

CHAPTER 4 HOUSING

Introduction

Paragraphs 4.1 – 4.7

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

Support	-
Object	14
Comment	22

Overarching Summary

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

Statutory consultees and other bodies

East Herts District Council considers that the Plan is not clear on its approach towards Gypsies and Travellers and Travelling Showpeople, in that the text does not actually identify clearly what the needs are. The Plan describes the number of people interviewed but does not state what number of plots or pitches the Plan requires nor whether there are sufficient allocations to meet these needs. A criteria based policy is insufficient if there are needs to be met. The Plan does not seek to make provision for those who no longer meet the Planning policy for traveller sites definition i.e. Non-Nomadic Travellers. It is therefore recommended that further evidence is undertaken to clarify the position of the 'unknown' households to ensure that appropriate accommodation options are planned for. (paragraph 4.7)

Saffron Walden Town Council Paragraph 4.2 - Query greatest need is for 3 or 4 bedroom houses, the work of the Neighbourhood Plan show that 2 and 3 bed homes are the priority. That requirement should be based upon policies within the Neighbourhood Plan and within good practices as detailed in the South Cambs Local Plan. In paragraph 4.3 they consider the text should be amended to read "necessarily require *or qualify* for subsidised affordable housing"

Elsenham Parish Council supports the provision of affordable housing and housing for the elderly. It considers that where the greatest housing need lies across the district is a matter which town and parish councils should be consulted on and so without the necessity for the production of Neighbourhood Plans,

Thaxted Parish Council query that greatest need is for 3 or 4 bedroom houses, this is contradicted on page 54 under Housing Mix 4.10 where it is stated whilst the greatest need for affordable housing units is for 2 and 3 bedroom houses. In addition to this, the work of the emerging Thaxted Neighbourhood plan suggests that the need is for 1 or 2-bedroom affordable homes. In paragraph 4.3 they consider the text should be amended to read "necessarily require *or qualify* for subsidised affordable housing"

Stansted Mountfitchet Neighbourhood Plan Group considers that a policy is needed on regenerations as a lot of people live in below standard housing.

We Are Residents considers that there should be a specific policy on minimum space standards for new homes.

Developers/landowners/site promoters

No comments received

Individuals

- Concerned about capacity of utilities and lack of infrastructure planning
- no audited data that identifies the number of houses required
- No mention of specifics re sustainability- new housing should be carbon neutral and include solar panels, grey water systems and ensure that there is drainage for ground rain water run off and capture of roof run off water.
- Concerned about scale of housing needed
- Do not agree that greatest need is for family housing.
- The use of the term 4+ bedrooms can justify the building of huge houses. The + should be removed.
- The last sentence of paragraph 4.2 should read that the greatest need is for *market* family housing.
- As well as meeting the needs of existing residents, the Plan is also having to judge the needs of people moving into the District.
- Concerned about affordability of homes.
- Cheaper smaller studio apartments for young first time buyers need building, there ought to be a clause on purchasing that smaller units can only be bought by those with local connections. Safeguarding cheaper/smaller units from mass acquisition of landlords increasing their portfolios must be resisted.
- So what is the proposal for those not qualifying for affordable homes, but unable to buy on the open market? (paragraph 4.3)
- All new developments should have at least 10% instead of 5% open market bungalows. Good quality open-market 2 or 3 bedroomed bungalows with garages are what are required to enable older people to down size and free up family homes.
- The local self-build register contains around 143 groups and individuals (as of August 2017, from an FOI request) so what is the rationale for quoting a figure of two from a national website? Uttlesford should be doing more to promote self-build housing, including exploring how the planning system promotes 'developer-led' planning, at the expense of self-build. Promoting only serviced plots on developer led sites will not allow self-builds to increase the housing supply because it is these developers that are holding back supply to maximize their profit. (paragraph 4.5)
- Explain acronym PPG. (Paragraph 4.5)
- Self/Custom build would be far better met by small developments in the towns and villages where people are established and have friends and support. Moving them to a remote urban town with its lack of social infrastructure will lead to isolation with its associated problems and health effects. The same applies to moving young families away from family support. (paragraph 4.5)
- The District Council should build the opportunity to develop Carver Barracks into its long term plan. It would be an ideal place for a new town. It is a brownfield site and it

has all services including sports provision and open space. It could fund the part of the Saffron Walden Bypass. (Paragraph 4.6).

- As the building of garden communities will cover more than one plan period why is it not intended to allocate land for Gypsies and Travellers within the master plans to ensure future need can easily be accommodated? (paragraph 4.6)

Sustainability Appraisal June 2017

No policies to appraise.

