, compliance to the Habitats Regulations is required and therefore should this wording not be appropriate, we would advise that a similarly worded policy is included, with reference to the requirement for project level HRAs.(Natural England; PSLPA254) • Paragraph 61-046-20180913 of the NPPG sets out what LPAs can consider when determining whether policies should be updated as part of a Local Plan Review. It is our suggestion that any Local Plan Review should look at the following: <ul style="list-style-type: none"> The conformity with national planning policy. Changes to local circumstances; such as a change in Local Housing Need. Housing Delivery Test performance. Whether UDC can demonstrate a five year supply of deliverable sites for housing. Plan-making activity by other authorities, such as whether they have identified that they are unable to meet their housing need. The amount of considerations which would need to be looked at means that a review would not be sufficient and a

	brand new Local Plan would need to be progressed. (Village Developments, Takeley; PSLPA189)
--	---

<u>Uttlesford District Council Regulation Regulation 19 Local Plan Summary of Representations for the Addendum of Focussed Changes of the Regulation 19 Local Plan</u>	
FOCUSSED CHANGE 6	Summary of Responses
SUPPORT	6
OBJECT	17
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • ECC supports the amendment to ensure proposals must demonstrate the deliverability of the wider garden community. ECC also supports the requirement that 'Proposals that are not part of the larger cross-boundary site, and do not demonstrate the deliverability of the wider garden community, will be refused. (Essex County Council; PSLPA40) • Focused Changes 2 to 6 deal with the changes to the Plan to reflect the elevated risk around the delivery at West of Braintree GC. CCC supports these changes and notes the commitment to an early review should the delivery to the West of Braintree restrict the Council's ability to meet the housing requirement within Policy SP3 and Policy SP5. Focused change 6 to Policy SP8 West of Braintree Community provides additional wording in relation to the land within Uttlesford for the Garden Community not being deliverable on its own without the land in Braintree District Council's area. This is noted as the garden community straddles the District boundary with Braintree District Council and should come forward as a comprehensive package to ensure all supporting infrastructure is delivered. CCC has no further comments to make on the additional changes. CCC continues to be supportive of the approach taken in the Local Plan and do not raise any objections under soundness or legal compliance. (Chelmsford City Council; PSLPA60) • This change is strongly supported as it will help to ensure that the garden communities will be delivered in a comprehensive and holistic way which can ensure that the necessary infrastructure and community facilities are delivered at the same time as the housing development. As set out in the policy a Development Plan Document will be produced for the Garden Community which will provide a detailed basis for any future planning applications. (Braintree District Council; PSLPA60) • We welcome the additional text which seeks to reflect the elevated risk around the delivery at West of Braintree and provide clarity regarding the need for a strategic cross boundary approach.(Historic England; PLSPLA244) • The Andrewsfield New Settlement Consortium (ANSC) has consistently supported the West of Braintree Garden Community (WBGC) as a cross-boundary development. ANSC continues to work with Galliard Homes (the promoter of additional land forming part of the area of search within Uttlesford controlled by Galliard Homes) as well as with Braintree and Uttlesford District Councils and with North Essex Garden Communities to plan for a cross-boundary development. Whilst ANSC fully endorses the approach of the West of Braintree Garden Community being a cross-boundary development, it is submitted that land only within

	<p>Braintree District (and therefore excluding the Uttlesford land), could reasonably be delivered as a new Garden Community. ANSC does not currently envisage bringing forward land controlled by ANSC within Uttlesford District as a garden community development without the Uttlesford land being part of a larger cross-boundary development.(GL Hearn; PSLPA233)</p> <ul style="list-style-type: none"> • North Essex Garden Communities Ltd (NEGC Ltd) was established to deliver the Garden Community proposals contained in the shared strategic Section 1 of the Braintree District Council, Colchester Borough Council, and Tendring District Council Local Plans which includes the proposal for the West of Braintree Garden Community. The company is wholly and equally owned by the aforementioned three district authorities as well as Essex County Council. Â In response to the consultation NEGC Ltd objects to Focussed Changes 1-6, and Focussed Change 9 of the Addendum of Focussed Changes to the Uttlesford District Council Local Plan (Reg 19) on the grounds that the changes are not necessary to make the plan effective and are therefore unjustified. Â NEGC Ltd considers the West of Braintree Garden Community as being fully achievable and presenting no elevated risks to delivery as is stated in the Focussed Changes. In order to elucidate these grounds for objection NEGC Ltd would like to be afforded the opportunity to submit evidence for consideration at the Examination, as well as provided with the opportunity to appear at the relevant Examination hearing sessions. (Colchester City Council; PSLPA162)
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • The proposed change seeks to further restrict delivery of sustainable sites in favour of the delivery of the West of Braintree Garden Community whose delivery is already in doubt. The proposed change makes the plan less effective and less flexible forcing an early review of the Local Plan rather than dealing with the issues up front. (Plansurv; PLSP8) • In view of the above considerations SPC consider that Policy SP 8 is not sound because it is not: a) consistent with national policy. b. positively prepared, c. justified or d.effective (JB Planning / Stebbing Parish Council; PSLPA82) • This change requires that proposals for the Garden Community are capable of demonstrating its deliverability. This is considered a fair amendment however it underlines the importance of having the appropriate evidence for deliverability of the site. At present, the Local Plan’s evidence base has not demonstrated deliverability, so this essentially reinforces our soundness concerns as expressed elsewhere within these representations. (Pegasus Planning / Bloor Homes; PSLPA112) • Following the Examination of the North Essex Authorities Joint Strategic (Section 1) Plan, CPRE welcomed the Planning Inspector’s conclusion that the Garden Community proposals contained in the Plan are not adequately justified and have not been shown to have a reasonable prospect of being viably developed.

