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Uttlesford District Council

Chief Executive: Peter Holt

Local Plan Leadership Group

Date: Thursday, 10th November, 2022

Time: 7.30 pm

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

Chair: Councillor G Bagnall

Members: Councillors M Caton, J Evans, R Freeman, M Lemon, B Light,
J Lodge, S Merifield, R Pavitt (Vice-Chair), N Reeve, M Sutton and
M Tayler

Public Participation

At the start of the meeting there will be an opportunity for up to 10 members of the public to ask questions and make statements subject to having given notice by 2pm the working day before the meeting. Each speaker will have 4 minutes to make their statement. Please write to committee@uttlesford.gov.uk to register your intention to speak with Democratic Services.

Public speakers will be offered the opportunity for an officer to read out their questions or statement at the meeting, or to attend the meeting to readout their questions or statement themselves

Members of the public who would like to watch the meeting live can do so [here](#). The broadcast will be made available as soon as the meeting begins.

AGENDA

PART 1

Open to Public and Press

1 Apologies for Absence and Declarations of Interest

To receive any apologies and declarations of interest.

2 Minutes of the Previous Meeting

4 - 24

To consider the minutes from the following meetings:

- 9th March 2022
- 12th May 2022
- 10th October 2022 (Extraordinary Joint Session with Scrutiny Committee)

3 The Local Plan Challenge and Overview of Draft Plan Preparation Programme

25 - 26

To consider the challenge of preparing a local plan for Uttlesford and an outline of the programme and timetable to address this.

4 Written Methodologies for Site Availability Assessment (SLAA) and Site Selection Processes

27 - 76

To consider the two written methodologies for Site Availability Assessment (SLAA) and Site Selection Processes.

5 Upcoming Local Plan Team Publications

77 - 79

To note the upcoming Local Plan Team publications.

For information about this meeting please contact Democratic Services

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Agenda Item 2 Public Document Pack

LOCAL PLAN LEADERSHIP GROUP held at ZOOM on WEDNESDAY, 9 MARCH 2022 at 7.00 pm

Present: Councillor G Bagnall (Chair)
Councillors M Caton, R Freeman, M Lemon, B Light, J Lodge,
S Merifield, R Pavitt, N Reeve, M Sutton and M Tayler

Officers in attendance: C Edwards (Democratic Services Officer), J Hill (Planning Policy Officer) and S Miles (Local Plans and New Communities Manager).

Guest (non-voting): Councillor J Evans

Also present: Giles Tofield (Cultural Engine)

1 **APOLOGIES FOR ABSENCE AND DECLARATIONS OF INTEREST**

There were no apologies for absence. Councillor Lodge declared a non-pecuniary interest relating to item number 4, as a trustee of Saffron Hall and said he was also working with a Community Interest Company (CIC) at Fairycroft House.

2 **MINUTES OF THE PREVIOUS MEETING**

The minutes of the meeting held on 9 February 2022 were approved.

3 **SETTLEMENT HIERARCHY PAPER**

The Local Plan and New Communities Manager presented the report. He said the paper looked to identify the function of settlements within Uttlesford District Council (UDC) in terms of their size, form, economic and retail roles as well as the services and facilities available in the settlement. He said that the report was a snapshot in time.

He said that the purpose of identifying a settlement hierarchy was to inform the spatial strategy for the Local Plan, and ensure it focused on housing and economic growth in the most sustainable areas.

The key difference in the hierarchy from the withdrawn Local Plan to this emerging Local Plan was Stansted Mountfitchet's proposed classification in the top tier of the hierarchy.

The Local Plan and New Communities Manager agreed to look at and amend if necessary the following: -

- Page 13 1.7 – Harlow would be added as a nearby town.
- Page 17, 1.31 – rephrased to clarify the terms local rural centres and rural centres.
- Page 20 – The hotel in Great Chesterford was counted as a bar in the number of pubs within that area, however it was for guests only.
- Page 12, 1.1 would be looked at again and the paragraph expanded to explain the purpose and usage of the settlement hierarchy.
- Appendix 1, Hatfield Heath has 1 allotment not 2. The Post Office was closed, a van came for an hour a week. There was only 1 hourly bus route.
- Stebbing did not have an hourly bus service.

The following was also noted: -

The statement on page 13, 1.8 and 'the particular importance of London Stansted Airport and its role within the South Cambridgeshire research and bio-technology cluster'. The Local Plan and New Communities Manager said there was no specific evidence provided for who was using the airport, however a Business Survey had been carried out by the consultants working on the employment detail.

There was discussion about weighting as a way to determine where developments would occur on page 16, 1.24. The Local Plan and New Communities Manager said that this would not be based on a formulaic approach but would be looked at in a holistic way, considering all factors.

The Chair said that the decisions made could not be constrained by weighting, he said all the evidence and advice would be considered and Members would make a judgement and a final decision.

The Local Plan and New Communities Manager said that part of the purpose of the report was to help Members understand the professional Planning Officers expertise and knowledge. He said the judgements were then open for discussion and questioning. He said the purpose of the Leadership Group was to take the lead on the Local Plan and inform its development.

The Local Plan and New Communities Manager said that the report was a snapshot in time but significant changes to the data which were likely to result in a change to the hierarchy would be updated.

The Local Plan and New Communities Manager said he would make the changes and circulate an updated version.

CULTURE, CREATIVITY AND THE ARTS EVIDENCE BASE

The Planning Policy Officer introduced the item and said it provided a report and baseline database of venues and organisations within the district and formed part of the evidence for the Local Plan.

Giles Tofield from Cultural Engine presented the report. He said it showed the cultural and social infrastructure needs of the district and had wider implications for business development.

He said the database provided an insight into the main issues, opportunities and challenges relevant to the culture and arts.

Councillor Light said that on page 31, 1.2 the majority of cultural spaces were run on a voluntary basis, or were community led. She said that there needed to be a cohesive approach to the arts and more input from UDC with funding and support made available.

Councillor Caton said there were gaps in the provision of art and culture which were not highlighted. He said there was a need to look proactively at where the deficits were and how to rectify them.

Giles Tofield said that the cultural strategy would look in more detail at what residents wanted and the needs within each area.

Councillor Lodge said that the report noted at 10.2 and 17.7 that UDC gave almost no funding to the arts apart from to the Museum in Saffron Walden. He said that the Local Plan needed to drive forward investment.

He said that Fairycroft House run by a CIC and Essex County Council was a modern building and a large space which was not fully utilised.

Councillor Merifield said that any process of organisation of the arts should be looked at across the whole district and needed to be fair to all areas.

In response to a question from Councillor Merifield about historical societies, Giles Tofield said that he had engaged with the Recorders of Uttlesford History (RUH) and that they had an extensive network across the district that was often overlooked as an asset.

The Planning Policy Officer said that there was a potential role for the Council and an investment opportunity to boost the rural economy in terms of arts and culture.

Councillor Reeve said that a new website had been launched called 'Discover Uttlesford' which aimed to link retail, hospitality and tourism sectors across the district. He asked if the report could be updated to include this and correct the change of the website name.

In response to a question from Councillor Reeve about the cultural strategy, the Local Plan and New Communities Manager said that not all recommendations in

the report would be included in the Local Plan. He said the cultural strategy was a separate document that the Council, through the Economic Development and Communities team, would progress.

Giles Tofield said that he would make the changes relating to 'Discover Uttlesford', and he said that the baseline database had already been incorporated into the Local Plan.

Councillor Tayler said that the tourist information in the district was currently weak, and that it needed to be more co-ordinated, tourist friendly and welcoming.

5 **MOTION TO COUNCIL ON AN EVALUATION FRAMEWORK FOR THE LOCAL PLAN – DISCUSSION PAPER**

The Local Plan and New Communities Manager said that Full Council on 22 February had considered a motion for a possible evaluation framework for the Local Plan. The motion had been lost, but some members agreed with the sentiment. The Chair had asked that a paper be brought to this group to facilitate Member discussion.

He said the report reminded Members that the framework used by the Inspector examining the plan would relate to the National Planning Policy Framework (NPPF) and the associated soundness tests within.

He said that Members had already put together a draft vision and objectives which had been endorsed by Cabinet last year and could be used as a starting point.

Councillor Light said the purpose of the framework would be to consider the Local Plan in terms of green issues and ensure that it was environmentally sound. She said that this was in line with the NPPF, chapter 2 which highlighted 3 key issues, social progress, economic wellbeing and environmental protection. She said it was important to use experts and there were examples of organisations that had already produced frameworks that could be consulted.

The Chair said that the use of borrowed policies from other districts who had already developed a 'green' Local Plan would be useful as these had already been tested and proven and had supporting documentation.

The Local Plan and New Communities Manager said that they wanted to produce a 'green' Local Plan and asked that any examples of best practice from other Council's or policy areas that Members wanted to cover would be very useful.

In response to a question from Councillor Caton the Local Plan and New Communities Manager said that the policies would be monitored by having an annual Authority Monitoring report and within this, a new framework to monitor emerging policies from the new Local Plan. He said it would evolve over time and would include the development of supplementary planning documents

alongside the main documents within the Local Plan. He said these would be easier to update going forward.

Councillor Merifield said that it was important to keep to the Local Plan timescale and to ensure that the policies were acceptable to the NPPF and Inspectors.

The Chair said that the Local Plan needed to help to meet the net zero ambitions. He said that next steps would be discussed outside the meeting but background research from Councillors would be very helpful.

6 **FIRST HOMES PLANNING ADVISORY NOTE**

The Local Plan and New Communities Manager presented the report. He said that new government legislation which came into effect on the 28th March 2022 stated that 25% of affordable homes had to be first homes. He said they needed to be discounted by a minimum of 30% of market value, sold for no more than £250k and would only be available to eligible people. He said there would be restrictions to ensure that the discount was passed onto future purchasers. The implementation of the policy would be monitored. He recommended that the report was endorsed for approval at Cabinet.

The following was noted: -

- The new legislation related to any scheme that had an affordable homes element, so an application with 40% affordable homes would have 25% of that figure required as first homes.
- There was concern that the £250k limit would be difficult to reach because of the value of houses within the district. The Local Plan and New Communities Manager said that within the document, at 1.5, it stated that local authorities would be given discretion to require a higher minimum discount of either 40% or 50% if they could demonstrate the need.
- The Local Plan and New Communities Manager said that this was government legislation and had to be adopted, but there was some scope to have local eligibility criteria and some nuance could be added.
- Councillor Caton said that this reduced flexibility and created a problem as it would reduce the amount of shared ownership homes of 3 bedrooms and above.

The Local Plan and New Communities Manager clarified that it would be 25% of affordable homes secured. He suggested that it was monitored once there was a year's worth of data.

Councillor Evans said that these recommendations were based on the current position and suggested that additional work might be needed in the future with views taken from other local authorities and advice from the Local Government Association (LGA).

The Leadership Group recommended that the report went ahead to Cabinet and was reviewed in six months.

7 **AUTHORITY MONITORING REPORT**

The Local Plan and New Communities Manager presented the report. He said the report monitored progress against the targets within the policies from the 2005 Local Plan as well as other planning matters that the Council was required to monitor. It had not been produced since 2014 but would form a framework to allow for the report to be carried out on an annual basis and would consider the emerging Local Plan policies.

The Chair suggested that any comments were sent to the Local Plan and New Communities Manager outside of the meeting. He said it was a framework for the future and could be used to monitor the Local Plan going forward.

It was agreed that the report would be published once the Local Plan and New Communities Manager had received and reviewed any comments or questions from Members.

The meeting ended at 9.10 pm

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LOCAL PLAN LEADERSHIP GROUP held at ZOOM, on THURSDAY, 12 MAY 2022 at 7.00 pm

Present: Councillor R Pavitt
Councillors M Caton, R Freeman, M Lemon, B Light, J Lodge,
N Reeve, M Sutton and M Tayler

Guest (non-voting): Councillor J Evans

Officers in attendance: J Bennett (Principal Urban Designer), L Bowser (Principal Community Infrastructure Planner), H Coles (Local Plan and New Communities Project Officer), T Coleman (Interim Planning Director), C Edwards (Democratic Services Officer), P Holt (Chief Executive) and S Miles (Local Plan and New Communities Manager).

Public Speaker: A Dodsley

1 PUBLIC SPEAKING

Mr Dodsley said he was concerned about the reduced information and lack of access to the Local Plan process since last year. Mr Dodsley said that there had only been two Local Plan Leadership Group (LPLG) meetings in the last six months and it had been impossible for stakeholders across the district to follow the development of the evidence base.

Mr Dodsley said that the following reports had been expected but not yet been brought to any meetings: -

- Phase 2 assessment (Heritage Assets around new settlements)
- Phase 3 assessment (Heritage Assets around allocations in villages)
- Phase 3 Landscape report

Mr Dodsley said that questions raised in relation to the Landscape Sensitivity reports and a letter sent on the 8th of December by Richard Buxton Solicitors had never been answered. Mr Dodsley said it was unclear if these critical inputs had been fed into the assessments of the preferred options.

Mr Dodsley wanted confirmation that:-

- Some oversight had taken place by Councillors during the development of the evidence base
- The evidence had not just been used to meet a pre-determined strategy as it was in the last iteration of the local plan.
- That the comments of both the previous inspectors and Historic England on the Easton Park proposal in the withdrawn Local Plan had been

respected and accepted in the development of the new Local Plan Strategy.

The Local Plan and New Communities Manager made the following points in reply to Mr Dodsley:-

- Phases two and three of the Heritage assessments had been received in draft form and were being used to inform the site assessment and selection.
- Phase three Landscape report had been received in draft and was also being used in the same way.
- Landscape and Heritage consultants had been asked to produce notes in response to the questions raised and these would be available at the next LPLG meeting.
- All the documents relating to the Local Plan would be produced and uploaded to the database once they had been brought to the LPLG.
- No decisions regarding the Local Plan preferred options had yet been made.

2 APOLOGIES FOR ABSENCE AND DECLARATIONS OF INTEREST

Apologies were received from Councillors Bagnall and Merifeld.