Officer response

Proposed changes to plan

Housing Density Paragraph 4.8 and Policy H1

This policy and supporting text was responded to by 30 people/organisations.

Support	4
Object	9
Comment	17

Overarching Summary

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

Statutory consultees and other bodies

Saffron Walden Neighbourhood Plan Steering Group and **Stansted Neighbourhood Steering Group** consider that the Housing Density Chart negates any freedom for our NP to have a say on what housing should look like as densities are so high. Minimum requirement of 30dph was removed by government in 2010. They suggest that no densities to be given and policy is reworded to say that “densities are as outlined in the relevant Neighbourhood Plan and determined according to the character of the settlement. In the absence of an up-to-date neighbourhood plan then densities should average around 30dph.” The same comment is made by **Saffron Walden Town Council** who adds that this density accords with both the South Cambs and East Herts local plans.

Thaxted Parish Council consider that this policy should be amended to state as led by local demand and outlined in the emerging Neighbourhood Plan and according to the character of the area.

The **Thaxted Society** support the policy

We are Residents believe that the proposed housing densities are much too high, and are considerably higher than comparable authorities. Recent development, when equivalent

housing densities have been in operation, has been very poor quality with homes tightly packed in and very little green space, and continue to lead to neighbour disputes over parking and children playing outside. It is also not clear to us how these levels of housing density are compatible with the garden community principles. Either these provisions should be removed, and a principle adopted of appropriate densities, as East Cambs has done, or an average density figure of 30 dwellings per ha be adopted. No higher average figure should be permitted. Additionally the policy needs to recognise Neighbourhood Plans, and state that "Policy H1 only applies if housing densities have not been identified in a respective Neighbourhood Plan".

Developers/landowners/site promoters

- Policy supported
- the policy needs to employ an element of flexibility to allow the design of schemes to reflect a particular location, or to address local issues.
- the upper end of the density ranges proposed appear a little high for the character of the settlements within Uttlesford, particularly rural locations.
- high densities suggested are generally not achievable particularly taking into account parking and amenity space required.
- Housing density should be design led and not a simple reflection of applied average densities. The NPPF places significant weight on the quality of design. It is therefore recommended that this policy should be omitted from the plan.
- Policy should make clear that specialist forms of housing, including housing for the elderly may, are likely to achieve higher densities as a result of their form.
- The policy refers to density requirements for development that would be adjacent to any settlement, so there has to be some allowance for minor expansions to settlements beyond the guidance lines that are drawn by the development limits boundaries?
- Lack of clarity as to housing density policy as it relates to the Garden Communities and where this will be set out. The development framework is considered the most appropriate document.

Individuals

- Policy supported
- We should be aiming for much lower densities for rural homes as both houses and plots have been getting smaller.
- Modern housing density is unsustainable and doesn't allow proper living and breathing space. Historically, housing had some land available to grow some food for oneself.
- These densities are far too high and 20dph would be appropriate for a 'soft edge' to towns and villages.
- Clarification required in paragraph 4.8 as no specific numbers on " need" or any detail where they might be located.
- The density should relate to that shown in any relevant Neighbourhood Plan and reflect the nature of the settlement.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

It is important that development density is appropriate to make maximise the potential quality of proposals, to make the best use of the land available, to reduce the amount of Greenfield land being used for sites on the edge of settlements and to respect the character of the area. Paragraph 47 of the NPPF requires local planning authorities to significantly increase the supply of housing by setting out their own approach to housing density which reflect local circumstances. The densities indicated within the policy reflect broadly suitable thresholds for the district's towns and villages. Importantly, the addition of exception criteria ensure that the local and site specific context is at the forefront of development. This will ensure positive impacts on landscape, townscape and the natural and historic environment through their protection from both development within and outside development limits and also the proposed new settlements.

Alternatives Considered

The National Planning Policy Framework requires Councils to make sure housing densities are appropriate for different areas. With this at the forefront of the Policy's approach, and in line with the evidence outlined in the emerging evidence (SHMA), there can be considered no reasonable alternatives that exist for exploration.

Proposed Mitigation Measures/Recommendations

No mitigation measures or recommendations are proposed at this stage.

Officer response

Proposed changes to plan

Housing Mix

Paragraph 4.9 and Policy H2

This policy and supporting text was responded to by 35 people/organisations.

Support	6
Object	16
Comment	13

Overarching Summary

- Greater need for smaller properties.