	<p>His assessment of the evidence highlighted the significant and fundamental shortcomings which were expressed at public consultation stages and in written representations as part of the Examination process. In particular, CPRE considered the Plan to be “unsound” in relation to sustainability issues; the scale of the proposals (with likely adverse impact on existing settlements and the natural environment); loss of high quality agricultural land; uncertainties about trunk road improvements and other infrastructure requirements. CPRE also agreed with the Inspector’s view that simultaneously bringing forward three Garden Communities on the scale proposed in the submitted Plan is difficult to justify and to deliver. If the Inspector felt that it was too ambitious for three local authorities working together to attempt to deliver three new Garden Communities, then CPRE suggests that for a small authority (i.e. Uttlesford DC) to be attempting to plan for three new communities of the scale proposed would appear to be an even more ambitious and spurious undertaking. It is, therefore, considered neither realistic nor feasible for the District Council to seek to deliver three new Garden Communities. The proposed Garden Community allocations, without further supporting evidence, continue to appear to be an attempt to allocate sites based on availability rather than considering sustainable, deliverable development according to the requirements of the NPPF. Without a good public transport link to enable West of Braintree, residents to travel to employment in Saffron Walden or Stansted Airport and no local station for rail, commuters to London, Cambridge, Colchester, Harlow or Chelmsford, almost all journeys would need to be made by car. This conflicts with national planning policy and will bring significant congestion to the A120 junction, M11 junction and the local road network. However, the Inspector has stated that the Garden Communities could not be developed in full without additional strategic road capacity and the timing for delivery of such strategic infrastructure improvements is unknown. Because of the high level of uncertainty over the future of West of Braintree GC, CPRE welcomes the cautious nature of the proposed changes to the wording of the policies relating to the GC. However, since the Braintree element fails on Viability, Deliverability, Sustainability and Transport all the same reasons apply for the UDC element and CPRE has to ask the question: in such circumstances, can UDC actually proceed with the proposed West of Braintree Garden Community? (CPREssex; PSLPA106)</p> <ul style="list-style-type: none"> • 2a. Reserve sites to cater for the non 2b. delivery of the West of Braintree Garden Community GC Should be included for 2c. Not considered effectively as impact of non-delivery or lateness of Garden Communities not catered for. 2d. No reference to NPPF July 2018. (Go Holdings; PSLPA150) • There is an over-dependency on the garden communities and an
--	--

	<p>over-ambitious expectation as to timing/delivery. The proposed delivery of 970 dwellings in the plan period as proposed for the WoBGC is clearly flawed and unsound given the findings and conclusions of Inspector Clews who examined the North Essex Authorities “Strategic Section 1 Plan”(June 2018). (PSLPA216)</p> <ul style="list-style-type: none">• Focused Change 6, Galliard agrees that all proposals should demonstrate how they would be delivered in the context of the wider garden community, and, by definition, they will be part of the larger cross-boundary site. That doesn’t mean that every proposal, or phase, has itself to be cross-boundary. The justification for this proposed change in policy suggests the Council believes development only in Uttlesford is not sustainable. Galliard disagrees with this and draws attention to the MHCLG Prospectus again where paragraph 5 “Scale“ explains that Garden Villages can provide for 1,500 to 10,000 homes. The ultimate capacity suggested by the Council for Uttlesford is 3,500, and Galliard has consistently taken the view it can deliver around 1,500 homes in the plan period. It has never agreed with the figure of 970 in the local plan on which it was not consulted. That is an arbitrary allocation and is being used by the Council as a basis for pushing back the first delivery of homes in its trajectory. <p>Furthermore, the following “new village” schemes have been the subject of funding under the Government’s previous Prospectus; Denethorpe, E Northants, up to 1,500 homes Longcross, Runnymede, Surrey Heath 1,300 homes Oxfordshire Cotswolds, West Oxfordshire, 2,200 homes All well below the 3,500 to be provided ultimately in Uttlesford, and in addition; Dunsfold Airfield, Surrey has an allocation in the recently-adopted Waverley Local Plan and has been granted outline planning consent for 1800 homes.</p> <p>We attach evidence prepared by Gerald Eve to demonstrate that a development of in the region of 1,500 homes within Uttlesford is viable in its own right, although, to re-affirm, it would be Galliard’s intention for this to represent early phase(s) of the wider cross-boundary garden community of West of Braintree, as anticipated by policy SP 8. The full garden community master plan would be drawn up in collaboration with the local authorities, infrastructure providers and the local communities. Notwithstanding the comments of the N Essex Plan Inspector, a very much more positive view of West of Braintree should be taken than in the Focused Changes. Proper recognition should be given to the relatively straightforward provision of initial infrastructure to begin the delivery of homes when compared to other proposals of a similar scale, both as described in policies SP 6 and SP 7, and the other two new communities in N Essex, especially on the Colchester-Braintree borders. This you will be aware has slipped way back in the delivery trajectory, due to uncertainties over the delivery of new strategic road</p>
--	--

	<p>improvements. In these circumstances, it is even more important that any procedural obstacles to the delivery of West of Braintree are removed. (WYG for Grosvenor; PSLPA178)</p>
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • FC6 should be reworded as follows: Permission will be granted for a new garden community of 10,500-13,500 homes at land West of Braintree. Proposals must demonstrate the deliverability of the wider garden community. Proposals that are not part of the larger cross-boundary site, and do not demonstrate the deliverability of the wider garden community, will be refused. The details and final number of homes will be set out in a Strategic Growth Development Plan Document to be prepared jointly by Uttlesford and Braintree District Councils. Up to 3,500 of these homes will be in Uttlesford. All criteria in this policy relate to the part of the garden community to be delivered in Uttlesford. (Plansurv; PSLPA8) • Policy SP 8 should be amended by the deletion of any reference to West of Braintree from the Garden Community Principles policy. (Stebbing Parish Council; PSLPA82)