3 AN INTRODUCTION TO THE DRAFT LOCAL PLAN POLICY DOCUMENTS

The Local Plan and New Communities Manager said that the draft policy chapters for the Local Plan would be presented to the meeting. Transport and Movement was excluded and some chapters had certain parts omitted when they referred to specific sites. These would be brought to the next meeting.

The Local Plan and New Communities Manager recommended that Members:-

- Considered the draft policy chapters for the emerging Local Plan.
- Recommended the chapters onto Cabinet.
- Amendments that were suggested to the draft chapters would be considered and changed unless there was not a consensus. Where this happened the differences would be highlighted in the report to Cabinet and agreed with the Portfolio Holder.
- There would be a schedule of changes to keep a record of the amendments made.

4 DRAFT LOCAL PLAN INTRODUCTION CHAPTER

The Local Plan and New Communities Manager introduced the item and said it provided a general introduction and a discussion on the consultation arrangements.

In response to Members comments the Local Plan and New Communities Manager made the following points:-

- In the document where reference had been made to the Council's declaration of a 'climate change and ecological emergency' the specific wording from the motion had been used otherwise it was referred to as 'climate change' but he agreed that it would be a good idea to be consistent.
- Repetition and continuity of voice would be looked at again and in the final format the page numbering would be resolved.
- The vision and objectives of the Local Plan were not in the introduction as it did not cover policy wording, it would be in the Spatial Strategy which would be brought to the next meeting.
- The number of people who engaged with the Community Stakeholder forums would be circulated.
- On page 17 the wording around 'environmental assets' in terms of specifying a reference to food security and proper land use would be looked at again.
- The community stakeholder forum model would be used to involve and engage residents in the site selection and design work.

The Principal Community Infrastructure Planner added the following points:-

- The references to 'productive' agricultural land (which was the food element) were included within the policies and could be extracted and highlighted.
- There were also references to collaborative working with Land Owners and Farmers to find agreement relating to how land was managed from a climate change perspective.
- Both of the above could be picked out of the document, circulated and strengthened if required.
- On page 19 the use of the phrase 'net zero ready' related to new builds and had been added to allow for advances in technology over the life of the Local Plan.

Councillor Reeve said that he was concerned with the use of language within the policies including 'must', 'shall', 'should' and said he would like further discussion with the Local Plan and New Communities Manager outside of the meeting.

In response to a question from Councillor Reeve who said that roads and utilities were nearing capacity limit within the district so how they would cope with the new building and growth. The Local Plan and New Communities Manager said that they would work together with the Utilities companies to understand the growth and the challenges so that they could plan to meet the needs of the district.

The Chair said that there was presentational work to be done on the document so that the public could really understand it better.

CLIMATE CHANGE CHAPTER

The Principal Community Infrastructure Planner introduced the chapter and went through the various studies that had been carried out and used as evidence. There would be further policies brought to the next meeting including water proposals, which followed on from studies on flood risk and the water cycle, and a renewable energy strategy.

The Principal Community Infrastructure Planner said that there was an emerging policy on chalk streams and their protection.

Councillor Caton said he was concerned about the targets on page 17 that the Essex Climate Action Commission (ECAC) seemed to be making and did not think that it gave scope for Uttlesford District Council to adopt what they wanted and differentiate from the rest of Essex. The Principal Community Infrastructure Planner said the targets were there to inform and advise, they were not statutory and the intention was to be supportive. The wording could be looked at and amended.

The Principal Community Infrastructure Planner said there was a separate policy on solar farms which provided more detail on the protection of agriculture proposed.

The Chair thought that cross referencing needed to be applied as some of the introductions drew conclusions which were not intended if the document was read in more detail.

Members made the following comments: -

- On Pages 31 and 50 the phrases 'chalk stream zone' and 'chalk protection zones' were used, these needed to be explained and differentiated.
- The statement on page 51 regarding 'storm overflows' was misleading as the report quoted there were only 12 in the district and it was likely there were a lot more.
- On page 70, CC15, could S106 monies be used for the creation of an additional district park and could the addition of 'orchards and fruit trees' be included in that section.

In response to Members comments the Principal Community Infrastructure Planner made the following points: -

- The map on page 57 would be reviewed and the chalk streams better defined. The Chair suggested that the Rivers Trust would be able to define exactly where they were in the district.
- On page 34 the reference to 'no fossil fuel' being used in new homes had been included to aim for the highest standards possible, with the additional understanding that natural gas would not be allowed by 2025.

- The Sustainable Development Accreditation Scheme was currently just an idea and needed more work as to how it would be administered and what resources would be required to do this. Members said that it should be mandatory.

The Local Plan and New Communities Manager said:-

- The reference on page 40 to the need for 3% of agricultural land in the district to become solar farms was not a proposal and was intended to be illustrative, the statement would be amended to make it clearer.
- If the evidence was there a statement could be made to the effect that unless water supply was improved the amount of development would be affected.

6 **PROTECTING AND ENHANCING UTTLESFORD CHAPTER**

The Principal Urban Designer introduced the chapter and said it set out the specific elements and evidence base in order to protect and enhance the environment, landscape, rural nature and heritage of the district.

The Principal Urban Designer said it would inform how development was taken forward. The chapter set out the work that developers and applicants would need to do in response to these heritage and landscape assets as well as what the Council would be doing including the setting of design codes.

Officers made the following comments in response to Members questions:-

- The statement on the Air Quality Management Area (AQMA) would be made clearer.
- The 'Valued Landscapes' within the district were mentioned in the Landscape Character introduction section and the Landscape Sensitivity Evidence Base should also specify these 'Valued Landscapes'.
- The Controlled Parking Zones (CPZ) policy would be included in the Spatial Strategy.

Members made the following comments:-

- Neighbourhood Plans needed to be incorporated into this chapter as they had little mention.
- The need for increased density of housing, especially smaller units, to enable public transport to be made viable.

7 **DELIVERING JOBS AND SUPPORTING A VIBRANT ECONOMY CHAPTER**

The Local Plan and New Communities Manager presented the chapter and said that the policies within it sought to ensure that the supporting policy framework allowed for business growth while protecting existing employment uses.

The Local Plan and New Communities Manager apologised that on page 119 the map was covering the text, a new version would be circulated.

Councillor Caton stressed the importance of not just the airport but the vibrant areas around the airport for business/industrial parks and logistics. In response, the Local Plan and New Communities Manager said that he would look at the wording to include reference to the proximity to the road network around the M11 at junction 8 which generated employment from businesses including logistics companies.

Councillor Pavitt acknowledged Stansted and Chesterford Research Park (CRP) as key drivers in the economy and asked if consideration had been given to create more science space beyond CRP, with access to the A11. Further information is included in the full chapter, not yet published.

8 **HOUSING CHAPTER**

The Local Plan and New Communities Manager introduced the chapter and said it covered a number of different aspects of Housing.

The Local Plan and New Communities Manager said it did not cover a policy on first homes which would be drafted and there would be more detail regarding housing for the elderly.

In response to a question from Councillor Reeve, the Local Plan and New Communities Manager agreed to look into a policy which would enable S106 monies from larger sites to be used to acquire land for Social Housing.

9 **PROVISION OF SERVICES AND FACILITIES CHAPTER**

The Local Plan and New Communities Manager presented the chapter and said it covered policies on retail provision, education and skills, health and wellbeing, communities and cultural facilities and open space.

The Local Plan and New Communities Manager responded to Members questions:-

- On page 177, paragraph vi - the source of the statement would be checked as well as its validity.
- The Local Plan could have an appropriate policy to support car parking for existing surgeries and town centres and if there was an appropriate site it could be allocated, but he was not sure if this fitted in with the Climate Change policy.
- The open space sports and recreational facilities deficits within the district had not been included, these would be looked at again.
- The Cultural Strategy would follow but there was no fixed timescale.
- A mistake on page 158, paragraph 57 regarding the Stansted Mountfitchet Castle being included in the list of Saffron Walden key destinations was noted.

- The Sustainable Drainage System (SUDS) policy would be looked at again in more detail along with the concept of the dual use of land by combining SUDS with playgrounds.
- The definition of the term 'Carbon Net Zero' would change over the life of the Local Plan, the suggestion that a phrase be added to make this clear was agreed.

10 **INFRASTRUCTURE CHAPTER**

The Local Plan and New Communities Manager agreed that there should be a policy regarding polluted water flow from the roads into the rivers. The Local Plan would not be able to ask developers to fix existing problems but could set objectives to make sure it did not get worse. The option of a green soak away was also raised.

11 **DELIVERING AND MONITORING THE LOCAL PLAN CHAPTER**

No comments were made on this chapter.

12 **DEVELOPMENT DESIGN STANDARDS**

The Local Plan and New Communities Manager said that solar optimisation was included in policy D2 on page 89 but could be looked at in more detail.

The Principal Urban Designer said that the detailed design of materials used for curb stones and surface materials could be included.

The Local Plan and New Communities Manager welcomed any further input to him via e-mail by Wednesday 18th May.

The Local Plan and New Communities Manager said that he would be aiming for the text to be right for the regulation 18 consultation but other amendments could still be made.

The Local Plan and New Communities Manager said there was a Council endorsed version of the 'Building for a Healthy Life' document and this should be used for new planning applications.

The Chair said that he thought it would be a good idea to hire an external editor to ensure continuity of voice, presentation and to make it as accessible as possible to residents.

Councillor Light voted against the recommendation in the report and said she did not think that the Local Plan was ready for the consultation stage.

RESOLVED: To recommend the chapters onto to Cabinet with the additional amendments and comments from the meeting and the inclusion of those which would be sent directly to the Local Plan and New Communities Manager, with one noted dissension.

The meeting ended at 9:10pm

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LOCAL PLAN LEADERSHIP GROUP: EXTRAORDINARY JOINT SESSION WITH THE SCRUTINY COMMITTEE held at COUNCIL CHAMBER - COUNCIL OFFICES, LONDON ROAD, SAFFRON WALDEN, CB11 4ER, on MONDAY, 10 OCTOBER 2022 at 7.00 pm

Present: Councillor G Bagnall (Chair)
Councillors M Caton, M Lemon, B Light, J Lodge, R Pavitt (Vice-Chair), N Reeve, M Sutton and M Tayler

Guests (Scrutiny Committee): Councillor N Gregory (Chair)
Councillors G Driscoll, V Isham, R Jones, G LeCount (Vice-Chair) and G Sell

Guests (non-voting): Councillors J Evans and P Lees

Officers in attendance: J Clements (Interim Local Plan and New Communities Manager), C Edwards (Democratic Services Officer), D Hermitage (Director of Planning), P Holt (Chief Executive) and C Shanley-Grozavu (Democratic Services Officer)

Public Speakers: P Bright, A Dodsley, Councillor M Foley, R Haynes

13 PUBLIC SPEAKERS

Councillor Martin Foley, Mr Richard Haynes, Mr Andy Dodsley and Mr Peter Bright addressed the meeting. Summaries of their statements have been appended to these minutes.

14 APOLOGIES FOR ABSENCE AND DECLARATIONS OF INTEREST

Apologies for absence were received from Councillors Freeman, Criscione, Luck and Merifield.

There were no declarations of interest.

15 LOCAL DEVELOPMENT SCHEME (LOCAL PLAN REGULATION 18 CONSULTATION)

The Director of Planning introduced the report on the Local Development Scheme (LDS) which set out an amended draft timetable for the emerging Local Plan, following the recent announcement of a delay in the document's production.

The Director of Planning said it had been confirmed that the Council was due to consult on its Regulation 18 "Preferred Options" document in November 2022, however senior officers identified shortcomings in the draft in September, when it was due to be published for consideration in the governance process. The Chief

Executive added that he had been informed of the issues in the previous week and, once a decision was made to withdraw the document, Party Leaders were briefed on the following Tuesday morning and a press release was published on the Tuesday afternoon. During this period, there were no committees scheduled that an urgent decision could have been brought to.

The Director of Planning said that the delay was not due to the work not being done, but rather that the document was not robust enough for consultation. He said this was due to various reasons including a lack of integration between different workstreams, ineffective engagement with members, a significant loss of local knowledge from the high turnover of staff and a lack of clarity in thinking as a whole.

Members discussed their concerns regarding the announcement of a short postponement to the Local Plan and agreed that proper process needed to be put in place to consider the lessons learnt. The following was noted:

- Some members said that it was undemocratic of the Chief Executive to have made the decision to withdraw the papers without proper consultation. They also felt unhappy that the opposition leaders were given very little time to digest the brief and many members were informed of the decision at the same time as the public when the press release was published. In response, the Chair apologised and said that the timeframe between the shortcomings coming to his attention and the decision being announced to the public was extremely small.
- Members expressed concerns around the late discovery of the delay in the consultation document especially given the frequent, positive updates received by both committees, a review by an Independent Person and the LPLG being presented with half of the draft plan which members felt broadly made sense.
- There was a failure of accountability to the LPLG and Scrutiny Committees, as LPLG had not met for 6 months, and Scrutiny had not been provided with enough opportunity to identify problems in the evidence early on. Democratic accountability appeared to be through briefings with the LPLG Chair and relevant Portfolio Holder.
- The high staff turnover was particularly troubling, given that there remained the need for a stable team in order for the Local Plan process to work.

In response to further members questions about the new Local Development Scheme, officers clarified the following:

- The Local Plan team would not be restarting the process from scratch and their priority was to reevaluate the evidence base and proposals in order to identify anything deemed inadequate or unrobust. They explained that to increase the chances of the plan being successful, the documents needed to be as robust as possible.
- The Interim Local Plan and New Communities Manager would take on the responsibility of Project Manager and would be supported by an existing Project Officer. Under the new arrangements, there would be more extensive reporting to the new Director of Planning and committees to ensure members were informed of the up to date position of the plan's development.

- The Director of Planning would review the salaries and job descriptions of key posts in the Local Plan team with the hope that improvements would be made to encourage more permanent, long-term staffing arrangements.
- In order for the draft Regulation 18 documents to be put out for consultation before the pre-election period (known as purdah), it would have needed to be published by 9th February 2023 which in turn would require its approval through the governance cycle in December 2022. Officers felt that this was not enough time to conduct the work required to produce a robust consultation so decided to consult after the Local Elections in May 2023.
- The timeline within the LDS had factored in the impact which the 2023 Local Election may have on Council and committee membership. There would be 10 weeks between the election and the Regulation 18 consultation, during which time the LPLG would be briefed on the final draft and any new members brought up to speed before the formal governance process began.
- Officers highlighted that the consultation would last for 6 weeks and would run from late August into September. The exercise was to encourage feedback from interested parties such as the public and Parish Councils and no final decisions on the emerging Local Plan would have been made by that point.