Statutory consultees and other bodies

Elsenham Parish Council does not agree that it is possible to state the most appropriate housing mix across the District. This is a matter on which parish council's should be consulted, without the necessity for Neighbourhood Plans.

Saffron Walden Town Council consider that the policy should not include a significant proportion of 3 & 4 bedroom market housing, as this does not cater for families that do not qualify for affordable housing and cannot afford 3 & 4 bedroom houses. It is proposed that the policy should say 2 & 3 bedroom affordable Market housing. The Housing mix should be similar to South Cambs:- 30% 1 & 2 bed, 40% 3 bed and 30% 4 bed or as outlined in the Neighbourhood Plan for the area. **Thaxted Parish Council** similarly consider that the policy should be amended to read 2 & 3 bedroom affordable market housing to meet the needs of people who need this size property but do not qualify for affordable housing. Littlebury Parish Council consider the mix inappropriate. Given that the national average household size is 2.4 people, more people are living alone, and that the District has an above average age profile, a very much higher proportion of dwellings in all tenures should have 1 and 2 bedrooms. This would provide more suitable housing for both younger and older residents, reduce the need for younger people to move away to find affordable accommodation and produce more balanced communities. Due to the rising in age of the population, suitable accommodation for the elderly would be a requirement, designed to be integrated with the community on each site. Good quality sheltered accommodation, dementia villages or similar, and some housing suitable for multi-generational families should be provided to facilitate choice.

Saffron Walden Neighbourhood Plan Steering Group and **Stansted Neighbourhood Steering Group** consider that the Housing Mix given is completely out of kilter with normal densities and the reason given by ORS for a high percentage of larger properties is unscientific. ORS have based their figures on the results of the 2011 census showing high growth in Uttlesford but a lot of East Europeans live in large numbers in town houses to keep their rental costs low. The current guidelines will result in too many expensive homes. Given the current evidence that there are a lot of people wishing to downsize (BBC news of 2nd August 2017), there is no argument for building more 4 bed houses than the norm (24% for 4 and 5 bed). Also see the English Housing Survey. Suggestion: Market housing should prioritise large 2 bedroom and 3 bedroom houses. 5% provision of bungalows is not enough as the average in England is already higher than that so will lead to a deficit. There will be areas where bungalows are inappropriate e.g. town centres but where they are, e.g. moderate sized housing developments, then 10% could be included to help with downsizing to free up family homes. Suggest that in terms of size percentages should be: 9% 1 bed 23% 2 bed 44% 3 bed 24% 4 bed plus. The housing mix should be up to the individual Neighbourhood Plan.

Thaxted Society supports the provision of low cost housing and the provision of assistance for first time buyers.

We Are Residents disagree with the conclusion drawn from the SHMA and believe that 2 and 3 bedroom houses should be prioritised for market housing as well. The emphasis on 4 bedroom houses in Policy H2 is not appropriate and should be deleted. Additionally the policy needs to recognise Neighbourhood Plans and state that "Policy H2 only applies if a preferred housing mix has not been identified in a respective Neighbourhood Plan

Developers/landowners/site promoters

- Support the policy in creating balanced and sustainable communities and meeting the needs of the district and evidenced by the most up to date Strategic Housing Market Assessment.
- A company providing an affordable housing model that delivers affordably rented homes to buy considers that the policy is not sufficiently flexible to reflect changing circumstances and evidence which may supersede the SHMA. They recommend that the policy is amended to read ‘... as evidenced by the most recent Strategic Housing Market Assessment and any other local evidence of need, having regard to ...’ □
- Lack of clarity as to housing density policy as it relates to the Garden Communities and where this will be set out. The development framework is considered the most appropriate document.
- Policy should exempt or make reference to the fact that specialist housing for older people is aimed at downsizers and will therefore most likely be in the form of one or two bedroom units.

Individuals

- Don't forget suitable accommodation on a single floor for the disabled and not to allow later buyers to add a storey to bungalows thus reducing this type of housing stock.
- There is a need for market bungalows for residents who wish to downsize..
- The lack of one and two bedroom affordable houses in this proposed mix does not seem to reflect UDC's Housing Strategy, which highlights the need for many smaller and affordable properties.
- There is a need for 1, 2 and 3 bed properties to meet the needs of young people wishing to buy their own home.
- The data is skewed by multiple occupancy of rooms. The actual need for long-term Uttlesford residents, and for those with families, is for smaller homes.
- A genuine mixed society needs a genuine mix of housing which includes - one bedroom dwellings, family homes of various sizes and bungalows (always low priority) as well as larger properties for the more affluent. In addition, to prevent the talent drain, a percentage needs to be reserved for local people.
- The mix of housing provided in the Garden villages should reflect the jobs/income/qualification levels of the 14,600 new jobs projected to be created in the district during the Local Plan period. Over 50% of these jobs will be in support roles like retail, warehousing, offices, education and other services. Many of the jobs are likely to be at the lower end of the income scale.
- Should it make it clear that a request for variation of a Section 106 agreement will only be considered in exceptional circumstances?