<u>Uttlesford District Council Regulation Regulation 19 Local Plan Summary of Representations for the Addendum of Focussed Changes of the Regulation 19 Local Plan</u>	
<u>FOCUSSED CHANGE 7</u>	Summary of Responses
SUPPORT	2
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • The change is supported as it ensures that the Plan protects environmentally sensitive sites and meet soundness requirements. (Essex Wildlife Trust; PSLPA42) • Please note: For Special Areas of Conservation (SACs) designated under the Habitats Directive, the IROPI grounds on which a plan or project can proceed depends on the nature of the site that will be affected. Where a plan or project will negatively affect a “priority” habitat or species on a site for which they are a protected feature, the competent authority can normally only consider reasons relating to human health, public safety, or beneficial consequences of primary importance to the environment. Other imperative reasons of overriding public interest can only be considered having obtained and had regard to the opinion of the European Commission. In all other cases competent authority can consider other imperative reasons of overriding public interest including those relating to social or economic benefit in addition to those of human health, public safety, or beneficial consequences of primary importance to the environment. This would include cases where priority habitats and species are present on a European site but they would not be affected by the proposal. (Braintree District Council; PSLPA61)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • The reference to EN8, Protecting and Enhancing the Natural Environment, should be EN7. (PSLPA31) • In view of the above considerations we consider that Policy EN 8 is not sound because it is not “consistent with national policy”² “positively prepared”, “justified” or “effective” (Stebbing Parish Council; PSLPA83) . • Epping Forest SAC - Changes to policy EN8 (third paragraph) “ Natural England notes the updated wording to this policy to include the need for an Appropriate Assessment where mitigation measures are proposed to address impacts on designated sites, such as the Epping Forest SAC. Natural England supports this requirement, however it should be clear that a Habitats Regulations Assessment should be undertaken where there are potential impacts to designated sites as a result of a plan or project, not just where mitigation measures are proposed; the policy wording therefore needs to be amended accordingly. Such wording needs to be included in the policy itself, it is not sufficient to include the wording in the supporting paragraphs.(Natural England; PSLPA 61)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Amend reference to EN8 to read EN7 (PSLPA31) • Where a site of International designation for nature conservation importance is adversely affected by the proposals, permission will be refused unless the District Council is satisfied that: there are

	<p>imperative reasons of overriding public interest, which could be of a social or economic nature, sufficient to override the harm to the site; or, there are imperative reasons of overriding public interest relating to human health, public safety or benefits of primary importance to the environment. (Essex Wildlife Trust; PSLPA42)</p> <ul style="list-style-type: none">• The justification to this change in policy should also make reference to the Essex RAMS. Where development falls within this Zone of Influence for recreational impacts, mitigation measures, including appropriate contributions will need to be sought in line with this strategic solution (Natural England; PSLPA248)
--	---

<u>Uttlesford District Council Regulation Regulation 19 Local Plan Summary of Representations for the Addendum of Focussed Changes of the Regulation 19 Local Plan</u>	
FOCUSSED CHANGE 8	Summary of Responses
SUPPORT	1
OBJECT	5
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> The change is supported as it ensures that the Plan protects environmentally sensitive sites and meets the soundness requirements. (Braintree District Council; PSLPA62)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> The “Proposed Change” outlined does not clearly reflect the reasons for the focussed change as outlined in Section 1.2 (3) on page 3 of the Addendum. It is recommended that the wording on page 3 is adapted and included in Policy EN15. (Essex County Council ; PSLPA41) Focussed Change 8 “Changes to policy EN15 (additional criterion) “Natural England welcomes the addition of a broader criterion for air quality impacts on designated sites. We would refer you to our previous letter dated 13th August 2018 for full comments in relation to the issues relating to air quality impacts on the Epping Forest SAC. Work is still on-going to determine the extent of air quality impacts to Epping Forest SSSI, SAC and therefore it is advised that a precautionary approach be taken, further comments on this are expanded on below in the context of the Habitats Regulations (Natural England; PSLPA250)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Delete the “Proposed Change” outlined in the Addendum and replace with the following wording. 10. Adequate information has been submitted for the Council to undertake an appropriate assessment to demonstrate that the Air Quality of Epping Forest SAC will not be adversely affected by the proposed development. This may include provision of mitigation measures. (Essex County Council; PSLPA41) Policy EN 15 should be amended affecting the air quality of habitats or species of other sites of importance. (Natural England; PSLPA250)

<u>Uttlesford District Council Regulation Regulation 19 Local Plan Summary of Representations for the Addendum of Focussed Changes of the Regulation 19 Local Plan</u>	
<u>FOCUSSED CHANGE 9</u>	Summary of Responses
SUPPORT	2
OBJECT	21
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • This change is noted and it provides the Plan with the necessary flexibility to deal with any delays or alterations to the garden communities including West of Braintree. The change does not mean that UDC are not committed to the garden communities, but provides a fall-back position to adopt if necessary. As such BDC supports the change. However the wording of the change needs some clarity and therefore we suggest the following text; If it becomes apparent one or more of the Garden Communities is significantly delayed, or is not deliverable, and should that restrict the Council’s ability to meet the homes and jobs required then the Council will undertake an early review of the Local Plan to consider how these requirements can be met; That focussed changes 1, 3 and 10 are noted and supported by Braintree District Council. (Braintree District Council; PSLPA63) • Focussed change 9 considers the action to be taken by the Council, through an early review of the Local Plan, if one or more of the Garden Communities is significantly delayed, or is not deliverable. It is notable that focussed change 9 is inconsistent with focussed changes 1 to 5 which only make reference to the West of Braintree Garden Community. It is submitted that focussed change 9 represents an appropriate focussed change, and that focussed changes 1 to 5 should also be amended to refer to the eventuality of the West of Braintree, Colchester Braintree Borders or the Colchester Tendring Borders Garden Communities being delayed or a change in circumstance resulting in part of one of more of the three Garden Communities being delivered. (GL Hearn PSLPA234) • We welcome the addition of a new appendix to highlight which policies are strategic and which are not. We welcome the identification of policies EN1 and C1 as strategic policies. It might be even clearer if this differentiation was also made next to each policy within the main body of the local plan, for example by the addition of the letter S next to strategic policies. This approach has been used by a number of other local authorities. (Historic England; PSLPA249)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Anglian Water is the sewerage undertaker for the North Uttlesford and West of Braintree Garden communities. We are also sewerage undertaker for the part of the area which forms part of the Great Easton Garden Community as identified in the Regulation 19 Local Plan. The proposed change amends the wording of Policy M2 to state that if one or more garden community is significantly delayed or is shown to be undeliverable a Local Plan Review will be undertaken. In addition the North Essex Authorities are to review the timing of the proposed garden communities including the land