The Chair proposed that the votes would be cast for both recommendations at the same time and invited members from the LPLG and Scrutiny to vote.

All members voted in favour of the recommendations, except for Councillors Caton and Sell who registered their abstention.

RESOLVED:

1. To recommend that Cabinet adopts the revised LDS of the Local Plan.
2. To agree a new, closer alignment of LPLG/Scrutiny Committee oversight of the Local Plan process, with details to be discussed between the chairs.

APPENDIX: PUBLIC SPEAKERS

Councillor Martin Foley, Member for Thaxted and the Eastons

“So, we have paused. The risks are far higher if we have another failed plan than there would be with a pause; that’s as I understand it. Together with 20 other Councils, we have paused the Local Plan and for a good reason.

Some of us knew that difficulties lay ahead and warned. We knew because answers from past officers were either delayed or even ignored. That, I’m happy to say, is not the case now and I’m very pleased with the more open approach.

What has clearly changed, I hope, is a more forensic view of evidence and how that could be moved forward onto the new plan. Of the 18 Parish Councils that I visit, it’s interesting that every week some Parish Council tells me about their concerns about losing their pub, or a post-office or local shop. So, I hope, as we move that can be taken into consideration too; in strengthening some communities, rather than putting everything all in the one place.”

Mr Richard Haynes

“My name is Richard Haynes. I am a Trustee of CPRE.

Since there had been no LPLG meeting, and hence no public scrutiny of the Plan development process for many months we submitted a Freedom of Information request to obtain some background on the work being carried out. Nothing has yet been received so I am working slightly in the dark but it is quite clear that things have definitely gone awry.

The process started well with the setting up of the Community Forum which I was a member of but it became apparent that things were going wrong when the landscape and heritage studies were published. Although comprehensive documents, they both had serious deficiencies. The Landscape study failed to provide any assessment of any key views within the District. The consultants apparently said that officers hadn’t asked for it but this is a critical element of any Landscape character assessment.

While the heritage study then provided a very comprehensive list of the statutorily designated heritage assets in the District (something which frankly, was always available elsewhere) it failed to provide any commentary on the extent of the setting of those assets, something which is essential when considering the likely impact of development and something which has warranted the publication of a considerable amount of guidance from Historic England.

A further concern then emerged when the preliminary assessment of the sites submitted as a part of the ‘Call for Sites’ process was sent to the parishes. Whilst the criteria used related to policies in the 2005 adopted Local Plan, no attempt had been made to judge each site against policies in, and evidence associated

with, Neighbourhood Plans, several of which were already adopted documents. As an illustration the Landscape study for the Thaxted NP had identified 45 key views within which development would cause serious harm – this offered far more guidance as to the appropriateness of development in a landscape context than the UDC commissioned study by LUC. Similarly, as a result of ignoring neighbourhood plans no specific local knowledge was ever considered in relation to local community aspirations, existing community facilities or critical constraints such as localised flood risk.

Anyway, it now appears that we are back where we started with a huge housing allocation entirely in the wrong place!

When the Community Forum looked at the subject of transport and the location of any new settlements, we all agreed that any major new housing development had to be in close proximity to railway stations and other transport hubs which clearly meant development in the west of the District. It seems now that this is being totally ignored on the basis that a new rapid transport link could be provided for Easton Park. You may recall that one of the key deficiencies of the previous plan identified by the inspectors was the uncertainty over the cost, viability and deliverability of a rapid transport link. So, what have officers and their consultants now magicked up that will get the approval of a different EIP inspector. If they are thinking of a bus service along the A120 what use will that be when it grinds to a halt at the M11 junction – hardly ‘rapid-transport’. In fact, LUC recognise in their infrastructure report that development at Ugley or Chesterford would be far more sensible because of proximity to railway stations, why therefore rely on a wholly uncertain new piece of infrastructure.

For my final point though, I would just like to pose as a question. Are we sure that we should still be working towards a target of 706 dwellings per annum? You may be aware that Ashfield Council (another council under independent control) have stalled their Local Plan specifically because of uncertainty over the housing requirement and the use of the ‘standard method’. Following Liz Truss’s reference to ‘Whitehall-inspired Stalinist housing targets’ the Department for Levelling up have now admitted that they no longer know whether 300,000 dwellings a year is a government target throwing the whole standard formula into doubt yet again.

I certainly welcome the proposal now for a delay to the Local Plan process but can we please make absolutely certain that the previously calculated housing target is still applicable. It would be very upsetting for local residents to find that Uttlesford was spending another £3 million planning for far more inappropriately located houses than are actually needed.”

Mr Andy Dodsley

“The proposal to delay the production of Regulation 18 until 2023 is a sensible decision to anyone who has been closely following the progress of the local plan. It has been clear for a while that the evidence base was not in a fit and proper state with the startling revelation by officers at the May LPLG that the now aborted draft plan had been drawn up without key Heritage and Landscape reports being available for scrutiny by the public or the LPLG. The decision-

makers should be applauded for their courage in taking a difficult decision that they knew would not be well received.

We welcome the fact that the site selection process will be re-run to more rigorous standards. The agenda pack report highlights the concerns and issues with the previous site selection process - particularly the lack of transparency around the outcome of the issues and options stage, the spatial strategy and the development of site options.

Little Easton Parish Council still have multiple unanswered questions and issues with the site technical consultations from last year as officers at the time were unwilling to discuss them with the council. We look forward to the opportunity for some engagement with current officers to resolve these issues.

We can only hope that the next iteration of the draft plan is truly a fresh approach and not another re-hash of previous failed proposals. It is the district's worst kept secret that this is what was going to be proposed.

We also welcome the fact that UDC wish to have more effective engagement with the public. This engagement has been sadly lacking over the last 12 months with just a minimal number of local plan meetings this year accessible to the public, making it difficult for the community to follow the progress of the plan and particularly the development of the evidence base. It is also difficult to see where the community input obtained from the much-lauded Community Stakeholder Forums during the issues and options stage was fed into the draft plan. One hopes it wasn't just window dressing.

In terms of sustainable options, we would encourage you all to read the Chartered Institute of Highways and Transportation's excellent 2019 paper and their advice that "Development needs to be focused on where transport infrastructure and services already exist rather than on new infrastructure to support remote locations". Any spatial strategy that does not make maximum use of the railway line running the length of the district to the west is clearly a nonsense.

Given the Council Leader's recent statement that the local plan needs to "protect the unique local character of our beautiful and historic district", we will also expect the draft plan to have a robust evidence base that truly and honestly responds to any constraints detailed in Heritage, Landscape and Biodiversity assessments rather than attempting to ignore or play down any impacts. It is in all our interests for the council to produce an effective local plan and end the burden of speculative applications and appeals currently afflicting the district. We look forward to being able to support a plan that is truly objective, sustainable and equitable across the district and that can be justified to both the community and the planning inspectors."

Mr Peter Bright

"My name is Peter Bright. I have been a resident of Little Easton for 16 years and founder member of Stop Easton Park. However, tonight I speak solely as a resident.

I retired nine years ago after working in the City for over thirty years as a technology projects manager.

I live-viewed the Scrutiny meeting of 22nd September and noted the comments of those present. What transpired (issues in communication, lack of insight, surprise and uncertainty) didn't shock me as an ex-project manager BUT, as a resident, the comments were alarming inasmuch that they displayed a disconnect between Officers working on the Local Plan and Councillors who were overseeing it. Following the failure to get Inspector approval for the two preceding Local Plans, the residents I know that take an interest in the Local Plan are frustrated that this third iteration is headed the same way with the same ideas. Additionally, costs are mounting with a distant but looming threat of central government ultimately taking control of the process.

Now, I don't criticise without knowing the facts. I'm not at the coalface, so I don't know the day-to-day difficulties encountered. Nor can any criticism be made of new management recently assigned to the Local Plan. They can only report on what they have found. Repeated criticism without specifics doesn't help. It only demotivates. I note the candour displayed by Messrs Hermitage and Clements in tonight's Reports Pack. The recommended Changes in Approach gives me confidence that they know what needs to be done. Therefore, I fully support both of their recommendations.

But I'd also keep in mind two points:

First - I hope what was said at the last Scrutiny meeting and at tonight's meeting will exorcise any lingering concerns Members and Officers have about communicating progress. Being honest about progress should result in difficult issues identified, shared and solutions promptly found. There MUST be a NO SURPRISES culture.

Second - I request frequent communication goes further than the council chamber. There have been too many long periods of silence where Parish Councils, action groups like Stop Easton Park and the public have no idea whether the Local Plan is on target or not. Perfectly valid requests and questions from those bodies have also been left unanswered and, ostensibly, ignored. You need to get the community on-side as part of the process and not as an irritant cast to one side if you don't like what is being mooted.

This is not the time for game-playing or points-scoring between local political parties. We can feel mad at central government dictating an absurdly high number of houses built in one of the smallest districts in the country. But short of fighting central government I'd like to see ALL Councillors of ALL parties pull together, not making the same mistakes so glaringly obvious in previous local plans, and get the new plan over the line.

I will continue to take a keen interest. Thank you for listening to my comments and I look forward to improved communication from all sides."

Agenda Item 3

Committee: Local Plan Leadership Group

Date: 10 Nov 2022

Title: The Local Plan Challenge, and Overview of Draft Plan Preparation Programme.

Report Author: John Clements, Interim Local Plans and New Communities Manager
JClements@uttlesford.gov.uk

Summary

1. The Interim Local Plans and New Communities Manager will give a verbal presentation at the meeting, supported by Powerpoint slides, on
 - a. The challenge of preparing a local plan for Uttlesford, and
 - b. An outline of the programme and timetable for the preparation of the Draft Local Plan to be published in summer 2023, and the sequence of Local Plan Leadership Group and Working Group meetings which will engage with and inform that work.
2. It is intended this will help inform Members, and offer a basis for discussion and feedback to officers.

Recommendations

3. That the Leadership Group notes content of the presentation, and provides and feedback to officers it may wish.

Financial Implications

4. None.

Background Papers

5. None

Impact

- 6.

Communication/Consultation	n/a
Community Safety	n/a
Equalities	n/a
Health and Safety	n/a

Human Rights/Legal Implications	n/a
Sustainability	n/a
Ward-specific impacts	n/a
Workforce/Workplace	n/a

Risk Analysis

7.

Risk	Likelihood	Impact	Mitigating actions
1	1	1	1

1 = Little or no risk or impact

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

3 = Significant risk or impact – action required

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

Committee: Local Plan Leadership Group

Date: 10 Nov 2022

Title: Written Methodologies for Site Availability Assessment (SLAA) and Site Selection Processes

Report Author: Jessica Dewar, Interim Principal Local Plans and New Communities Officer
JDewar@uttlesford.gov.uk

Summary

1. This Report introduces and presents two key documents which are intended to provide robust methods for two key Local Plan preparation stages - successive but very different in purpose – in identifying and considering sites for potential development.

Recommendations

2. That the Leadership Group notes the two Written Methodologies, and the greater clarity and robustness these will provide to the treatment of potential sites in the development of the Local Plan options and proposals.

Financial Implications

3. None.

Background Papers

4. The following papers were referred to by the author in the preparation of this report and are available for inspection from the author of the report.
 - a. SLAA Report presented to LPLG 29 April 2021
 - b. Development Options Process presented to LPLG November 2021

Impact

- 5.

Communication/Consultation	n/a
Community Safety	n/a
Equalities	n/a
Health and Safety	n/a
Human Rights/Legal	n/a

Implications	
Sustainability	The Written Methodologies reflect the Strategic Environmental Assessment and Sustainability Appraisal which are an integral and obligatory part of the plan-making process.
Ward-specific impacts	n/a
Workforce/Workplace	n/a

Situation

Site Assessment Process

6. The revised Local Plan preparation timetable has been amended (and reflected in a revised Local Development Scheme to be published shortly) in order to undertake further work on the Draft Local Plan and focus on the supporting evidence and justification of potential allocations within the Local Plan. In this the Local Plans team is responding to concerns from members, officers, parish councils and others about the robustness of the process to date, and a need, and some specific requests, for greater clarity about where we are now in the process and how it will proceed henceforth in moving towards potential allocations within the Local Plan.
7. In order to ensure this is a robust and transparent process, and that the different officers working on it are following the same procedures, Written Methodologies have been prepared for two key and distinct stages of considering sites for potential inclusion in the emerging plan.
8. There had been Reports to LPLG on these two stages previously (see Background Papers, above) previously, but with the benefit of hindsight the first on these (on the SLAA, see below) was rather confusing and didn't address all elements of national guidance on the matter, and it may also have been the case that with the rapid changeover in Local Plans team staff practice deviated somewhat from this; and the second (on the Site Selection process, see below) didn't provide any explanation of the process to be undertaken.

Strategic Land Availability Assessment Methodology

9. The Strategic Land Availability Assessment (SLAA) is, in short, a land 'bank' or supply of sites which are available within the district to inform an assessment of land supply or choices of sites which are deliverable for potential allocation. National Planning Guidance states that this land supply can be sourced from the Call for Sites, existing planning permissions, brownfield land registers, Council owned sites, neighbourhood plan allocations or from actively looking for sites by the Council.

10. The previous SLAA was consulted on in November 2021 as part of the SLAA Technical Consultation, a summary of the comments received is in Appendix D of the report and these comments have resulted in an updated SLAA Methodology to robustly assess the sites consistently and in line with National Planning Guidance.
11. It is important to note that the SLAA does not have any planning weight and just because a site is included within a SLAA it does not mean the site will be allocated in the Local Plan. The SLAA does not consider emerging Local Plan aspirations, policies or planning constraints such as Greenbelt or the Countryside Protection Zone, that later, separate assessment is part of the Site Selection Methodology assessment of sites set out immediately following.
12. A new Written Strategic Land Availability Assessment (SLAA) Methodology has been completed and is already in use by the Local Plans team. This forms Appendix 2 to this Report.