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

In order to create sustainable, inclusive and mixed communities, it is important to plan for a mix of housing which creates greater choice and meets the housing needs of an area.

Paragraph 50 of the NPPF states that local authorities should ‘plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community.’ This policy will have significant positive impacts on addressing

current local housing needs in terms of dwelling sizes and types to the benefit of appropriate growth and social inclusion. There will also be positive impacts on townscape where the policy requires development proposals to consider the local character of the area when determining housing mix. Despite these positive impacts, there is a small degree of uncertainty surrounding the historic environment and exceptions to the policy regarding the suitability of a development mix in Conservation Areas.

Alternatives Considered

The National Planning Policy Framework requires Councils to plan for a mix of new housing based on current and future demographic trends, market trends and different groups within the community. With this at the forefront of the Policy's approach, and in line with the evidence outlined in the SHMA, there can be considered no reasonable alternatives that exist for exploration.

Proposed Mitigation Measures/Recommendations

The Policy could make reference to the protection of the historic built environment as a physical reason why a housing mix cannot be achieved in some instances related to the protection and enhancement of specific designations such as Conservation Areas. The Policy could also include the Council's approach to any self-build home applications that might come forward in the plan period.

Officer response

Proposed changes to plan

Subdivision of Dwellings Paragraph 4.11 and Policy H3

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

Support	3
Object	4
Comment	4

Overarching Summary

- Ensuring sufficient off street parking

Statutory consultees and other bodies

Saffron Walden Town Council and **Thaxted Parish Council** consider that the policy should be amended to read that sub-division of a flat/ property will not be allowed where the dwelling is in a flood risk area and the flat is created with no access to a 1st floor level for refuge. **Takeley Parish Council** considers that the current policy creates an unacceptable level of street parking; and loss of communal garden affects street scene, character or

identity of the area. The policy needs to be reworded to define that street parking will not cause loss of amenity or congestion as a result of sub-division

Saffron Walden Neighbourhood Plan Group and **Stansted Mountfitchet Neighbourhood Plan** group consider that there should not be a policy encouraging this. More help needs to be given to young people. **Thaxted Society** supports the policy.

Developers/landowners/site promoters

No comments received

Individuals

- Off-street parking that reduces garden space be required to be permeable to reduce water run-off in heavy rain.
- Policy supported
- Policy objected as it can lead to substandard living conditions and unforgiving neighbourhoods
- The plan should state where parking standards, design guides can be found. What is meant by the phrase Local Standards?
- Permission should not be granted if it involves the loss of off-road parking. On-road parking is intense in some parts of the district and development which increases on-road parking should be resisted.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

The subdivision of dwellings and the change of use to multiple occupancy can provide additional homes and accommodation to help meet the district's housing need. The policy also seeks to protect aspects of townscape by placing restrictions on development which is likely to be detrimental to the character of the area. A criterion that there is no detrimental effect resulting from noise and disturbance positively impacts on elements of pollution control. There will be no impact on the historic environment from the implementation of this policy.

Alternatives Considered

An alternative of not having a policy on the subdivision of dwellings and dwellings in multiple occupancy may adversely affect the character of the area through an intensification which may comprise on-street parking, the use of garden space for car parking, an increase in overlooking or adjacent properties and general noise and disturbance. The Council believe that having a policy on the subdivision of dwelling would mitigate or prevent these adverse issues from arising, hence this alternative was rejected. It is also ensures that the size of housing necessary to meet the housing mix needed in the district, is retained.

Proposed Mitigation Measures/Recommendations

No mitigation measures or recommendations are proposed at this stage.

Officer response

Proposed changes to plan

Residential Extensions and Replacement Dwellings Paragraphs 4.12 – 4.13 and Policy H4

This policy and supporting text was responded to by 6 people/organisations.

Support	2
Object	2
Comment	2

Overarching Summary

- Concern over consistency of policy with national guidance.

Statutory consultees and other bodies

Thaxted Parish Council considers that the policy should be amended to state that the applicant must state why the proposed footprint is larger than the existing footprint.