	<p>west of Braintree garden community (letter dated 19 th October 2019). As drafted the wording of Policy is not explicit about the circumstances in which a Local Plan Review would be triggered and what criteria would be used. (Anglian Water; PSLPA4)</p> <ul style="list-style-type: none"> • This proposed change seeks to require a Local Plan Review if it were to become apparent one or more of the Garden Communities is significantly delayed, or is not deliverable, and should that restrict the Council’s ability to meet the homes and jobs requirements. We raise issue regarding this approach to the West of Braintree Garden Community in our comments to Focused Change 2. Â However, Focused Change 9 seeks to apply this Local Plan Review mechanism to all Garden Communities. Our Regulation 19 representations, and our comments to Focused Change 4, already identify the flaws with the anticipated timescales for delivery of the Easton Park and North Uttlesford Garden Communities and which necessitate the need to identify and allocate further land for housing in the early part of the plan period. In order to be sound a Local Plan must be effective (i.e. ‘deliverable over its period’) and justified (NPPF paragraph 182). The flaws with the Council strategy raised above, therefore, go to the soundness of the Local Plan. Â Without prejudice to this position, if the Inspector were to consider a Local Plan Review suitable then clear trigger mechanisms and timescales must be applied. (Iceni Projects; PSLPA37) • There are severe doubts that Elsenham could overcome the connectivity disadvantages of its location sufficiently to be regarded as consistent with national policy or effective in being able to secure sustainable development (Examination of the Uttlesford Local Plan: Inspector’s Conclusions , 2.16). In Section 3.67, Table 5, of the Local Plan it is shown that the total number of dwellings built and scheduled in Elsenham is 480 (173 + 307). <p style="padding-left: 40px;">The Parish Council’s analysis indicates that in December 2014 over 400 of these dwellings remained to be built and occupied. In other words, more than 400 further dwellings will be occupied in the village in the period since the Inspector decided that a further allocation could not be sustained. 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. (Elsenham Parish Council; PSLPA25)</p> <ul style="list-style-type: none"> • SPC is firmly of the opinion that all of the above evidence fully demonstrates that there is now considerable doubt and uncertainty regarding the suitability and deliverability of the proposed West of Braintree Garden Community allocation within the Plan period. Consequently, it would be inappropriate to seek to rely upon the provision of the proposed delivery of 970 dwellings. As a consequence, the allocation should be removed
--	---

	<p>from the Plan. Furthermore, it is considered that the serious deficiencies in the way and means that the Sustainability Appraisal process has been carried out remain apparent. It is evident from reading the SA Addendum and Spatial Strategy Background Paper that the serious flaws in the SA process identified by the North Essex Joint Examination Inspector with regard to the selection and designation of the Garden Communities (including West of Braintree) have yet to be properly rectified. 74. SPC believes given the significant amount of uncertainty regarding the status of West of Braintree Garden Community and whether or not it will be confirmed eventually as a strategic allocation in the North Essex Joint Spatial Plan, it would be totally inappropriate for UDC to confirm it now, then seek to undertake an early review of the Local Plan to consider how homes and job requirements can be met if the Garden Community is delayed or non-deliverable. Especially given that such a review would occur at some unspecified date in the future, and only when it is judged to have restricted UDC's ability to meet its home and jobs requirements. (Stebbing Parish council; PSLPA86)</p> <ul style="list-style-type: none"> • These changes are similar to that set out in Focussed Change 2 although also refers to the risk of significant delays, undeliverability, or inability to meet housing or jobs targets, as potential triggers for the early review of the Local Plan. Our same concerns and proposed remedy for Focussed Change 2 are equally applicable here (Bloor Homes; PSPLA116) • Natural England notes the recommended changes to reference the potential risk in relation to the West of Braintree Garden Community. Whilst Natural England is not concerned specifically in relation to the proposed wording, the implications of this development not being brought forward need due consideration. The proposed policy wording appears to acknowledge the possibility of the site being brought forward through other means, regardless of allocation within the Local Plan. Whilst Natural England does not raise concern with this in itself we would highlight to you the implications of this in the context of the emerging strategic solution, the Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS). Within the Regulation 19 draft plan, policy SP8 in relation to the West of Braintree Garden community includes wording that requires contributions to be collected towards this strategic solution (see point 9 of this policy). At present this is the only policy trigger for this strategic solution in the Uttlesford Local Plan. As per our advice letter dated 13th August 2018 and the subsequent interim advice sent in relation to the Essex RAMS (dated 16th August 2018 reference 244199) the Uttlesford Local Plan area falls within the Zone of Influence (Zol) for the identified recreational impacts on the Essex coast designated sites. To ensure compliance with the Habitats Regulations, mitigation is therefore required for all new residential housing that falls within this area. Should the West of Braintree development no longer proceed, there would consequently be no other reference to this requirement for contributions. Natural
--	---