Draft Site Selection Methodology

13. Clarity has been sought as to how sites have been assessed from being within a supply of sites to the potential allocations. The Local Plan work going forward will benefit from in a clear, staged process of the assessment of sites.
14. Previously, Local Plan Leadership Group have been presented with the 'Development Options Process', however how the chosen sites have been through a filter process of what sites are chosen from the supply of sites (SLAA) to the potential allocations stage is not explicit nor has this been justified through a clear process.
15. The Draft Site Selection Methodology (see Appendix 2 to this Report) shows how it is intended to assess the sites against Local Plan aspirations, policies, planning constraints and Sustainability Appraisal objectives. Thus, each site will have an individual site assessment setting out the justification for proposing to allocate or not resulting in a final list of recommended potential allocations to be considered by members in May 2023 and consulted on as part of the Draft Local Plan (Regulation 18) consultation in Summer 2023.

Risk Analysis

16.

Risk	Likelihood	Impact	Mitigating actions
1	1	1	1

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.



Strategic Land Availability Assessment (SLAA)

Methodology

November 2022

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Revision history

Revision	Revision date	Details
1	29 April 2021	Local Plan Leadership Group (29 April 2021)
2	31 st October 2022	Changes and further detail to support commencement of site assessments following the comments received through the SLAA Technical Consultation

1. INTRODUCTION

1.1 The purpose of the Strategic Land Availability Assessment (SLAA) is to identify a future potential supply of land which is suitable, available and achievable for housing and economic development uses over the plan period.

1.2 The assessment does not in itself determine whether a site should be allocated for development. It is important to appreciate that this is not the selection of sites for allocation, which will come later and involve a deeper consideration of a range of factors, but to identify which sites are and are not available for potential allocation.

1.3 The decisions regarding which sites will be proposed for allocation will be made in the emerging Uttlesford Local Plan (and neighbourhood plans) which will be subject to full public consultation and examination before any site or plan is adopted. (In the case of the Uttlesford Local Plan the District Council's provisional choices of allocations will be published in the Consultation Draft Local Plan in Summer 2023.)

1.4 The role of the SLAA is to provide information on the range of sites which are available to meet the local authority's requirements and to inform plan-making and decision-taking, including:

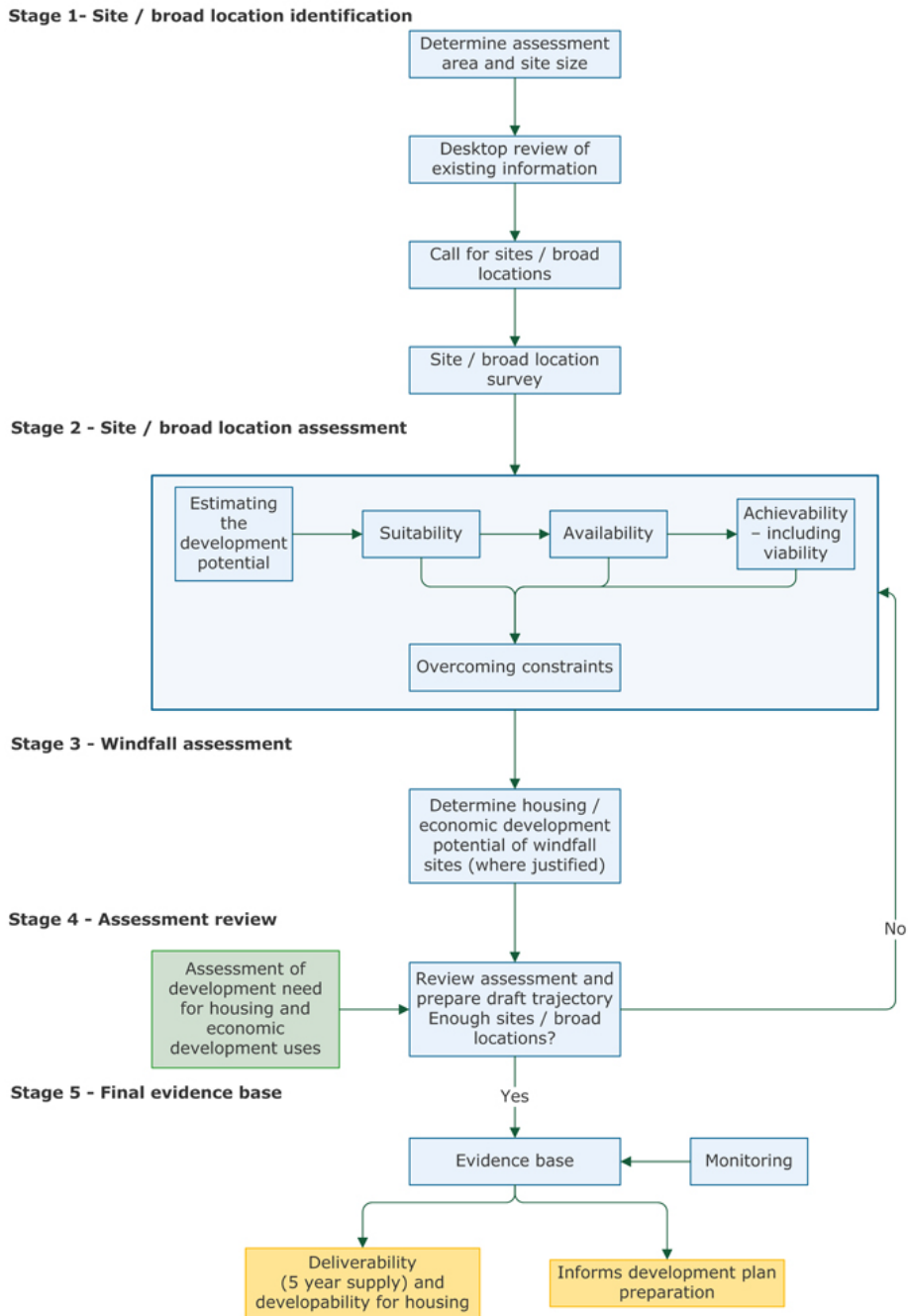
- Gaining an understanding of the land available for future residential or employment development
- Enabling the Council make informed decisions of where to allocate future development; and
- Informing housing and employment trajectories, including specific deliverable sites for years 1-5 of the plan period, and specific deliverable sites or broad locations for growth for periods 6-10 and 11-15 of the plan.

1.5 The National Planning Policy Framework (NPPF) describes how planning authorities should build a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment¹. Detailed guidance is set out in the Planning Practice Guidance (PPG), which clarifies that the process applies to economic land in addition to housing land. In issuing its call for sites, the Council made it clear that sites are sought for the full range of uses – including 'green sites' which may have benefits in terms of accessible open space, biodiversity gains and/or carbon absorption.

1.6 The land availability assessment methodology set out in the PPG is summarised in the flowchart reproduced below.

¹ NPPF (2021) paragraph 68

Uttlesford Strategic Land Availability Assessment (SLAA)



1.7 This document describes the Council’s methodology, which is structured according to the guidance in the PPG.

1.8 As explained in the NPPF, the SLAA does not in itself determine whether a site should be allocated for development. It is the role of the SLAA to provide information on the range of sites which are available to meet the local authority’s requirements, but it is for the development plan to determine which of those sites are the most suitable to meet those requirements. A separate topic paper will bring together the SLAA, Sustainability Appraisal and other evidence and set out why sites are included or excluded in the draft Local Plan.

Stakeholders

1.9 The SLAA will be carried out with the involvement of a wide range of stakeholders, and in accordance with the statutory duty to cooperate². The stakeholders will include but not necessarily be limited to the following:

- Environment Agency
- Historic England
- Natural England
- Civil Aviation Authority
- Homes England
- Clinical Commissioning Group
- NHS Commissioning Board
- Office of Rail Regulation
- Integrated Transport Authority
- Highway authority
- Local Enterprise Partnerships
- Local planning authorities in the housing market area
- Local planning authorities in the functional economic market area
- Landowners and promoters
- Local property agents
- Developers
- Local communities
- Businesses and their local representative organisations
- Parish and town councils
- Neighbourhood forums preparing neighbourhood plans

1.10 All stakeholders will be invited to comment on the final SLAA, which will be published alongside the Draft Local Plan (Regulation 18) consultation in Summer 2023.

SLAA Technical Consultation Overview

1.11 The SLAA Technical Consultation was undertaken as an optional consultation (i.e. not required by Government regulations), the reasons for the technical consultation are set out below. The consultation took place between 18 October 2021 and 29 November 2021. The invitation to participate and consultation brief is shown in Appendix C.

1.12 The objectives of the SLAA Technical Consultation were:

- To review the plotted site boundaries
- To fact-check the key attributes of the sites detailed in the Site Proformas, resulting from our desktop analysis.

1.13 Parish and Town Councils and site owners/promoters were consulted in this SLAA Technical Consultation. They were asked to fact check sites included in our Site Proforma (151021). Sites are coded by Parish and suffix, according to proposed use:

- Residential (RES)

² As set out in The Town and Country Planning (Local Planning) (England) Regulations 2012

- Employment (EMP)
- Community (COM)
- Mixed use (MIX)
- Other (OTH)

1.14 The email inviting participation in the SLAA Technical Consultation stated that the consultation was not an opportunity to make general comments on the suitability of a site or the SLAA Methodology, it was not a consultation with set questions. However, we received many informative comments regarding the SLAA Methodology and how the different ratings and assessment will be used.

1.15 Over a 100 responses were received. This included response from 28 out of 60 Parish/Town Councils (8 parishes had no sites submitted through the Call for Sites).

1.16 Comments were received on both factual information in relation to the sites and the SLAA Methodology on a variety of themes. The comments are not a comprehensive list of all the detailed points received, however the aim is to summarise how point have been considered as part of the development of the Final SLAA Methodology.

1.17 We have responded to these and provided a commentary as to how these have been taken into account in the SLAA and plan making process, this can be found in Appendix D

Please note any site-specific comments, where factual, will inform the assessment of the sites.

1.18 The Site Proformas dated 15.10.21 detailed 314 sites that came forward though the Call for Sites (2021) can be found [here](#). They were prepared as part of a desk top exercise utilising a wide range of spatial data, by AECOM³. The analysis utilises Geographic Information System (GIS) mapping which draws on data from multiple sources. The Site Proformas were intended to give a high-level review of each site according to various constraint and opportunity features, reflecting different themes including:

- Accessibility
- Communities
- Health and wellbeing
- Transport, air quality & noise
- Climate change and adaptation
- Land and water resources
- Landscape
- Historic environment
- Biodiversity and geodiversity

1.19 The journey time analysis in the Accessibility section, is a quantitative analysis which utilises Basemap's TRACC software, which calculates journey times including walking, cycling and public transport. It is intended to give a 'high level' indication of accessibility using sustainable travel and existing infrastructure. It indicates areas that are not currently

³ AECOM – the consultants commissioned to conduct the Sustainability Appraisal of Uttlesford's Local Plan

accessible, those that are highly accessible, and those areas in between. They do not necessarily reflect that there is a safe walking or cycling route at present and mitigation measures may be required in some locations. The TRACC Accessibility Analysis map and Technical Note can be seen [here](#).

1.20 The information on the Site Proformas is collated from a complex set of different data sources and assumptions for 'RAG' rules related to different features or criteria are outlined in the GIS Analysis Methodology (151021).

2. STRATEGIC LAND AVAILABILITY ASSESSMENT METHODOLOGY

Stage 1 – Site / broad location identification

Assessment area and site size

2.1 The area selected for assessment is the plan-making area – the district of Uttlesford.

2.2 The site size thresholds are as follows:

- 0.2 hectares (or 5 dwellings) for housing sites.
- 0.25 hectares (or 500m² floorspace) for employment sites.
- Other development – no threshold

2.3 Unless otherwise stated, references to ‘sites’ should be taken to include broad locations which may be identified.

Identifying sites

2.4 Sites will be identified from a wide range of sources, starting with the desktop review outlined in the below table.

Type of site	Potential data source
Existing housing and economic development allocations and site development briefs not yet with planning permission	Local and neighbourhood plans Planning applications records Development Briefs
Planning permissions for housing and economic development that are unimplemented or under construction	Planning application records Development starts and completions records
Planning applications that have been refused or withdrawn	Planning application records
Land in the local authority’s ownership	Local authority records
Surplus and likely to become surplus public sector land	National register of public sector land Engagement with strategic plans of other public sector bodies such as county councils, central government, National Health Service, police, fire services, utilities services, statutory undertakers
Sites with permission in principle, and identified brownfield land	Brownfield land registers (parts 1 and 2) National Land Use Database Valuation Office database Active engagement with sector
Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes, e.g. offices to residential)	Local authority empty property register English Housing Survey National Land Use Database Commercial property databases (e.g. estate agents and property agents) Valuation Office database Active engagement with sector

Uttlesford Strategic Land Availability Assessment (SLAA)

	Brownfield land registers
Additional opportunities for un-established uses (e.g. making productive use of under-utilised facilities such as garage blocks)	Ordnance Survey maps Aerial photography Planning applications Site surveys
Business requirements and aspirations	Enquiries received by local planning authority Active engagement with sector
Sites in rural locations	Local and neighbourhood plans
Large scale redevelopment and redesign of existing residential or economic areas	Planning applications Ordnance Survey maps
Sites in adjoining villages and rural exceptions sites	Aerial photography Site surveys
Potential urban extensions and new free-standing settlement	Sustainability Appraisal Scoping Report Landscape and heritage assessments

2.5 To ensure the process to identify land is transparent and identifies as many potential opportunities as possible, a call for sites was issued on 15 January 2021 with a submission deadline of 21 April 2021⁴. Details were published on the Council's website, circulated to those on the Local Plan contact database and publicised through adverts in the local press and social media posts.

2.6 A total of 298 site submissions were received through the call for sites. There are currently 420 sites within the SLAA. As the Local Plan progresses towards adoption, further sites may be submitted to the Council or circumstances may change on the sites included within the SLAA. The SLAA will be updated again during the plan making process to ensure site assessments remain up to date.