Saffron Walden Neighbourhood Plan Group and **Stansted Mountfitchet Neighbourhood Plan** support the policy

Thaxted Society considers that the policy is weak and doesn't prevent development by the back door and increasing built forms in the countryside. This policy should also consider summer houses, garden sheds, chicken houses often very large, cabins, work spaces, gazebos, pool houses, studios, neo agricultural buildings with the sole purpose of preventing a new footprint in open countryside. In every instance planning requirements should include proof of need, and allied to this some on-going proof of use .

Developers/landowners/site promoters

None received

Individuals

- The policy title should include the Countryside Protection Zone
- The Policy is demonstrably unsound, and requires substantial amendment because:
 - It is not consistent with national policy: Paragraph 89 of the NPPF restricts size of extension or replacement dwelling by reference to that of the existing dwelling, only in Green Belt areas.
 - It is over-prescriptive, going further than is necessary to ensure that extensions or replacement dwellings within the Countryside are permitted only where they comprise sustainable development suitable for their context: It applies to the

whole Countryside, development restrictions which exceed those applied by paragraph 89 to Green Belt areas only. It would serve to restrict well-designed and innovative development in circumstances where no material planning harm would arise.

The need for a separate policy setting additional design criteria for replacement dwellings on sites outside the Green Belt and Countryside Protection Zone has not been demonstrated, and therefore Policy H4 is unsound. This representation takes no position as to whether a separate policy dealing with house extensions is required, because that does not directly affect us in the same way.

In the alternative, if it is demonstrated that the policy dealing with replacement dwellings should apply to sites outside the Green Belt and Countryside Protection Zone, a preferable alternative policy is proposed which would separate development controls into:

1. those applicable to extensions or replacement dwellings within the Countryside beyond both the Green Belt or the Countryside Protection Zone. This would contain fewer and less prescriptive criteria which are aligned to the NPPF, NPPG and consistent with draft Policies SP10, C1, D; and
2. those applicable to extensions or replacement dwellings within the Countryside within both the Green Belt and the Countryside Protection Zone. This would contain criteria aligned to para 89 of the NPPF.

Alternative proposed policy.

If a separate policy is deemed justified the following wording would overcome the objection.

- 1) House Extensions and Replacement Dwellings in areas of the Countryside beyond both the Green Belt and the Countryside Protection Zone.

Proposals to extend or replace existing dwellings within areas of the Countryside which are beyond both the Green Belt and the Countryside Protection Zone will be permitted provided that the scale, form, massing and height of the proposed extension or replacement dwelling is appropriate to the local context of the site and to the character of the surrounding landscape.

If the proposed replacement dwelling is not on the footprint of the original, the existing house will be required to be demolished within a month of the first occupation of the new house. In order to make sure that the new dwelling remains of a size appropriate to the local context of the site and to the character of the surrounding landscape, permitted development rights may be removed.

- 2) House Extensions and Replacement Dwellings in areas of the Countryside within both the Green Belt and the Countryside Protection Zone.

Proposals to extend or replace existing dwellings within areas of the Countryside which are within both the Green Belt and the Countryside Protection Zone will be permitted provided that:

- The extension or alteration of a building does not result in disproportionate additions over and above the size of the original building;
- The replacement building is in the same use and not materially larger than the one it replaces.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

The Policy will help to ensure that the character of Uttlesford's landscape and its Greenbelt are protected through controlling the amount of new development acknowledging that the erection of replacement dwellings and extensions to existing houses can individually, and cumulatively over a period of years, have an adverse impact both on the character of individual properties and their surroundings. It is considered that this Policy approach is compatible with those regarding the historic environment, specifically Listed Buildings, and those protection Policies surrounding landscape and the countryside.

Alternatives Considered

It is considered that any deviation from the Policy approach could be considered unsustainable in line with a need to ensure such provision (and a trend for the conversion of existing facilities) or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures/Recommendations

No mitigation measures or recommendations are proposed at this stage.

Officer response

Proposed changes to plan

Residential Development in Settlements without Development Limits Paragraph 4.14 and Policy H5

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

Support	3
Object	4
Comment	6

Overarching Summary

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

Statutory consultees and other bodies

Historic England supports the policy and its requirement for development to have regard to the historic environment and setting of buildings.

Saffron Walden Town Council and **Thaxted Parish Council** consider that the policy should define 'unreasonably small' and the policy should refer to the Essex Design Guide. **Takeley Parish Council** considers that the policy should be amended to prevent development which leads to coalescence to protect the individual character and identity of areas.