	<p>England therefore would reiterate the importance of including an overarching Essex RAMS policy which would be valid in the context of the West of Braintree site coming forward outside of the allocation, or any other development such as potential windfall that may be within this ZoI. Should such wording not be included the plan would be considered unsound and not compliant with the Habitats Regulations (further assessment in the context of the Habitats Regulations is outlined as below). (Natural England; PSLPA249)</p> <ul style="list-style-type: none"> • This is a unique scenario in that there has never been a transition period between two national policy frameworks, and the NPPG is not explicit in how reviews should be carried out of a Local Plan which has been assessed under the 2012 NPPF. UDC anticipates they will submit their Local Plan for examination in January 2019. Given a large number of LPAs are intending to submit their Local Plans at this time, hearings for UDC's Local Plan are unlikely to start until June 2019. Assuming the examination runs smoothly, adoption of the Local Plan is expected to be the end of 2019 or the beginning of 2020. As set out in the representations submitted previously, the housing trajectory for the period between 2022/23 and 2027/28 -and thus will be unable to demonstrate a five year housing land supply for a number of years during the middle of the plan period. This points towards a lack of early delivery sites which are an important aspect of the Local Plan for an LPA which has a track record of underdelivery. This will be further exacerbated in the event that WoB GC does not come forward in a timely manner, or at all. It is clear that UDC are failing to comply with paragraph 47 of the 2012 NPPF in this regard and that the current strategy will not maintain a five-year supply of housing land. The Local Plan therefore cannot be found sound on this basis. If UDC called for an early review of the Local Plan in order to address this undersupply of homes in early 2023, it would need to issue a Call for Sites and go out to public consultation before submitting to the Secretary of State for examination. Such a significant change in spatial strategy would be best addressed through a new Local Plan. If a Local Plan Review were to be adopted in late 2025 then delivery of dwellings to replace those units allocated to WoB GC, would most likely not occur until 2028. This represents a significant delay in the delivery of a large number of homes within the district.(Village Developments; PSLPA190)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Alternative more appropriate wording for focussed change 9 would read: "If it becomes evident that one or more of the three Garden Communities is significantly delayed, or is not deliverable, and should that restrict the Council's ability to meet homes and employment requirements then the Council shall undertake an early review of the Local Plan to consider how these requirements can be met". (GL Hearn PSLPA234) • Delete Focussed Change 9 (Bloomhall / Plansurv; PSLPA9) • Policy M 2 should be amended by the deletion of any reference to West of Braintree Garden Community given the elevated level of risk associated with it, together with significant evidence now

	<p>being available which calls into serious question its suitability (Stebbing Parish Council; PSLPA85)</p> <ul style="list-style-type: none">• If your authority decides to participate in the Essex RAMS strategic solution we would recommend the inclusion of wording along the following lines: Where appropriate, contributions from developments will be secured towards mitigation measures identified in the Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS) which will be completed by the time the Local Plan is adopted. Prior to RAMS completion, the authority will seek contributions, where appropriate, from proposed residential development to deliver all measures identified (including strategic measures) through project level HRAs, or otherwise, to mitigate any recreational disturbance impacts in compliance with the Habitat Regulations and Habitats Directive. Regardless of participation in the strategic solution, compliance to the Habitats Regulations is required and therefore should this wording not be appropriate, we would advise that a similarly worded policy is included, with reference to the requirement for project level HRAs (Natural England; PSLPA246)• Paragraph 61-046-20180913 of the NPPG sets out what LPAs can consider when determining whether policies should be updated as part of a Local Plan Review. It is our suggestion that any Local Plan Review should look at the following:<ul style="list-style-type: none">* The conformity with national planning policy.* Changes to local circumstances; such as a change in Local Housing Need.* Housing Delivery Test performance.* Whether UDC can demonstrate a five year supply of Deliverable sites for housing.* Plan-making activity by other authorities, such as whether they have identified that they are unable to meet their housing need.The amount of considerations which would need to be looked at means that a review would not be sufficient and a brand new Local Plan would need to be progressed. (Village Developments; PSLPA190)
--	---

<i>Uttlesford District Council Regulation 19 Local Plan Summary of Representations for the Addendum of Focussed Changes of the Regulation 19 Local Plan</i>	
<u>FOCUSSED CHANGE 10</u>	Summary of Responses
SUPPORT	None
OBJECT	None
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	

<u>Uttlesford District Council Regulation Regulation 19 Local Plan Summary of Representations for the Addendum of Focussed Changes of the Regulation 19 Local Plan</u>	
<u>Spatial Strategy Background Paper</u>	Summary of Responses
SUPPORT	1
OBJECT	6
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Support the Spatial Strategy Background Paper particularly with reference to the conclusions justifying the proposed spatial strategy to plan for 3 Garden Communities. The paper represents a robust and comprehensive explanation of the spatial strategy option testing process that Uttlesford District has progressed since 2015. (PSLPA237 Andrewsfield New Settlement Consortium)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Consider that the paper clearly explains how the Council arrived at its development strategy but do not fully agree with how that process was undertaken or that we concur with the conclusions. There does not appear to be any attempt to find an alternative site to North Uttlesford GC with fewer impacts on the historic environment since the Regulation 19 Consultation. The table on page 35 of the Paper underplays Historic England’s level of concern in 2015 (Historic England provided initial advice on each of the areas of search. Historic England indicated which areas gave rise to the greatest levels of concern in heritage terms and stated that, of the new settlement area of search options (1-9) they had ‘considerable concerns’ about the development of Areas 1 (M11 Junc 9a east), 7 (North of A120, west of Great Dunmow) and 8 (South of A120) and omits specific reference to Historic England’s comments on specifically the North Uttlesford site in 2017 (‘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’). (PSLPA252 Historic England) Text on page 52 of Paper is misleading. Whilst the HIA does indeed indicate a small area for development, it absolutely does not indicate an area for ‘the’ development where impact can be minimised. The statement is misleading and should be removed. (PSLPA185 J Francis) Reserve sites in Felsted (10Fel15 land between Howlands and Jollyboys Lane and 13Fel15 land south of Braintree road) should be considered to cater for the non-delivery of the West of Braintree GC. (PSLPA155 Go Holdings) There is an over-dependency on the garden communities. WoBGC should be replaced by alternative sites. The latest work on the SA is the right time to reconsider the three new communities and whether reasonable alternatives including extensions to villages and market towns have a greater role to play. (PSLPA218 Mr and