⁴ Late submissions may still be considered to inform the emerging Local Plan, if received before critical tasks have been completed.

Stage 2 – Site / broad location assessment

Housing Development potential

2.7 The draft SLAA Methodology had proposed a density of between 30-50 dwellings per hectare which differentiated by location. However, upon further investigation, it is considered that any density above 35dph in settlements outside Saffron Walden and Great Dunmow is not justified by evidence.

2.8 A search of the applications covering both planning permissions and completions which make up the five-year housing land supply has established that outside of the main settlements of Saffron Walden and Great Dunmow, or a new settlement, a density of above 35dph is not considered to be appropriate, as any higher density would not be considered to be in keeping with existing settlements across the district. To aid consistency in site assessments, a figure of 35dph and 45 dph is set out below:

Location	Density	Justification
Within Saffron Walden or Great Dunmow	45 dwellings per hectare (dph)	Allows a mix of housing types comprising houses, terraces and flats
Within any other settlement	35 dph	Respects the rural character of Uttlesford
Adjacent to any settlement	35 dph	Respects the rural character of Uttlesford
New settlement	45 dph	Based on the main large settlements in the district.

2.9 The estimation of development potential will be based on the net developable area of a site. Smaller sites will typically make use of existing roads and facilities, potentially enabling up to 100% of the site area to be developed. However, larger sites will require space for internal access roads, strategic open space and landscaping so the developable area will be reduced. Informed by assumptions used for the withdrawn Submission Local Plan, the ratios identified in the following table will be used to calculate the net developable area of each site.

Site size	Gross to net ratio
Up to 0.4 hectares	100%
0.4 – 2 hectares	90%
2 – 15 hectares	75%
15 hectares and above	60%

Employment development

2.10 Where the capacity of employment development sites is not provided, it will be estimated on the basis of the development density assumptions are as follows:

2.11 The sqm floorspace projections⁵ above have been converted to a land need based on the following plot ratios:

- 0.3 hectares for office and R&D uses;
- 0.4 hectares for industrial uses; and
- 0.5 hectares for warehouse / distribution floorspace.

⁵ Uttlesford Employment Needs & Economic Development Evidence (November 2021). 10.3 page 99

Assessing whether sites are likely to be developed

2.12 Plan-makers must assess the suitability, availability and achievability of sites, including whether the site is economically viable. A judgment can therefore be made as to whether a site is deliverable within the next five years, or developable over a longer period.

Suitability

2.13 A basic level of information will be recorded for all identified sites. Depending on the data source, some of this information may not be readily available so enquiries may need to be made. The information, as described in the PPG, is as follows:

- Site size, boundaries, and location
- Current land use and character
- Land uses and character of surrounding area
- Physical constraints (e.g. access, contamination, steep slopes, flood risk, natural features of significance, location of infrastructure/utilities)
- Potential environmental constraints
- Consistency with the development plan's policies⁶
- Proximity to services and other infrastructure, such as public transport
- Where relevant, development progress (e.g. ground works completed, number of units started, number of units completed)

2.14 Constraints mapping – data will be sourced from the Uttlesford GIS add reference here. Planning app

Availability

2.15 A site can be considered available for development when, on the best information available, there is evidence provided by the landowner that there are no legal or ownership impediments to development. Call for sites submissions will include information to assist this assessment, although enquiries may need to be made by officers where details are lacking and for sites identified from other sources.

2.16 The following criteria will be used to assess availability:

- Ownership/control
- Sole owner
- Multiple owners
- Availability confirmed by owner(s)
- Legal or ownership issues⁷

Achievability

2.17 A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.

2.18 The following criteria will be used to assess achievability:

Market factors

⁶ As the new Local Plan is at an early stage of preparation, it is likely that limited/no information on this topic will be available initially and a 'policy off' assessment will be undertaken within the SLAA.

⁷ For example, whether formal agreements are in place to ensure that land outside of the direct control of the owner(s) is made available to support delivery.

- What is the market strength of the locality?
- What is the attractiveness of the locality, potential market demand and projected rate of sales?

Cost factors

- Are there any constraints – for example, flooding, noise or physical features – which need to be overcome, and where the cost of mitigation measures may prejudice viability?
- Are there any site preparation costs – for example, associated with topography, contamination or existing uses/buildings – which may prejudice viability?
- Are there any specific infrastructure requirements – for example, transport or utilities infrastructure – which may prejudice viability?

Delivery factors

- Based on the Council’s evidence of housing delivery locally and the information submitted by site promoters, what are the realistic build-out rates on larger sites (including likely earliest and latest start and completion dates)?

Amount of development which could be delivered, by time period:

- Pre Year 1: Pre Apr 2024
- Year 1-5: April 2024–Mar 2029
- Years 6-10: Apr 2029-Mar 2034
- Years 11-15: Apr 2034-Mar 2039
- Post Year 15: Post Mar 2039
- Is a single developer, or are several developers, offering different housing products?
- What is the size and capacity of the developer?

Suitability, Availability, Achievability

Suitability	
Question Title	Explanation
Physical Constraints	An assessment of any other physical constraints that would need to be overcome through the planning application process e.g. access to the site, infrastructure, neighbouring uses, proximity of waste water treatment works, topography, mineral designations, etc. ground conditions, hazardous risks, pollution or contamination
Overcoming suitability constraints	A range of potential solutions for any constraints
Availability	
Submitted by?	Whether the site has been submitted by a landowner or an agent, and whether there is a developer involved. This question will not feature any names, addresses or personal details of any kind.
Availability Considerations	Whether the site has a history of unimplemented planning permissions. The number of landowners there are on the site. Impact of the existing land use of the site on availability. Impact of any land ownership constraints or any third party land required.

Overcoming availability constraints	A range of potential solutions for any constraints
Achievability	
Is the site economically viable?	Developer interest in the site can demonstrate that it is economically viable, along with a recent history of planning applications showing developer intent.
Overall Deliverability	<p>Depending on the evidence submitted in the suitability, availability and achievability sections, a site will be given a deliverability timescale, these being:</p> <p>0-5 years- no constraints to deliverability, or constraints can be mitigated. Units will be projected from the start of the supply period.</p> <p>6-10 years – constraints have been found that will take time to be mitigated, or the site is part of long-term phase. Units will be projected from year 6 of the plan period.</p> <p>11-15 years – significant constraints have been found that will take significant time to be mitigated, or the site is part of long-term phase. Units will be projected from year 11 of the plan period.</p> <p>Not deliverable – the constraints on the site cannot be mitigated against, and the site is held in abeyance, no units from this site will be projected in the supply.</p>

Site classification

Once a site has been assessed against the suitability, availability and achievability criteria, it will be given a classification from A to C in accordance with the below table.

Classification	Description
A: Considered deliverable within 0-5 years	<p>These are sites are considered deliverable within the first five years of the plan period. They either</p> <ul style="list-style-type: none"> • Have planning permission; or • Do not currently have planning permission but are largely free from major physical and infrastructure constraints. The sites are broadly in line with national planning policy considerations
B: Have potential to demonstrate suitability, availability, and achievability within 5-15	<p>These are sites where there is either a change in policy or evidence is needed to demonstrate the achievability or suitability within the plan period. This could include, for example, mitigating impacts of noise or air pollution, mitigating against flooding, or minimising the impact on neighbouring uses or the landscape, historic or natural assets.</p>
C: Not considered developable 15+	<p>These sites are not considered developable for one or more of the following reasons:</p> <ul style="list-style-type: none"> • Development is unlikely or will not take place within the plan period • Unable or unlikely to address physical constraints • Unable or unlikely to address achievability issues • Incompatible with National Policy

Engagement with site owners and promoters

2.19 It is likely that Council officers will need to liaise with some site owners and promoters to further their understanding of development potential. Any such engagement will take place in accordance with the approved *Local Plan Community Engagement Strategy 2021*⁸.

Site visits

2.20 It will not always be necessary to carry out a site visit in order to complete an assessment. However, depending on the nature of the site and any uncertainties regarding particular assessment criteria site visits will be undertaken by officers.

Updating the site assessments

2.21 As parallel work on the new Local Plan progresses, it will be necessary to update the SLAA. Further sites may come forward and there may be changes to the suitability criteria described above.

Stage 3 – Windfall assessment

2.22 The most recent evidence on windfall allowance was approved by the Council's Local Plan Leadership Group on 24 June 2021 and is contained within the supporting report entitled *Windfall Allowance for Uttlesford (June 2021)*. The report considers the delivery of windfall sites over the 10-year period from 2010/11 to 2019/20, concluding that there is evidence to justify a windfall allowance of **114 dwellings per year**.

2.23 If the Council identifies broad locations for development in years 6-15, this windfall allowance may be used.

2.24 Upcoming work will examine the windfall allowance so it is possible the figure will change. If this is the case, the SLAA methodology will be updated accordingly.

Stage 4 – Assessment review

2.25 Once the sites have been assessed, the development potential of all sites can be collected to produce an indicative trajectory. This should set out the amount of housing and economic development that can be provided, and at what point in the future (i.e. within years 1 to 5, 6 to 10, and 11 onwards).

2.26 If there are insufficient sites to meet objectively assessed needs (including the identified local need), the Council will need to reconsider its assessment of sites. This could include, for example, issuing a further call for sites, or changing the assumptions about development potential to ensure the most efficient use of land.

2.27 While the scenario is considered highly unlikely for the district of Uttlesford, if insufficient land remains it will be necessary to investigate how this shortfall can be planned for. If there is clear evidence that the needs cannot be met locally, it will be necessary to consider how needs might be met in adjoining areas through the process of preparing statement of common ground, and in accordance with the duty to cooperate.

⁸ In particular, paragraphs 5.20-5.22 and Appendix F

Stage 5 – Final evidence base

2.28 The following outputs will be produced following the assessment:

- A list of all sites or broad locations considered, cross-referenced to their locations on maps
- An assessment of each site or broad location, including:
 - Where these have been discounted, evidence justifying the reasons given
 - Where these are considered suitable, available and achievable, the potential type and quantity of development, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when
 - An indicative trajectory of anticipated development based on the evidence available

2.29 The assessment will be made publicly available on the Council's website, accessible from the landing page at www.uttlesford.gov.uk/new-local-plan. The publication format will be designed for accessibility, and will include an interactive map.

2.30 The assessment will be used to inform plan-making, and to demonstrate whether there is a five-year housing land supply (for example, utilising sites in classifications A and B) for both plan-making and decision-taking.

Appendix A – Strategic Site Availability Assessment (SLAA) Form

The Suitability criterion have been added to the below Site Assessment Template Form setting out how the suitability criterion have been assessed.

Site assessment form		
Ref:		
Site address:		
Site classification:		
[Map]		
Existing use:		
Proposed use:		
Site area (ha):		
Developable area (ha):		
Capacity:	[Homes] [Economic development floorspace] [Other]	
Surrounding uses:	North:	East:
	South:	West:
Source:		
List of submitted studies/reports:		
Suitability – Initial assessment		
For housing and economic developments, would the minimum threshold of development require the use of land in Flood Zone 2 or 3?		
Would the proposed development clearly have an adverse effect on a Site of Special Scientific Interest (SSSI)?		
Would the proposed development clearly result in the loss or deterioration of ancient woodland?		
Would the proposed development clearly		

result in substantial harm to, or loss of, a scheduled monument ?	
Would the proposed development clearly result in substantial harm to, or loss of, a Grade I or Grade II* listed building ?	
Would the proposed development clearly result in substantial harm to, or loss of, a Grade I or Grade II* registered park or garden ?	
Conclusion:	[Classification: E] / [Progress to detailed assessment]
Suitability – Detailed assessment	
National policy constraints	
Does the site meet the definition of previously developed land?	
Is the site within or adjoining an existing settlement?	
Local policy constraints	
⁹ Proximity to Green Belt	
Proximity to the Countryside Protection Zone	
Proximity to a Public Safety Zone	
Proximity to Important Woodland	
Proximity to a Special Verge	
Proximity to a Historic Landscape	
Proximity to a Local Historic Park/Garden	
Proximity to a Protected Lane	

⁹ Proximity is defined as whether the site is wholly within, partially within, adjacent to but outside or outside a particular constraint.

Proximity to a Protected Open Space	
Proximity to a Poor Air Quality Zone	
Is the site designated/allocated within a made Neighbourhood Plan?	
Flooding	
Which fluvial flood zone applies to the site?	
Which surface water flood zone applies to the site?	
Which groundwater flood zone applies to the site?	
Pollution	
Which aircraft noise contour applies to the site?	
Are there any potential noise issues?	
Proximity to an Air Quality Management Area (AQMA)	
Would development on the site increase movements through an AQMA?	
Which groundwater source protection zone applies to the site?	
If the site is ≥ 5 ha, is it within a Minerals Safeguarding Area for sand and gravel?	
If the site is ≥ 3 ha, is it within a Minerals Safeguarding Area for chalk?	
Is the site within a Minerals Safeguarding Area for brick earth or brick clay?	
Is the site within a Waste Consultation Area?	

Natural environment	
Proximity to Site of Special Scientific Interest Impact Risk Zones (SSSI IRZs)	
Proximity to European sites (Special Area of Conservation, Special Protection Area and/or Ramsar site)	
Proximity to National Nature Reserves (NNRs)	
Proximity to Local Wildlife Sites (LWSs)	
Proximity to BAP priority habitat	
Proximity to ancient woodland	
Proximity to Local Geological Sites	
Proximity to National Trails and public rights of way	
Landscape sensitivity	
Is the site within an area noted in a Historic Settlement Character Assessment?	
Are there any Tree Preservation Orders (TPOs) on the site?	
Which Agricultural Land Classification applies to the site?	
Historic environment	
Proximity to scheduled monuments	
Proximity to archaeological sites	
Proximity to listed buildings	
Proximity to locally listed heritage assets	
Proximity to conservation areas	
Proximity to registered parks and gardens	

Accessibility	
Primary school walking catchment	
Secondary school accessibility catchments for:	
Walking	
Cycling	
Public transport	
Sixth form accessibility catchments:	
Walking	
Cycling	
Public transport	
College accessibility catchments:	
Walking	
Cycling	
Public transport	
GP and health centre accessibility catchments:	
Walking	
Public transport	
Hospital accessibility catchments:	
Walking	
Public transport	
Fruit and vegetable retailer accessibility catchments:	
Walking	
Public transport	
Local centres accessibility catchments:	

Walking	
Cycling	
Public transport	
Employment centres accessibility catchments:	
Walking	
Cycling	
Public transport	
Bus and rail network walking catchments:	
1 service per hour	
4 services per hour	
Rail station accessibility catchments:	
Walking	
Cycling	
Public transport	
Is there a viable route from the site to the principal or strategic road network (B roads, A roads and motorways)?	
Are there any fundamental constraints affecting safe site access for road/path users?	
Other land uses	
Would there be a net loss of open space, sports or recreational facilities?	
Would there be a net loss of employment land?	

