

CHAPTER 1 – Introduction

General Comments (No specific paragraphs referenced)

This text was responded to by 19 people and organisations.

	TOTAL
Support	2
Object	9
Comment	8

Overarching Summary

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

Statutory consultees and other bodies

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

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

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

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

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

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

Evidence:

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

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

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

Evidence:

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

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

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

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

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

Evidence:

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

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

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

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

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

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

Developers/landowners/site promoters

Individuals

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

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

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

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

Sustainability Appraisal June 2017

Not Applicable

What is the Local Plan?

Paragraphs 1.1 – 1.4

	TOTAL
Support	2
Object	19
Comment	7

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

Overarching Summary

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

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

Statutory consultees and other bodies

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

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

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

Developers/landowners/site promoters

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

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

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

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

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

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

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

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

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

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

Individuals

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

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

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

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

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

Sustainability Appraisal June 2017

Not Applicable

The Development Plan

Paragraphs 1.5 – 1.10

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

	TOTAL
Support	0
Object	6
Comment	6

Overarching Summary

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

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

Statutory consultees and other bodies

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

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

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

Developers/landowners/site promoters

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

Individuals

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

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

Sustainability Appraisal June 2017

Not Applicable

National Planning Policy

Paragraphs 1.11 – 1.12

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

	TOTAL
Support	0
Object	12
Comment	1

Overarching Summary

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

Statutory consultees and other bodies

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

Developers/landowners/site promoters

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

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

Individuals

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

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

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

Sustainability Appraisal June 2017

Not Applicable

Sustainability Appraisal and Habitats Regulations Assessment

Paragraphs 1.13 – 1.16

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

	TOTAL
Support	0
Object	19
Comment	19

Overarching Summary

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

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

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

Statutory consultees and other bodies

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Developers/landowners/site promoters

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1. It presupposes that the Site (and indeed all sites currently within the Green Belt) still merit continued allocation as Green Belt as per the previous Development Plan which this new Local Plan will supersede. Given that the NPPF is clear that the preparation of new Local Plans is the appropriate vehicle – the only appropriate vehicle – through which to make changes to the Green Belt boundary, the automatic rejection of any site that is within the current Green Belt clearly raises concerns as to whether such an approach can be considered justified.
 2. Green Belt is a policy designation, rather than a physical constraint to development. It is considered highly questionable whether sites which sit within the current Development Plan's Green Belt can be considered inherently less sustainable than those outside of it. As such, it is questioned whether a Local Plan that take such an approach can be considered justified.
 3. Notwithstanding national and local planning policy, it is a legal requirement, as per the Environmental Assessment of Plans and Programmes Regulations (2004), that all reasonable alternatives be considered and assessed to the same level of detail as the preferred approach. As a policy designation, a current Green Belt allocation cannot be considered to render a site incapable of being considered a reasonable alternative. It is clear that Green Belt boundaries are capable of being through reviewed through Local Plans, and indeed other authorities have done so in order to meet development needs.
- Site 01LRod15 has not been assessed through the Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) which accompanies the DLP. A reason given for the failure to consider the Site is not expressly stated within the SA/SEA. However, there is reference within Appendix 2, page 234 of the SA/SEA to sites that are currently within the Green Belt being filtered out, and not considered 'reasonable'. If indeed this is the reason for the failure to consider the potential allocation of the site, it raises three particular concerns:
 1. It presupposes that the Site (and indeed all sites currently within the Green Belt) still merit continued allocation as Green Belt as per the previous Development Plan which this new Local Plan will supersede. Given that the NPPF is clear that the preparation of new Local Plans is the appropriate vehicle – the only appropriate vehicle – through which to make changes to the Green Belt boundary, the automatic rejection of any site that is within the current Green Belt clearly raises concerns as to whether such an approach can be considered justified.
 2. Green Belt is a policy designation, rather than a physical constraint to development. It is considered highly questionable whether sites which sit within the current Development Plan's Green Belt can be considered

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

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

Individuals

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

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

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

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

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

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

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Not Applicable

Structure of the Local Plan

Paragraphs 1.17 – 1.19

This supporting text was responded to by 3 people.

	TOTAL
Support	0
Object	1
Comment	2

Overarching Summary

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

Statutory consultees and other bodies

No responses from statutory consultees or other bodies.

Developers/landowners/site promoters

No responses received.

Individuals

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

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

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Not Applicable