	<p>Mrs A Martin)</p> <ul style="list-style-type: none"> • Flexibility of housing supply is needed an additional sites in Felsted (13Fel15 and 14Fel15) should be considered (PSLPA187 Catesby Estates) • Object to Appendix 3 of the Spatial Strategy and the conclusions relating to 09GtDun15 (Dunmow Park). The site was assessed positively as an alternative site within the SA (ref GtDUN17). It is unclear therefore how the site has been differently assessed in this Paper on grounds relating to sustainable patterns of development, particularly in light of the fact that the site is located considerably closer to the town centre when compared with other allocations in the emerging Local Plan. The Council should amend their assessment of this site so that it concludes that the site would result in a sustainable pattern of development. In doing so, the site should be reassessed as a potential location for a reserve site to meet the housing need in the short term whilst further evidence is gathered in respect of the West of Braintree Garden Community. (PSLPA209 Bovis Homes)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Reference to the WoBGC should be deleted in its entirety from all parts of the Plan and alternative sites allocated to meet housing need in the District. (PSLPA218 Mr and Mrs A Martin) • Remove the West of Braintree Garden Community from the emerging Local Plan’s housing trajectory. The Council should allocate additional sites to meet the housing need in the short to medium term, whilst further evidence is gathered to demonstrate the deliverability of the West of Braintree Garden Community. (PSLPA209 Bovis Homes)

<u>Uttlesford District Council Regulation 19 Local Plan Summary of Representations for the Addendum of Focussed Changes of the Regulation 19 Local Plan</u>	
<u>Review of Employment Policies Background Paper</u>	Summary of Responses
SUPPORT	1
OBJECT	14
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • ANSC supports the employment paper as being informative to policies SP4, SP5 and SP8, and that the recommendations from the employment paper should form the basis of further detailed analysis to inform a future Strategic Growth Development Plan Document. (ANSC PSLPA235)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • We strongly support paragraph 3.76 Regulation 19 Local Plan, which states that the Preferred Scenario growth option is the most appropriate growth to plan for as it balances jobs growth with growth in homes, in line with the evidence from the 2017 HJA report. This scenario supports the provision of 16,000 jobs over the Local Plan period, with London Stansted Airport being the primary driver for this substantive uplift in Uttlesford. Saying this, as specified by paragraph 2.3.14 of the 2018 HJA report, there needs to be greater recognition that London Stansted Airport will be the primary driver for growth in Uttlesford. We object to Policy SP4, stating that provision will be made for a net increase of 14,000 jobs. As the Plan indicates that the Preferred Scenario growth option is the most appropriate growth to plan for, the Policy should reflect the 16,000 jobs figure. By not providing for a minimum net increase of 16,000 jobs, the Plan conflicts with paragraph 16 of the revised NPPF, which states that plans should be positively prepared. The allocation of our Client’s site as a Proposed Employment Area will enable Uttlesford to plan positively for future employment growth. (PSLPA144 Pigeon Investment) • We support the findings and recommendations of Hardisty Jones Associates 2018, but object to the decision not to incorporate any of these suggested changes into the Addendum. On the basis that HJA 2018 consider the ELR has serious shortcomings and that the FEMA comprises the most appropriate evidence base, the employment strategy contained in the Regulation 19 Local Plan cannot be considered sound. One of our criticisms of policies EMP1 and SA1 is the strategy to permit non-airport related uses on 55 hectares in the North Stansted Employment Area, on the basis that it is not supported by the evidence base. The FEMA which does not recommend any such strategy. HJA 2018 identifies that the lack of justification for the oversupply created through this strategy could be deemed a risk. We agree with this conclusion and advocate the reasonable alternative of allocating alternative employment land within the

	<p>district, with ready access to the airport. (PSLPA11 WRC Morton Trust)</p> <ul style="list-style-type: none"> • The Hardisty Jones report and the Council's dismissal of its recommendations have done nothing to improve the soundness of the plan. (PSLPA12 K McDonald) • Agree that the 5 recommendations regarding changes to the Local Plan made by HJA 2018 will add clarity to the Plan but do not consider they will address the soundness concerns raised at the regulation 19 stage. In addition, we object to the decision not to incorporate any of these suggested changes into the Addendum. <ul style="list-style-type: none"> ○ Object that HJA 2018 does not suggest that further consideration should be given as to whether the office supply pipeline adequately reflects qualitative needs in line with the recommendations of the ELR. ○ The Hardisty Jones report contains an analysis of the delivery of office and other business space accommodation from the Garden Communities. However, because no amendments are proposed at this stage to the Garden Community policies it is impossible for Examination participants (including the proposers of each Garden Community) to indicate whether they consider any policy change that might arise from the Hardisty Jones report are sound. As such, we continue to have concerns regarding delivery from the Garden Communities. ○ The Hardisty Jones work does not address the desire to foster business start-ups and encourage the expansion of existing businesses which is needed to avoid unsustainable levels of out commuting. ○ The employment strategy at EMP1 fails to address the need for accommodation for small and growing companies and the Hardisty Jones recommendations do not address this shortcoming. ○ Whilst Hardisty Jones have recommended transparently setting out a supply pipeline for B1(a) delivery there is no further information available regarding the timing of this delivery, therefore our concerns regarding the proposed pattern of delivery set out in paragraph 5.20 of the Local Plan have not been addressed by HJA 2018. (PSLPA Jackson Management) • The report highlights the weakness of the data base and points to the need to be much more robust in terms of the evidence base. <ul style="list-style-type: none"> ○ The report acknowledges reliance on employment provision at Stansted North and at Chesterford Research Park – this creates a very narrow focus and exacerbates the risks of failure to deliver if either or both of these sites fail to perform. ○ The preceding reports are acknowledged not to provide an identified quantum of B class employment within the District ○ None of the policies listed provides an overall quantum for employment land requirements
--	---