Would there be a net loss of retail provision?	
Would there be a net loss of community facilities?	
If new homes are to be completed before 2030, do forecasts suggest a surplus or deficit of school places?	
If known, would any additional uses or infrastructure (including green infrastructure) be provided on site?	
Conclusion:	
Availability	
Is the site under single or multiple ownership?	
Has availability been confirmed by the owner(s)?	
Are there any known legal, ownership or control issues?	
Number of homes or amount of floor space (in m²) which could be delivered in each time period	
Pre Year 1: Pre Apr 2024	
Y1: Apr 24-Mar 25	
Y2: Apr 25-Mar 26	
Y3: Apr 26-Mar 27	
Y4: Apr 27-Mar 28	
Y5: Apr 28-Mar 29	
Y6-10: Apr 29-Mar 34	
Y11-15: Apr 34-Mar 39	
Post Y15: Post Mar 39	

What is the expected duration of development (including commencement and completion dates)?	
What would be the completion rate, in terms of the number of homes or amount of floor space (m²) completed per year?	
Conclusion:	
Achievability	
Market factors	
What is the market strength of the locality?	
What is the attractiveness of the locality, potential market demand and projected rate of sales?	
Cost factors	
Are there any constraints – for example, flooding, noise or physical features – which need to be overcome, and where the cost of mitigation measures may prejudice viability?	
Are there any site preparation costs – for example, associated with topography, contamination or existing uses/buildings – which may prejudice viability?	
Are there any specific infrastructure requirements – for example, transport or utilities infrastructure – which may prejudice viability?	

Delivery factors	
Including the developer's own phasing, what are the realistic build-out rates on larger sites (including likely earliest and latest start and completion dates)?	
Is a single developer, or are several developers, offering different housing products?	
What is the size and capacity of the developer?	
Conclusion:	
Site classification	
What is the site classification? Include conclusions and record classification at top of form	
If the assessment reveals that a different type or scale of development for the site has potential, specify corresponding site reference number	
If the assessment reveals further sites with potential for development which had not previously been identified, specify corresponding site reference number	

Summary of deliverable/developable capacity								
Reference	Suitable?	Available?	Achievable?	Deliverable capacity Pre Year 1	Deliverable capacity Years 1-5	Developable capacity Years 5-10	Developable capacity Years 10-15	Capacity not currently developable

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Appendix C: SLAA Technical Consultation - copy of email consultation invitation sent to Parish and Town Councils and Landowners/Site promoters on 18 October 2021

Dear Sir/Madam

This email is being sent to all Town/Parish Councils, inviting comments on our initial assessment of sites that are potentially available for development. It is also being sent to those who submitted sites to us following the 'call for sites' in Spring 2021, and to Councillors (primarily for information purposes).

It is important to bear in mind that only some of these sites will be chosen for inclusion in the Local Plan and the Council is expecting to make that decision next Spring based on planning evidence. The first part of that evidence is a technical assessment for each site and your comments on that assessment are now requested.

All site assessments are ordered by parish within a single PDF document, which can be downloaded [here](#). The assessments do not cover 'committed sites' – housing and employment sites already with planning permission. These will be factored into our calculations on additional requirements, and in our proposals for where additional homes and jobs should be located.

The assessments have been completed as a desktop exercise, utilising a wide range of spatial data, by AECOM – the Council's consultants carrying out the sustainability appraisal of the Local Plan. They will feed into a broader piece of site assessment work known as the Strategic Land Availability Assessment (SLAA). An initial SLAA methodology was published in April – [here](#) – and the process will be fully documented in reports that we will publish alongside our consultation on the Draft Local Plan (Regulation 18) in Spring 2022.

The purpose of this technical consultation is as follows:

- a) To review the plotted site boundaries
- b) To fact-check the results from our desktop analysis

The technical consultation is not an opportunity to make general comments on the suitability of a site. Please reserve any such comments for the assessment of the sites to be published alongside the Local Plan in the Spring.

Please send any comments to localplan@uttlesford.gov.uk, ensuring that the Subject field includes the words "SLAA Technical Consultation". Comments must be received by **29 November 2021**.

This stage of consultation with Town and Parish Councils is one of several opportunities over the coming months that local councils will have to comment on the emerging Local Plan, and we look forward to your response to help the District Council make the best decisions for the future planning of Uttlesford.

Please note:

- Sites have been referenced according to the format, [Parish] [Unique three-digit number] [Predominant use]. The 'predominant use' (RES - Residential; EMP - Employment; COM - Community; MIX - Mixed use; OTH – Other; ??? – To be confirmed) should be treated as indicative at this stage.
- The attached document describes the GIS analysis methodology, including how Red/Amber/Green thresholds have been applied.
- Wimbish 003 MIX: We are aware of an error regarding this site boundary. This will be resolved before the assessment is finalised.

Local Plan and New Communities Team

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Appendix D: SLAA Technical Consultation – Summary of Comments and Review

Key general issues identified in the responses received were as follows:

1. Clarity was sought within the responses on the purpose of the consultation, the stage of plan making and what and when comments on sites were required. This is a key takeaway from the consultation. The questions and plan making stages will be more defined in future.
2. The level of detail which has been provided has been informative and has informed the SLAA Methodology. Factual site information will inform the assessment of sites over the coming months.
3. A key response to the SLAA was in reference to whether or not a site should be allocated. The intention of the SLAA is to assess available sites within the district and assess if they are deliverable. It is not the purpose of the SLAA to ascertain if they are suitable for potential allocation. It is however accepted that clarity should have been set out as part of the consultation on the SLAA process.
4. Further details on the Red/Amber/Green (RAG) ratings and values of the cumulative assessment of RAG ratings in decision making on sites were sought. Red RAG ratings of constraints such as Greenbelt, Countryside Protection Zone, Development Limits do not mean sites are not deliverable within the context of the SLAA. This is accepted and the individual RAG ratings have been removed from the SLAA Methodology.
5. Clarity was sought on the distances of the proximity to infrastructure, the data source and how this will be used to assess sites. The distances to infrastructure are used as a guide to relative sustainability of the site; they are not exact measurements or result in values or scoring of sites.

	Key questions/issues	Comments
1	All sites are likely to have at least one red score. At present there is no methodology as to how different scores will be assessed – for example a site in a conservation area and has a red score. This does not mean it is inappropriate for development.	Noted. The final SLAA Methodology has been revised to remove the scoring of individual site characteristics by RAG ratings (Red/Amber/Green).
2	The GIS Analysis Methodology document states that the site assessment criteria are set out into themes which are supposed to align with the SA themes. How some of the criteria used for the site assessments address the key sustainability issues identified for the District within the SA Scoping Report produced by AECOM, is questioned. The issues for the authority are more nuanced than the binary assessment criteria allows for and does not allow sites to be fairly weighted as part of the assessment. We consider that the arbitrary criteria applied are too coarse and need to be refined and more sophisticated in scope to meet the key objectives set out in the SA Framework. Examples are expanded on re: Heritage environment, TPOs, CPZ, Accessibility, Hatfield Forest, the difference between housing and employment sites.	Noted. The final SLAA Methodology has been revised to remove the scoring of individual site characteristics by RAG ratings (Red/Amber/Green).
3	Question the methodology in relation to RAG ratings for TPOs Historic Environment, SSSI impact risk zone in determining the spatial strategy	Noted. The final SLAA Methodology has been revised to remove the scoring of individual site

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		characteristics by RAG ratings (Red/Amber/Green).
4	It is critical in terms of the decision-taking process that UDC: - discloses to Parish Councils, before proposing any site for inclusion in its revised draft Local Plan, the reasons for such selection; and - ahead of initiating the formal Regulation 18 consultation procedure, provides Parish Councils concerned with an opportunity to make formal representations relating to matters of fact regarding any such site proposed	All available sites will be assessed consistently, taking into account where comments have been received and the clear justification for site selection will be published. as part of the Local Plan evidence base. In addition, a further assessment of sites and the reasoning/justification for the proposed allocations will be set out within a separate Site Selection Methodology. The publication of the draft Local Plan will provide the opportunity for comments,
5	Without an understanding of the access to the site and potential layout it is more difficult for the parish council to verify the technical data as walking distances	Noted. Through consultation with ECC Highway's we will assess access for all sites.
6	It is unclear whether there has been consultation on the SLAA methodology	The SLAA methodology was noted by Local plan Leadership Group, 29 April 2021. Although the SLAA Technical Consultation (18 October – 29 November 2021) was a fact checking exercise, comments were received as part of the consultation, which have informed the final SLAA methodology.
7	SLAA Technical consultation does not take into consideration new facilities and infrastructure which will be delivered through development	The SLAA is a 'policy off' assessment as to whether a site has the potential for development. Through the site allocation's process policy considerations and new facilities and infrastructure will be considered in assessing if sites are appropriate for allocation.
8	Concern that suitability and deliverability should rely on a desk top exercise	Noted. Assessment of suitability and achievability combines both desk top analysis, officer judgement and site knowledge and visits where required. The final SLAA Methodology has been revised accordingly.
9	How have the stated times and distances been determined?	Journey times are based on catchment time zones indicated on TRACC Accessibility Analysis outputs. Assumptions, limitations, data sets and methodology for identifying

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		catchments are outlined in the <i>Uttlesford TRACC Datasets and Parameters Technical Note (20210818)</i> available here (click on the Technical Note link via the webpage)
10	The same accessibility assessment of employment sites is not relevant. Should be treated different to residential	Noted, Further explanation on the assessment of Employment sites has been added to the Final SLAA Methodology.
11	Walking and cycling routes do not take into account suitability or safety	Noted, the routes are used as a guide to distances and journey times and do not take into consideration highways safety.
12	There are multiple inaccuracies in the measurements and omissions in the information presented in the Site Proformas	The TRACC Accessibility Analysis has been undertaken to provide an indication of the potential accessibility of areas within the district to a range of facility types. This provides a <u>high-level</u> indication of accessibility. It is not intended to provide accurate to the minute journey times. It is used to provide an indication of indicative access to infrastructure and services. The accessibility catchments are not a definitive indicator that an undeveloped area is accessible. Development may require and provide new infrastructure or services.
13	There is a reference to data limitations in the GIS analysis but the generalisations that have been applied throughout the desk-top initial assessment of sites have caused data flaws and inaccuracies. This lack of precision and clarity brings into question the validity of the entire document. Some attributes are not included or are different from the UDC Constraints Map. The document <i>GIS Analysis Methodology</i> shows data is said to be derived from disparate sources, including the Department for Levelling Up, the Environment Agency, Historic England and Natural England, with no further reference. It is impractical for members of the Parish Council to search out these sources.	Noted. The Uttlesford District Council constraints map will be the data source for assessing site constraints.
14	Treatment of the Green Belt - the SLAA methodology is correct and supported. The RAG rating should not be applied because it is a policy consideration. The Green Belt status should therefore not form part of the analysis at this stage	The SLAA is a 'policy off' assessment as to whether a site has the potential for development. Through the site allocation's process policy considerations will be considered in assessing if sites are appropriate for allocation. The final SLAA Methodology has been

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		revised to remove the scoring by RAG ratings (Red/Amber/Green).
15	Treatment of settlement development limits is identified as a red constraint. Settlement Development Limits are inappropriate criterion as limits are out of date.	The final SLAA Methodology has been revised to remove the scoring of individual site characteristics by RAG ratings (Red/Amber/Green).
16	Treatment of agricultural land classification. The classification of agricultural land is questioned as the majority of land within Uttlesford lies within grades 1-3 and thus will be flagged red, it is questioned if this is a reasonable approach	The final SLAA Methodology has been revised to remove the scoring of individual site characteristics by RAG ratings (Red/Amber/Green).
17	The whole of the district comprises either Grade 2 agricultural land, Grade 3 agricultural land, urban land or other land in non-agricultural use. Therefore, the site assessment would be more meaningful and useful if the methodology was amended to score sites 'red' where they predominantly comprise Grade 2 land, 'amber' for Grade 3 land and 'green' for urban or non-agricultural land.	
18	Although it is noted that the Groundwater Source Protection Zone criteria is based on a site's position within or outside a Special Protection Zone (SPZ), as defined by the Environment Agency. However, in reality a development's potential impact on groundwater sources will vary depending on a number of site-specific considerations, including geology, topography / levels and the likelihood of pollution from different types of development and uses.	Noted. Constraints published by the Environment Agency will be checked as part of the reassessment of sites. This will be noted within the site assessments as a constraint, how constraints and development potential will be assessed in detail further along in the Local Plan process.
19	Treatment of historic landscapes: 'Proximity to a Historic Landscape' appears to be based on a site's proximity to an existing settlement – with those nearer a settlement scoring worse. However, these two things are not linked, as existing settlements are not necessarily historic landscapes.	Noted. <i>Proximity to Historic Landscapes</i> will be removed from the SLAA. There is reference to heritage assets, conservation areas, and the landscape and heritage sensitivity evidence in the SLAA
20	How will the RAG rating for Ground Source Protection Zones be applied	The final SLAA Methodology has been revised to remove the scoring of individual site characteristics by RAG ratings (Red/Amber/Green).
21	The published SLAA methodology (or any other part of the LPAs evidence base) does not identify the location of or area covered by 'Poor Quality Air Zones', nor does it define these areas or explain the significance or impact of this constraint. In addition to the inaccuracies in the assessment that has been undertaken with regards Air Quality, we are also concerned at the lack of evidence and information behind the Poor-Quality Air Zones themselves. There appears to be no framework or methodology in place for the identification of such zones and the process the LPA has been through to get to this point.	The Poor Air Quality Zones are identified on the Constraints Map (layer titled: Local Plan – poor air quality zones). The SLAA is a 'policy off' assessment as to whether a site has the potential for development. Through the site allocation's process policy considerations will be considered in assessing if sites are appropriate for allocation. The final SLAA