Saffron Walden Neighbourhood Plan Group and **Stansted Mountfitchet Neighbourhood Plan** consider that the policy is not specific enough; it should specify conformity to the Essex Design Guide. A specific policy on garden sizes is needed – a given area is required, no more than 2/5 of the garden should be in shade on 21 March, 3 storey homes should have south facing gardens where possible.

Thaxted Society support the policy

SERCLE (Stop Erosion of Rural Communities in Local Essex) The BDC/ NEGC justification for Garden Towns is prompted by the need to provide affordable and social housing. There is a belief that smaller sites are not viable due to Section 106 agreements on smaller sites, in that those with less than 10 homes are not required to comply and therefore provide social or affordable housing. The assertion is that building a 'Garden Town' is thus the only way of providing affordable housing. This is quite simply incorrect. TCPA have published a resource document for Councils detailing a variety of methods by which social and affordable housing in rural areas can be provided and this document specifically does not recommend a Garden Town as the solution.

We Are Residents consider that specific minimum garden sizes should be included, in accordance with the Essex Design Guide, and that these should not be departed from. Additionally the policy needs to recognise Neighbourhood Plans and state that "The garden space part of Policy H5 only applies if garden size not been identified in a respective Neighbourhood Plan."

Developers/landowners/site promoters

None received

Individuals

- Infilling between existing dwellings in rural areas would be a great idea, providing it was developed sympathetically. Development should be through small controlled pockets of housing spread throughout the areas and not concentrated into a huge expanse.
- Is the word "without" intended to mean the opposite of "within"? If not, what is this referring to? I object to a) the use of the word "overbearing" in number c which I think sets the bar too high. I suggest the words should be "significant or adverse"; b) to the lack of any requirement that a developer should be required to put in place mitigating measures to reduce or minimise the impact of any development on those

who would otherwise be affected; and c) to the lack of any requirement to maintain where possible trees (in order to avoid the areas being denuded of mature or semi-mature vegetation).

- This policy does not replace adopted policy H3 as stated in Appendix 1
- Something is needed to show which are the Settlements without Development Limits, and where an indication of settlement limits can be found.
- Development Limits are there to limit development; the policy should not introduce exemptions.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

Additional homes can be provided for through infilling between existing dwellings and through the development of other sites within villages; however it is important that such development is appropriate, well designed and well related to its surroundings and that the interests of neighbours are safeguarded. This policy supports the provision of housing to meet needs with regards to both supporting new small scale residential development and the protection of existing dwellings from inappropriate development. The criteria set out in the policy positively impact on a number of the Sustainability Objectives through seeking to ensure that development is not to the detriment of other issues. The criteria considers the impacts of development on neighbouring properties with regards to noise and increased vehicle movements and ensure that development would only be permitted if the natural and historic environments and the character of the area are protected. Furthermore, the policy has a positive impact on health through garden space requirements.

An alternative to this policy would be to

Alternatives Considered

Retain the Adopted Local Plan 2005 'backland development' policy and text with no changes / allow limited backland development. The NPPF sets out in paragraph 53 that, 'local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.' In conjunction with the NPPF's presumption in favour of sustainable development, including a policy on 'backland development' could be seen as accepting the principle contrary to the NPPF which would likely see an increase single dwelling residential proposals. Backland development has the potential to have adverse impacts on individuals and communities through the loss of amenity, overshadowing, noise, loss of green links, visual intrusion and loss of space between buildings, and can greatly disrupt a street scene. The Council feel that it is more suitable to address this type of development through restricting its viability in a more general policy and for this reason the alternative has been rejected.

Proposed Mitigation Measures/Recommendations

No mitigation measures or recommendations are proposed at this stage

Officer response

Proposed changes to plan

Affordable Housing Paragraphs 4.15 – 4.23 and Policy H6

This policy and supporting text was responded to by 64 people/organisations.

Support	8
Object	22
Comment	34

Overarching Summary

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

Statutory consultees and other bodies

Essex County Council recommends that in the supporting text that housing classified as 'independent living' is included within the definition of affordable housing. This would support the delivery of ECCs Independent Living programme, which seeks to provide market and social housing for those within this specialist housing category. ECC notes that section 4 of the Draft Local Plan refers to both affordable and sheltered housing as a need that has to be served. It is worth noting that often those who need housing assistance are less affluent and as such are more likely to be in need of good passenger transport links to enable them to undertake their daily life requirements. As such it would be beneficial for UDC to identify locations that are already well served (or planned to be) by public transport for such dwelling types. Section 4 does not currently include accessibility as a required criterion. The same principle applies to designated housing for older people. ECC recommends that this omission should be addressed.