	<ul style="list-style-type: none"> ○ The FEMA study is acknowledged not to provide the “most Helpful” interpretation as it ignores the impact of Stansted Airport as a primary driver for employment ○ The Local Plan cites 68.4% of out commuting- is this really a sustainable model? ○ There is acknowledged to be no consideration within the ELR of loss of existing stock and consequent impact on the overall supply ○ These issues are acknowledged to underestimate the future requirement- further clarity on both the requirements and how this should be met are suggested recommendations ○ The Garden Community employment provisions are both vague and unquantified both in terms of supply and demand, there are woolly aspirations to create one job per household but no indication of how this might be done and an over reliance on out commuting ○ The levels of proposed B class employment (which would cover office, industrial and warehouse together with R and D) are stated as being assumed to be 30% of all employment – I think this stands out as a woeful underestimation of the requirement and implies that 70% of all employment will be in other sectors. ○ The employment impact of the proposed Garden Settlements is stated to be relatively minor and therefore will not address the importance of employment provision particularly in the short to medium term given the projected timescale of delivery. (PSLPA38 FKY Ltd) <ul style="list-style-type: none"> ● The evidence of HJA 2018 report broadly reflects the ECC Reg 19 representation. (PSLPA43 ECC) ● HJA 2018 supports our view that there is no evidence to support the inclusion of the North Uttlesford Garden Community (NUGC) on the grounds it will provide housing for employment in the Biotech Sector, particularly at Chesterford Research Park (CRP). In summary, this says that <ul style="list-style-type: none"> ○ The overall demand stated for employment in the local plan has been overinflated by an allocation for CRP ○ The allocation for CRP is overinflated and well in excess of the requirements from both studies undertaken. ○ There is no evident need for North Uttlesford (or any other GC) to provide B Use employment land. <p>[References: Section 2.3.7 , 2.3.12 2.3.17, 2.3.21] (PSLPA93 Lt Chesterford PC)</p> <ul style="list-style-type: none"> ● The employment evidence clearly shows that there is no justification for the NUGC from employment from the Biotech sector as stated in the Local Plan. Furthermore, it finds that the employment allocation for Chesterford Research Park is unjustified and therefore the increase in the development boundaries indicated in Policy (PSLPA78 F Wilkinson)
--	---

	<ul style="list-style-type: none">• Surprised to see that there are no additional changes proposed to the Plan in response to this report. Changes in relation to the distribution of planned employment growth across the district could have significant implications for the historic environment and will need to be carefully considered and an opportunity for comment/consultation provided. (PSLPA253 Historic England)• Object that the Local Plan has not been amended in light of HJA 2018 and to the Council's approach to delay making the necessary changes to the emerging draft Local Plan. (PSLPA202 Birchanger Hall Farms)• Object that the Local Plan has not been amended in light of HJA 2018. It is therefore difficult to see how policies SP4 and especially EMP1 may be considered justified, given that the Council's own evidence base work has set out a clear recommendation that amendments are required in the form of additional evidence and revisions to the policies. Significant over provision is provided through employment sites allocated at Chesterford Research Park and North Stansted which each serve specific sectors. Alternative allocations are therefore necessary to help meet employment needs and provide choice and competition in the market for employment land that does not currently exist. Different locations have different attractions to potential occupiers. (PSLPA265/263 Endurance Estates)• On initial review it appears that aggregate supply is well in excess of the assessments of future requirements emerging from both the ELR and the FEMA study. This is largely a result of substantial allocations at Chesterford Research Park and North Stansted. The role of the identified allocations to meet needs beyond the plan period is not explicitly stated and there should be clearer justification around how the need for and supply of employment land interact. (PSLPA186 J Francis)• We object to both Policies EMP1 and EMP2 on the basis that the employment chapter seems to be predicated on the basis of the AECOM ELR's 'medium scenario' requirement for a net additional 10.2 ha of land for industrial use over the plan period to 2033, whereas the HJA West Essex and East Hertfordshire Assessment of Employment Needs report identifies a much greater need for employment land (22-24 ha) in Uttlesford District, driven by demand for B8 accommodation. In order to be found sound in examination, the Plan needs to contain policies that are clearly written and unambiguous and justified by proportionate evidence. Considering the weaknesses in the AECOM approach to identifying employment need and that the Plan does not clearly identify a total employment needs figure, the Plan conflicts with NPPF paragraph's 16 and 35, which require Plans to be clearly written and justified. We request that the Plan be revised to take into
--	---