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		Methodology has been revised to remove the scoring of individual site characteristics by RAG ratings (Red/Amber/Green) assessment.
22	Inaccuracies in Local Heritage List	Noted. It is acknowledged that the Local Heritage List references were incorrect in the Site Proformas 151021 and this will be addressed. The revision will reference the Uttlesford Local Heritage Lists dated 2018 and 2021.
23	There is no reference to Foul water disposal	Noted. Waste Water Treatment Works Access has now been added to the Site Assessment process.
24	Access to the Technical Note within GIS Methodology – link did not work	Noted. The Technical Note can be accessed via this link on the Uttlesford Accessibility Analysis resource
25	The document GIS analysis methodology shows that elsewhere in the tables, data is said to be derived from disparate sources, including the Department for Levelling Up, the Environment Agency, Historic England and Natural England, with no further reference. It is impractical for members of the Parish Council to search out these sources. Furthermore, in some instances (e.g. Listed Buildings) the site of the feature in question is not given. The present Local Plan expired in 2011. In the previous versions of the Plan which failed in 2014 and 2020, the dwellings which had been approved since 2011 were taken into account. The PC takes the view that any increase in numbers must be noted in the current exercise. Inclusion of the following data items is recommended for each parish: No of dwellings, 2011; No of dwellings approved, 2011-2021; Increase in number of dwellings: Percentage increase. The number of dwellings in 2011 is readily available from the census for that year.	Noted. We appreciate that it is a complex task checking the facts displayed on the Site Proformas 151021 and the sources of information or data. The purpose of the SLAA is to identify a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period. The assessment does not in itself determine whether a site should be allocated for development. Analysis of historic housing delivery and permissions will be evaluated as part of the spatial strategy and housing trajectory work for the new Local Plan.
26	Reference to Neighbourhood Plans have been omitted.	The made Neighbourhood Plans form part of Uttlesford's Development Plan, however this is a 'policy off' assessment and local policies and aspirations are not in part of the SLAA assessment process. Neighbourhood Plan policies are addressed at a later stage of the plan making process. Allocations within Neighbourhood Plans are

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		included within the SLAA and included within the housing trajectory work.
27	Previous planning applications have been submitted and refused on proposed sites and/or lost at appeal. They should be considered.	Noted, site planning history will be fully assessed up to March 2022. Moving forward, the planning history of sites will be updated prior to examination. The planning history of a site will also inform the assessment of achievability, a past permission or refusal does not determine whether a site is deliverable and may be required if circumstances, national policy or need change.
28	How have journey times been calculated? Journey times are different to those recorded in the proforma, and fall within a different RAG rating	Journey times are based on catchment time zones indicated on TRACC Accessibility Analysis outputs. Assumptions, limitations, data sets and methodology for identifying catchments are outlined in the <i>Uttlesford TRACC Datasets and Parameters Technical Note</i> (20210818). The Uttlesford TRACC analysis has been undertaken to provide an indication of the potential accessibility of areas within the district to a range of facility types. This provides a high-level indication accessibility. It is intended to be used as a guide. However, highly inaccurate ratings will be noted in the detailed SLAA assessment.
29	Schools: Is this based on state primary and secondary schools? Are private/fee paying schools included?	The destination data source for schools is www.get-information-schools.service.gov.uk (formerly Edubase) as stated in the TRACC Technical Note in Appendix 2. It is based on state primary and secondary schools only. Private/fee paying schools are excluded.
30	Primary school (walking): The distance to the primary school is not appropriate or feasible for young children	We acknowledge that some distances may not be appropriate for very young children and that walking times may be slower. The

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		journey times will be used as a guide to inform detailed assessment of sites.
31	Secondary school journey times: in some areas there are several secondary schools / sixth forms which are used by different residents, with different journey times, not all reflected in the RAG rating	The destination data source for schools is www.get-information-schools.service.gov.uk (formerly Edubase) as stated in the TRACC Technical Note in Appendix 2. The journey is based on the nearest secondary school, taking into account and using public transport in term time.
32	Bus service: there are inaccuracies in some bus service journey times. In some instances this is due to temporary time table changes due to the Covid 19 pandemic; significant wait times for required for bus changes/connections.	The bus network journey times are based on public transport provision dataset provided by a National Public Transport Data Repository (NPTDR). Bus timetables from January 2020 were used in the analysis to reflect the pre-Covid bus network operation. The analysis took place during the pandemic whilst reduced services were in operation, therefore it was requested by UDC to use the last available data prior to service reductions to reflect what accessibility was like prior to lockdown. The analysis uses the timetables from a Wednesday. The time periods used are detailed in the TRACC Technical Note in Appendix 2. This will be reviewed as the Local Plan evidence is updated as bus data is likely to change.
33	GP & health centre: GP services are over subscribed and not accepting new patients	This analysis looks at accessibility to the closest GP. Potential allocations in the Local Plan will take into account the need for and the provision of additional healthcare infrastructure.
34	Hospital (public transport): Full health services are not available at Saffron Walden community Hospital and Herts & Essex in Bishop's Stortford. Journey times to general hospitals with accident & emergency (Addenbrookes and Princes Alexandra Hospital in Harlow) are considerably longer.	With regard to access to hospitals, we appreciate that there are different levels of service provision available at hospitals which serve Uttlesford. Journey times are based on the nearest hospital and intended as a guide to

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		inform detailed site assessment.
35	Retailers selling fruit and vegetables - assessment only looks at walking travel time to these shops	The Uttlesford TRACC analysis has been undertaken to provide an indication of the potential accessibility of areas within the district to a range of facility types. This provides a high-level indication accessibility. It is intended to be used as a guide. However, highly inaccurate ratings will be noted in the detailed SLAA assessment.
36	Reference to local convenience stores versus a full supermarket - review if these are acceptable to count towards distance to retailers and food supplies	Distinction between local convenience store vs full supermarkets is not a requirement for this fact checking exercise. Access to retailers that sell fresh fruit & veg is measured, because it contributes to health & wellbeing.
37	<p>Local centres:</p> <p>The definition of 'Local Centre' is a location with a post office and a retailer selling fruit & veg. There is no post office at Hatfield Heath and it should not be classified as a Local Centre.</p> <p>There is no local centre (shops or post office) in Quendon and Rickling. Times are incorrect. Nearest centre is Newport.</p> <p>The nearest local centre to Hatfield Broad Oak (where there is no post office) is Takeley/Priors Green.</p> <p>The local centre for Birchanger sites is Waitrose at the motorway service station. This is not designed for general public access</p>	Noted, thank you for providing updates to the provision in local centres, the local facilities are used to provide a broad indication of relative sustainability of a settlement. These will be reviewed and updated as part of the plan making process and in deciding whether settlements are appropriate for allocation or not.
38	Clarification is sought as to what constitutes an employment centre.	The 'Employment Centres' identified in the TRACC Accessibility analysis are based on locations comprised of town centres, industrial estates and business parks. The locations were cross-referenced with the 2011 Census workplace population data to ensure high job density locations were captured.
39	School services – reference to school services is confusing as would school services not be considered in school (public transport) ratings. Should Bus network be related to non-school services?	The bus services that are included in this assessment are based on registered bus services. There are several services that are specific school services that operate

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		during school term time only. For the purposes of this assessment, except for public transport catchments generated for secondary schools, these services have now been removed to ensure that public transport catchments are only generated based on services that also operate throughout school holidays. Services that operate a school term variation to serve the school but continue to operate throughout the holiday without visiting the school stop have been retained in the dataset.
40	Bus network 1 service per hour: The no. 5 bus route was revised on 3.11.2021. This bus service no longer meets the criteria of 1 service per hour (now <1 per hour).	Bus service and journey times are based on pre-pandemic timetables in January 2020. We appreciate that there have been some temporary changes have been made. The times are intended to give a high-level indication of existing services.
41	There is no daily bus service transport in Clavering and Arkesden. There is Demand Responsive Transport Service but not available on a daily basis.	Noted. The bus network journey times are based on public transport provision dataset provided by a National Public Transport Data Repository (NPTDR). Bus services will be reviewed as the Local Plan evidence is updated as it is acknowledged bus data is likely to change.
42	<p>Qualify what adjacent to a settlement development limit means. A site could be near to but not abutting the boundary. Adjacent housing sites built or approved, not yet built, could abut the development limit suggesting a new site, nearby could be an amber rating.</p> <p>Adopted boundaries don't reflect true extent of a settlement.</p> <p>Proposed sites abut development that has been permitted adjacent to, but outside Settlement Development Limits.</p>	<p>The final SLAA Methodology has been revised to remove the scoring of individual site characteristics by RAG ratings (Red/Amber/Green).</p> <p>We acknowledge that some development has been permitted outside development limits and may have been either built or in the process of being built. Settlement development limits will be reviewed in the new Draft Local Plan and there will be an opportunity to comment as part of the regulation 18 Consultation.</p>
43	The objective is to support healthy lifestyles for all community groups by reducing health inequalities and delivering positive	The SLAA also considers health & wellbeing in the

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	health outcomes, including through increased access to healthcare, recreational facilities, open space and green infrastructure. Yet the site assessment is limited to criteria related to the level of deprivation of the area and whether it falls within the Stansted Airport Safety Zone. Again, this does not capture information to identify if the objective has been met or to answer potential assessment questions set out in the draft SA Framework	context of accessibility and active travel –for walking and cycling to schools, employment, services and facilities and access to public transport. The Sustainability Appraisal is a separate assessment which assesses the requirements and duties for Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA).
44	It is not clear what poor air quality zone relates too, e.g. road, airport etc.	There are two poor air quality zones in the district: A zone 100 metres on either side of the central reservation of the M11 and a zone 35 metres either side of the centre of the A120 These are referenced in policy ENV13 of the 2005 Local Plan and are indicated on the Council's Constraints Map . The Air Quality Management Area is also marked on the Constraints Map, located at Saffron Walden.
45	Noise Contours: The GIS methodology does not recognise the 54db noise contour, however it is recognised that 'significant community annoyance' starts at 54db	Noted. Noise will be assessed as part of the Site Selection Methodology and in consultation with UDC Environmental Health Officers.
46	Within the climate change theme, the objective is to reduce the contribution to climate change made by activities in the District. Considerations to achieve this include, proposals to improve or extend local footpaths or cycle paths, promotion of sustainable modes of transport, ability to generate energy from low or zero carbon sources. Yet the site assessment criteria under climate change adaptation is limited to whether the site is at fluvial flood risk. This captures none of the objectives set out in the SA. [row 518]	The SLAA considers this objective in a wider context by looking at walking and cycling accessibility to various services and facilities. It uses this as an objective proxy criterion. Climate change mitigation/adaptation and proposals to move to a net zero position are the core objectives of the Local Plan and will need to be demonstrated in spatial strategy for growth and potential site allocations later within the plan making stages.
47	Climate Change and Adaptation only refers to Fluvial Flood risk. This is not an accurate indication of flooding in specific areas, which have been well documented	Noted. More detailed information will be obtained on localised flood events in the Strategic Flood Risk

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		Assessment as part of the wider evidence based supporting the Local Plan.
48	We recommend that the scoring should differentiate between Grades 1-2 and 3 in order to identify those sites that are less valued agricultural land, in the context of Uttlesford District	The classification reflects the appropriate importance of agricultural land. It is recognised that much of Uttlesford is high grade agricultural land and at the next stage, RAG ratings have been removed for the SLAA Methodology.
49	Minerals and Waste Consultation Area - Should not constitute a red rating.	Noted. RAG ratings of individual site characteristics have been removed for the SLAA Methodology.
50	Countryside Protection Zone: This is a policy designation in the adopted Local Plan and its compliance with the NPPF has not been tested at public examination. Inclusion of this planning designation with the description of the baseline environment is not appropriate and should be omitted from the site assessments.	Noted. The SLAA is a 'policy off' assessment as to whether a site has the potential for development. Through the site allocation's process policy considerations will be considered in assessing if sites are appropriate for allocation. The final SLAA Methodology has been revised to remove the scoring of individual site characteristics by RAG ratings (Red/Amber/Green).
51	The name of some conservation areas (shown in brackets) are incorrect.	The Conservation appraisals are shown on the Council's website. Some conservation areas are split into more than one area. The labels on the Constraints Map are incorrect and will be updated.
52	All designations within the heritage environment are treated equally, whether a listed building is Grade II or Grade I and that all parts of a Conservation Area have the same significance as each other, which is rarely the case. The 50 m distance used for the amber and green indicators appears arbitrary. Question whether the same distance should be applied to all heritage assets.	National Planning Guidance sets out the method for assessing land suitability. A site or broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated. The SLAA identifies constraints to be considered, including potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation. The final SLAA Methodology has been revised to remove the scoring of individual site characteristics by RAG ratings (Red/Amber/Green).

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53	Some inconsistency in distance of sites from Important Woodland and Local Wildlife Sites, or between Important	The boundary of Important Woodland may be different from that of Ancient Woodland, or a Local Wildlife Site. For example a Local Wildlife Site may only have one part woodland. The final SLAA Methodology has been revised to remove the scoring of individual site characteristics by RAG ratings (Red/Amber/Green).
54	Request for clarity on what Priority Habitat is referred to on the Site Proforma	The final SLAA Methodology has been revised to remove the scoring of individual site characteristics by RAG ratings (Red/Amber/Green).
55	A site may intersect for example an ancient woodland or Priority Habitat so is given a red rating. But the proposed development would protect the area concerned	As point 52 above. The final SLAA Methodology has been revised to remove the scoring of individual site characteristics by RAG ratings (Red/Amber/Green).
56	Hatfield Forest ZOI: consider rating and impact and appropriate mitigation through conditions and S106 contributions. RAG rating criteria need to be included in SLAA methodology	The final SLAA Methodology has been revised to remove the scoring of individual site characteristics by RAG ratings (Red/Amber/Green). The Zone of Influence of Hatfield Forest was updated to 10.4km in August 2022. Mitigation of recreational impact on Hatfield Forest is advised by Natural England. Approach to contribution to the mitigation strategy is under discussion with neighbouring Local Authorities, Natural England, National Trust and Essex place Services.
57	What is the definition of Important Woodland?	Important woodlands are referenced in paragraph 5.13 of the 2005 Local Plan. They are a local designation, recognised by Uttlesford District Council and are identified on the Council's Constraints Map in the layer titled 'Local Plan - important woodlands'.
58	Local Wildlife Sites - Question whether there should be differentiation between sites that intersect and adjoin LoWS	Noted. The final SLAA Methodology has been revised to remove the scoring of individual site characteristics by RAG ratings (Red/Amber/Green).