Harlow District Council explains that the specific need set out for Harlow District is particularly challenging given the tight administrative boundaries of the district and wider viability issues. Further clarification will be needed to ensure that any unmet need that may arise in Harlow, are properly considered and that such need is met at sustainable locations.

Elsenham Parish Council considers that there is a lack of transparency as to the calculation of 14,100 dwellings stated in paragraph 4.17. **Saffron Walden Town Council** considers that the policy should make reference to Neighbourhood Plans; 40% affordable homes is considered too high; housing should be pepper-potted throughout the site; A viability test should be the exception, not the rule and certainly not the most important policy

point, there should not be an invitation for developers to evidence unviability – a viability statement should be submitted with the planning application and not after determination and there should be no alterations once permission is granted. It is suggested that the policy is revised in accordance with South Cambs Local Plan. Affordable housing should be based on truly affordable rents. **Thaxted Parish Council** similarly considers that the policy should make reference to Neighbourhood Plans. **Littlebury Parish Council** considers that the garden communities should not deliver less than 40% affordable housing.

Saffron Walden Neighbourhood Plan Group and Stansted Mountfitchet

Neighbourhood Plan are concerned that the policy does not provide for sites under 11 houses. The threshold of 11 houses should not apply for A and B villages. However, sites of luxury larger houses should provide for affordable housing. East Herts have a policy whereby sites of under 11 houses or over 1000 sq m of total floor area do have to provide for affordable housing. There should also be a policy saying that affordable housing should be pepper-potted throughout the site. They suggest that a viability test should be the exception, not the rule and certainly not the most important policy point; concerned that Affordable Housing is not truly affordable (c £240 per week) and there is a need social housing at affordable rents, even if it means providing a smaller percentage .

Thaxted Society supports the policy. **Sustainable Uttlesford** consider that the mix of housing provided in the Garden villages should reflect the jobs/income/qualification levels of the 14,600 new jobs projected to be created in the district during the Local Plan period. The plan must maximise the amount of socially rented housing in future developments to enable inhabitants on low or modest incomes to live and work in the district rather than be forced to move away. They consider that major employers like Stansted Airport have a significant role in enabling this increase in social housing. To ensure fairness and avoid exploitation Sustainable Uttlesford consider that private market housing in the main should be offered for sale on a freehold rather than leasehold basis. **Uttlesford Futures (Employment, Economy, Skills, Environment and Transport)** consider that the policy should include key worker homes and larger proportion of 'affordable' housing. **Uttlesford Citizens Advice Bureau** comments that using the insights gained from their clients they are aware of the chronic lack of affordable housing in the district. Uttlesford Citizens Advice therefore supports plans to increase the provision of low cost housing for rental and private purchase and would welcome the availability of more supported housing together with intergenerational accommodation that could provide solutions for households on low income because of care responsibilities. **We Are Residents** note that Policy H6 is at odds with the Monitoring Framework paragraph 17.1 provisions. Policy H6 requires 40% affordable housing, which with an annual housing requirement of 640 new homes equates to 256 affordable homes per annum. Paragraph 17.1 requires only 100 affordable homes per annum, and therefore should be amended to 256.

The **Home Builders Federation** does not consider that the Council's viability assessment of the policy to be effective in supporting the policy. The Council should set out how many affordable houses it is seeking to delivery during the plan period.

Developers/landowners/site promoters

Paragraphs

- Paragraph 4.18 of the Local Plan sets out the findings of the 2015 SHMA with regards to affordable housing. However, the paragraph appears a little confusing in that figures of 18%, 20% and 10% uplifts on base demographic figures are quoted without a clear understanding of what these uplifts are considered to address. This paragraph should be reworded so it is clear and transparent as to what is being suggested.
- Paragraph 4.22: A company providing an affordable housing model that delivers affordably rented homes to buy supports the policy and recommends that the policy sets out that supplementary guidance will be provided on the evidence required on viability. The SPG will ensure consistency across applications. The policy does not provide a target tenure mix, which provides the most pragmatic response to the varying needs across the District, however we do recommend the following amendment to the policy to reflect the emerging national planning policy position which indicates that 10% of all major residential developments should be delivered as affordable home ownership tenures, including rent to buy and starter homes. The tenure mix of affordable housing should reflect the most up to date local housing need evidence and viability on individual sites, including a range of housing that reflect local aspirations for affordable home ownership. This wording ensures that the policy will continue to reflect national policy without tying the policy to particular tenures. The final paragraph in this policy should also make reference to alternative affordable housing provision being made where this would be more suitable than requiring affordable housing is retained in perpetuity.
- Paragraph 4.22 – The tenure mix requirement should be sufficiently flexible to allow the tenure split between affordable rent or social rented tenure and shared ownership or intermediate housing tenures to be negotiated on a site by site basis to ensure the effectiveness of the plan in delivering affordable housing across the district, in accordance with local need of settlement