	<p>account the higher employment needs figure. (PSLPA143 Pigeon Investment)</p> <ul style="list-style-type: none"> • We find it slightly strange that given the comments made by the N Essex Inspector the Council has not chosen to include at least the employment figures for Uttlesford in the GC policies, but has relegated them to the evidence base. We believe it would strengthen the deliverability of the communities if an allocation for employment land was included in each GC policy as the Inspector suggested. (PSLP180 WYG)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Policies EMP1 and EMP2 and SA1 should be amended in light of the recommendations of Hardisty Jones Associates 2018. (PSLPA11 WRC Morton Trust) • The recommendation outlined in the Hardisty Jones Associates 2018 report should be actioned and the policy wording amended. However, we do not consider that the recommendations address the soundness concerns we have previously raised and as such the amendments we have outlined within our original representations would still be required in order for the Plan to be found sound. (PSLPA Jackson Management) • Allocate additional employment land, in particular, on sites accessible to J8 of the M11, such as the respondent's site at Tilekiln Green. (PSLPA38 FKY Ltd) • UDC should provide appropriate clarification on this matter in the Draft Plan before submission; and employment floorspace allocations and/or employment land requirements included in Policies SP 6, SP 7 and SP 8, as reflected in HJA 2018. • It is recommended that UDC specify in policy the net quantum of office floor space and industrial land required over the Plan Period, together with the site allocations that will meet this requirement, as part of its submission plan. Clarification on the relationship of the 'net requirements' with the quantum of land allocated at the Northern Stansted Employment Area is also sought. The amendments will ensure a clear and coherent employment strategy that reflects net requirements over the Plan Period, as reflected in HJA 2018. (PSLPA43 ECC) • Withdraw Local Plan and start again. (PSLPA78 F Wilkinson) • The changes identified as being necessary should be incorporated and a further consultation undertaken on a revised Regulation 19 draft of the Plan. (PSLPA202 Birchanger Hall Farms) • Endurance Estates consider that land at Parsonage Road, Takeley, is a suitable location for employment development. (PSLPA265 Endurance Estates)

	<ul style="list-style-type: none">• We request that the Plan be revised to take into account the higher employment needs figure. (PSLPA143 Pigeon Investment)• We believe it would strengthen the deliverability of the communities if an allocation for employment land was included in each GC policy as the Inspector suggested. (PSLP180 WYG)
--	--

<u>Uttlesford District Council Regulation Regulation 19 Local Plan Summary of Representations for the Addendum of Focussed Changes of the Regulation 19 Local Plan</u>	
<u>Sustainability Appraisal</u>	Summary of Responses
SUPPORT	0
OBJECT	10
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Requirements for establishment of compliant Sustainability Appraisal not met; Evidence relied on in Revised SA not clear (PSLPA210 Great Chesterford PC) • It is considered that the Sustainability Appraisal Addendum does not adequately and appropriately assess the Alternatives to the West of Braintree Garden Community not delivering new homes within the Local Plan period. In particular, Alternative 5 (a return to a focus on the spatial strategy options that explored two GCs with more focus on existing towns and villages) was too easily dismissed, with no proper review on the grounds that if a site failed the assessment criteria the first time around it would fail an assessment review. A more detailed review of these sites and any others subsequently submitted should be undertaken in the context that there is a 970-dwelling shortfall that should be met. By way of an example, it is considered that there is land to the east of Newport which offers a sustainable and logical extension to the town and which could be delivered within the Local Plan period. • As a fundamental review of the whole SA is currently underway. As such we reserve our position to comment fully on the SA once the review is published for consultation. (PSLPA120 Landsec) • Natural England welcomes the update to the Sustainability Appraisal (SA) in the context of the focussed changes proposed. As per our comments for the HRA implications of the Essex RAMS, this should also be reflected in the SA with a full assessment of the impacts to the Essex Coast Designated Sites (please see the letter dated 16th August 2018 to your Local Authority for further information.) For the focussed changes in relation to the West of Braintree development, it would be anticipated that should changes to this allocation be made, i.e. either come forward outside of the allocation or alternative sites be sought in its stead that these would be assessed in full at the appropriate time and that a further appraisal would be undertaken with the review of the Local Plan. (PSLPA224 Natural England) • Comments on the <i>Sustainability Appraisal (SA) - October 2018 by Place Services</i> as one of the key documents of this focused addendum now seem to be redundant since it is to undergo a “fundamental update” following a report commissioned by the officers of UDC: <i>Independent Review of the Sustainability Appraisal – AECOM November 2018</i>. We welcome the fact that the officers at UDC have sought to identify the weaknesses in the SA by commissioning this report. (PSLPA93 Little Chesterford PC)

	<ul style="list-style-type: none"> • The SA has not assessed the implications of the up to date employment evidence base (PSLPA202 Birchanger Hall Farms) • It is Galliard’s view that the consideration of alternatives in the SA is open to question because an unjustifiable figure of 970 homes in the plan period at West of Braintree is used as a benchmark. Galliard has consistently promoted around 1,500 as a deliverable figure, and if this is used it could well be that the stated alternative sites, particularly Takeley, are not ‘reasonable’ as they do not have comparable capacity, and greater negative impacts. Nor is it necessarily a matter of adding the shortfall to the other 2 new communities, as higher figures are unlikely to be achievable. An even less attractive alternative would be to allocate land on the edge of existing settlements. One of the principal reasons for selecting the garden community strategy was to prevent more undesirable and damaging add-ons to Uttlesford and Braintree’s high-quality existing towns and villages. (PSLP180 Galliards/WYG) • We do take issue over the statement that the uncertainty regarding West of Braintree is negated by the increased lead-in time for development. The start date of 2025 is not agreed and in fact this trajectory had been put forward without reference to Galliard some time before the N Essex Plan Inspector’s Report was issued. Galliard’s consistent view is that development can commence in 2022 by which time the Inspector’s questions will have been answered. (PSLP180 Galliards/WYG) • What we do agree with is the statement that there could be an increase in speculative development that is not plan-led due to references to the ‘uncertainty’ over West of Braintree. This is not helped by having development beginning so much later in the trajectory compared to the other 2 garden communities. (PSLP180 Galliards/WYG) • Furthermore, we draw attention to the conclusion that all other options to varying extents or for different reasons are unsuitable and if adopted can be expected to lead to uncertain or negative overall impacts. (PSLP180 Galliards/WYG)
MODIFICATION REQUEST	<ul style="list-style-type: none"> •