Uttlesford District Council
Local Plan to 2040
Draft Site Selection Methodology
for Housing and Employment
Options

November 2022

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Introduction

Uttlesford District Council is preparing a new Local Plan to replace the Local Plan adopted in 2005.

One element of the Local Plan will be to identify site allocations for housing, employment, retail and other development uses. This report sets out the methodology for assessing sites for inclusion in the Local Plan.

The selection of sites to be recommended for inclusion, (i.e. included in the Local Plan), will be an iterative process. Initially, sites will be assessed through a primarily desk-based approach to identify the development potential of sites using information that the Council has researched and collated.

There are five stages to the site assessment:

Stage 1: Initial Site Identification

Stage 2: Sustainability Appraisal Stage

Stage 3: Compliance with New Local Plan Policies Stage

Stage 4: Deliverability of Sites Stage

Stage 5: Site Appraisal Conclusions and Recommendations

It is likely that this initial process will result in a list of 'reasonable alternatives' or provisional sites at Draft Local Plan stage. As the process progresses, further detailed studies (for example, in terms of transport, flood risk, landscape, historic environment, deliverability and viability issues) will help inform the final consideration of sites. This additional information will result in the assessments for relevant sites being refined to take account of the new information as the Local Plan progresses towards plan submission stage and examination.

Further sites may be submitted to the Council for consideration as potential allocations in the Local Plan in the future during the plan making process. However, there will need to be a cut-off point in order that the plan can be completed as soon as possible. The submitted sites will be assessed for inclusion in the Local Plan and included in future Local Plan consultations.

Stage 1 – Initial Site Identification

The site assessment process considers sites that are developable (or part developable where it meets the site size threshold below) as assessed through the Strategic Land Availability Assessment (SLAA). It includes sites:

- Submitted through the 'Call for Sites' (the most recent being January - April 2021)
- Previously included in the SLAA and / or Employment Land Review

- Additional sites promoted through Local Plan consultations and outside of official 'Call for Sites' exercises (sites will be included at the next point where an assessment can take place).

A developable site is one that is in a suitable location for housing, employment or other development and there is a reasonable prospect that the site is available and deliverable i.e. could be viably developed at the point envisaged within the plan period.

The SLAA uses the following site size thresholds:

- 0.2 hectares (or 5 dwellings) for housing sites.
- 0.25 hectares (or 500m² floorspace) for employment sites.

Stage 2 – Sustainability Appraisal

For each developable site, the sustainability appraisal considers a range of environmental, economic and social factors which reflect the objectives of the Sustainability Appraisal Framework.

For employment and retail sites, different factors are included to take account of specific elements for employment uses and the locational requirements of different economic sectors.

The following are the sustainability appraisal framework factors against which sites will be tested:

- Communities
- Health and wellbeing
- Economy and employment
- Equalities, diversity and social inclusion
- Transport, air quality and noise
- Climate change (adaptation and mitigation)
- Impact on biodiversity
- Land and water resources
- Landscape sensitivity
- Historic Environment
- Biodiversity and geodiversity
- Minerals and Waste
- Agricultural land classification
- Water protection
- Employment land
- Access to strategic transport routes
- Regeneration and brownfield site opportunities
- Access to public transport
- Access to community infrastructure

A summary of the Sustainability Appraisal for each site is included on the site assessment sheet. This will ensure that the findings of the Sustainability Appraisal and the site assessment process will inform the selection of the most appropriate sites for inclusion in the Local Plan.

Stage 3 – Compliance with New Local Plan Policies

The emerging Local Plan will propose a number of policies that give locational or other guidance in terms of housing, employment land or other development. These are used to filter out sites that do not comply with the policies.

The emerging Local Plan policies are to be refined throughout 2022/23, once developed sites are assessed against the policy compliance criteria. As an example, criteria are set out in Table 1, however this is not a closed list and will be further refined. The approach will be different depending on whether the site is being considered for housing, employment or retail uses. This section will need to be updated once these policy areas are finalised. For example, a reassessment of the settlement hierarchy may impact on the site assessments.

Table 1 – Consistency with Emerging Strategy

Criteria	Comment
What is the site’s position in the emerging settlement hierarchy?	Identifies whether the site is within or adjoining a settlement and where this aligns with the Local Plan Settlement Hierarchy, e.g main settlement or village.
Areas of Protection:	Is the site in Green Belt, Countryside Protection Zone or Open Countryside. Identifies whether the site is located in an area of land currently designated.
Flood risk:	Is the site affected by Flood Zone 2 or 3? Yes / No, and a statement of the percentage of site within Flood Zone 3 based on Environment Agency data.

Stage 4 – Deliverability of Sites

This stage considers whether or not the site is deliverable and the timescales and phasing of delivery. This includes consideration of:

- Land ownership
- Access to the road network
- Key infrastructure requirements and capacity issues
- Lead-in times, delivery rates and market capacity
- Barriers to delivery
- Delivery approaches
- Dwelling or floorspace capacity taking into account constraints and other relevant factors (that is likely to be delivered during the Plan period)

Stage 5 – Site Appraisal Conclusions and Recommendations

The final stage of the process is to draw conclusions and to make recommendations about the suitability of the site for inclusion in the Draft Local Plan. These will be based on professional planning judgement and take account of:

- Sustainability Appraisal
- New Local Plan Policies
- National planning policies (e.g. NPPF)
- Deliverability of Sites
- Any other relevant factors

In practice, this is a complex and ongoing two (or more)-way process. The choice of any one site will depend on the availability and comparative merits of others in the locality. The number of allocations (or more specifically the amount of homes or employment provision they could provide) needed in any one settlement will be dependent on the quantum available in other settlements, the balance between existing settlements and new communities, the spatial distribution across the District, and how facilities and infrastructure upgrades can best be delivered. Thus, the spatial strategy will be developed based on the emerging quantum and qualities of the potential allocations, and vice-versa.

A site assessment sheet, as set out in Appendix 1, will be prepared for each potential site. The conclusions will set out whether or not a site is recommended for inclusion as a site allocation in the Draft Local Plan. It will also set out the main reasons to explain why a site is included or not, and the pros, cons, and considerations if site the site is developed and final conclusions.

A site specific policy will be included in the Plan for each site allocated, indicating the type and amount of development to be encouraged, together with any site or locality specific conditions to be met and considerations to be addressed.

The recommendation of potential allocations will then be included within the Draft Local Plan (Regulation 18) to be consulted in Summer 2023. The justification and officer recommendation for the potential allocations will be considered by Local Plan Leadership Group and then Council in deciding the potential allocations within the Local Plan.

Appendix 1 – Site Assessment Form

Stage 1	
Initial Site Identification	
Criteria	Comment
Site reference	Site reference, taken from SLAA
Site Name (Parish)	Site address, taken from SLAA (parish in brackets)
Proposed use	Housing / Employment / Mixed Use/ Other use
Size in hectares (developable area and reason)	Size in ha (Developable area in ha, justification)
Size in dwellings (density, dwelling per hectare)	Number of dwellings (density as dwellings per hectare, e.g. 35dph based on the Council's evidence, taking account of site promoter's information.
Grid Reference	E Eastings N Northings
Current use (previously developed?)	Description of current use (Yes, No, Mixed)
Stage 2	
Sustainability Appraisal Summary	
Criteria	Comment
Positive Scores	Summary of positive scores taken from the Sustainability Appraisal
Negative Scores	Summary of negative scores taken from the Sustainability Appraisal
Stage 3	
Consistency with Emerging Strategy	
Criteria	Comment
What is the site's position in the emerging settlement hierarchy?	Refinement of the Settlement Hierarchy will determine the sites position in the settlement hierarchy.
Area of Protection is the site in Green Belt, Countryside Protection Zone or Countryside? Identifies whether the site is located in an area of land currently designated.	Yes (if so, state which) / No, information taken from Local Plan Policies Map 2005
Flood risk: is the site affected by Flood Zone 2 or 3?	Yes / No, and statement of percentage of site within Flood Zone 3 based on Environment Agency data, taken from SLAA
Stage 4	
Deliverability of Sites	
Criteria	Comment
Land ownership	Identification of who owns the site, presence of any covenants and land agreements. Informed by Call for Sites submissions and any required Land Registry/Site Survey responses.
Access to the road network	Does the site have access to the road network and are there significant concerns about access; informed

	by ECC Highways comments in SLAA and Site Survey's undertaken by officers.
Key infrastructure requirements and capacity issues	Identification of any key infrastructure requirements and whether there are infrastructure capacity issues in the vicinity
Lead-in times, delivery rates and market capacity	Estimated lead-in times and delivery rates provided by site promoters and Council assessment of achievability. Informed by Call for Sites submissions, Site Survey responses and Council data.
Barriers to delivery	Identification of any physical constraints to delivery or covenants. Informed by SLAA assessments and Site Survey responses.
Delivery approach	Who owns the site and how it could be developed. Informed by Call for Sites submissions and Site Survey responses.
Net dwelling (or floorspace) capacity within plan period	Information taken from SLAA and informed by site promoter's estimate, conclusions from above criteria based on previous completions data held by the Council.
Stage 5	Conclusion and Recommendation
Criteria	Comment
Positive Attributes	+ Summary of positive attributes +
Negative Attributes	- Summary of negative attributes and areas where further investigation is required -
Recommendation	Reasonable option that requires further assessment / not a reasonable option due to significant concerns about sustainability and / or deliverability.

Committee: Local Plan Leadership Group

Date: 10 Nov 2022

Title: Upcoming Local Plan Team Publications

Report Author: John Clements, Interim Local Plans and New Communities Manager

JClements@uttlesford.gov.uk

Summary

1. The Report is to advise the Leadership Group of a series of documents intended to be published in the near future.

Recommendations

2. That the Leadership Group notes
 - a. the upcoming publication of the documents detailed in the report;
 - b. the improved 5 year housing supply situation; and
 - c. the imminent consultation on the Developer Contributions Supplementary Planning Document.

Financial Implications

3. None.

Background Papers

4. Report and Minutes of Cabinet 29 March 2022, Agenda Item 12, 'Developers' Contributions Guidance Supplementary Planning Document – Approval for Consultation'
5. Report and Minutes of Cabinet 20 October 2022, agenda Item 13 – Local Development Scheme

Impact

- 6.

Communication/Consultation	The availability of the various documents highlighted will aid communication and engagement by interested parties.
Community Safety	n/a
Equalities	n/a
Health and Safety	n/a

Human Rights/Legal Implications	n/a
Sustainability	n/a
Ward-specific impacts	n/a
Workforce/Workplace	n/a

Situation

7. The Local Plans team plans to publish the following items at various dates during the next few weeks.

5 Year Housing Supply Statement

8. The Leadership Group will be well aware that UDC (like very many other local planning authorities) cannot demonstrate the five year housing supply expected by government. This triggers the national policy 'presumption in favour of sustainable development', putting the Council in a very weak position in trying to resist planning applications for unwelcome types, locations or forms of housing development.
9. The headline result that UDCs housing land supply has increased from 3.52 year's supply in 2021 to 4.89 years this year, very close to the required 5 years. This is on the face of it encouraging, but the 'presumption in favour of sustainable development' will continue to apply (although in some case inspectors have reduced the weight to be given to the presumption, and dismissed appeals, on the grounds that it was near enough met), and the prospects for that level being increased, or even just maintained, for next year are not encouraging.
10. The 5 year Housing Land Supply statement is not quite ready to be published or presented to the Leadership Group, but it is intended to be published in the next few weeks, in order to get this factual information into the public realm and perhaps influencing decision makers as soon as possible. It is intended to bring the completed document to the next Local Plan Leadership Group meeting in order that some of the factors at play in reaching the achieved level of supply can be explained and considered by the Leadership Group.
11. The Leadership Group is asked to note the improved 5 year housing supply position and the intention to publish this shortly.

Revised Local Development Scheme

12. The Cabinet agreed, on 20th October, adoption of a revised Local Development Scheme reflecting the agreed new timetable for Local Plan preparation.
13. A Local Development Scheme informs the public and interested parties of the planning documents already adopted and, with timescales, those in preparation.

14. The Leadership is asked to note the intention to publish this very shortly.

Consultation Draft Developer Contributions Supplementary Planning Document

15. Cabinet agreed in March this year (see Background Papers) the publication for consultation of this document, with the timetabling of this dependent on resources and other priorities. In order to move towards getting such guidance adopted as soon as practicable, it is now intended to publish this for consultation mid-November or soon thereafter.

16. Member are asked to note the imminent publication, and invited to encourage responses to the consultation from interested parties.

Evidence Study Reports

17. As the Leadership Group will be aware a significant number and variety of evidence study reports have been procured to inform the development of the Local Plan content, and have had reports and presentations on a range of them. Occasionally officers are asked about these, or to be provided with copies of them. In the interests of openness it is intended to publish on the website as many of these as practicable, and as and when resources permit.

18. Note that these evidence studies are being published for information, rather than consultation. The team does not have the resources to enter into dialogue with members of the public on the content or use of these reports. The publication of the Draft Local Plan next summer will provide an opportunity for interested parties to input any views they may have on such matters into the Local Plan preparation process.

19. The Leadership Group is asked to note the intention to publish, from time to time, evidence study reports for information.

Risk Analysis

20.

Risk	Likelihood	Impact	Mitigating actions
1	1	1	1

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.