Policy

- Welcomes flexibility of policy
- Policy should make reference to starter homes
- In the absence of guidance it is unclear how local housing needs evidence and viability of individual sites will be assessed which creates uncertainty.
- Do not consider the Council's viability assessments to be effective in supporting its policy on affordable housing. Whole plan viability assessment needs to be revisited in line with Paragraphs 173-164 of NPPF.
- The plan does not, at present, identify how many affordable homes it intends to deliver during the plan period.
- The policy of 40% of the total number of dwellings proposed and similar arrangements in other authorities is counterproductive and a more sensible solution exists. 40% of the total number encourages the developers to propose lower density schemes with the open market element consisting of the largest houses the market will stand, thereby reducing the number of low cost houses provided. A more sensible route forward would be for the low-cost element to be a percentage of the total gross internal floor area as smaller houses generally fetch a higher price per m². This would be a market lead approach to providing a higher number of affordable houses making more effective use of land and coming closer to UDCs proposed

housing density targets. I would suggest a figure of 30% split 50/50 between social rented and starter homes. Shared ownership has no place as almost anymore that can obtain the funding for shared ownership can afford a low cost and would prefer to own outright which reduces dependency and a burden to the state purse long term.

- Policy not justified by evidence, as per the NPPF (paragraph 182). The latest evidence on affordable housing in the District is informed by the West Essex and East Hertfordshire Strategic Housing Market Assessment Affordable Housing Update (July, 2017). In contrast to the Council's current policy wording requiring 40%, the affordable housing update suggests a much lower need for 26% (see figure 21 of the affordable housing update).
- acknowledge that this policy is in line with the PPG(Paragraph: 031 Reference ID: 23b-031-20161116) which states that contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1,000 square metres (gross internal area)
- With the threshold of 10 units, there is a need for medium sized sites (50 dwellings) to deliver additional affordable houses.
- Lack of clarity as to affordable housing policy as it relates to the Garden Communities and where this will be set out. The development framework is considered the most appropriate document.

Individuals

Paragraphs

- The 2015 SHMA is unreliable given the uncertainty Brexit creates regarding economy, migration and immigration.
- The Plan should assist those who need assistance and position dwellings where the work is within Uttlesford. If you are a service sector worker then you need to be near the Market Towns and Airport. If you are a caseworker then you need to be near to your client's homes, hospitals and other relevant areas. If you are a rural worker then you need to be near your area of work. The idea of a North Uttlesford Garden Village fails to fulfil the needs of any of these examples.
- Paragraphs 4.15 to 4.17 refers to Housing Need and not Affordable Housing and should be entitled as such or refer to paragraphs 3.40-3.42 which contain the same information.
- Paragraph 4.16 is a good point at which to raise the option of building one, or more new standalone settlements, with appropriate infrastructure, rather than affecting so many smaller, existing communities.
- Paragraph 4.17: Where are the Government's new household projections? There is vagueness as to how the figures are determined. If more houses are built, the population will increase, but that does not mean that more houses have to be built.
- In paragraph 4.18 the uplift is exactly 20% and not more than.
- Paragraph 4.18: Object to the approach of the 2017 SHMA which justifies a lower uplift. The market signals uplift should be applied at a reasonable level to make up for the past failing to deliver sufficient land for new residential. We would therefore recommend that the Council use the 2014 Household projections as the starting point and then apply at least 20% uplift to take account of market signals.
- Support paragraph 4.20 but who will ensure the intent is actioned and maintained?

- Paragraph 4.22: local circumstances should be assessed by consulting local people.
- Affordable housing needs to be in the right places and not just in the Garden Communities as this does not meet the needs of those requiring affordable housing, it is almost a designed social segregation, wrong location for key workers, and wrong location for sustainable affordable housing.

Policy

- New housing is rarely affordable for young people / families starting out.
- The policy should not give developers the opportunity to argue unviability and exceptional circumstances.
- There seems to be no consideration of rented accommodation needed for young people.
- The viability assessment must be part of the Planning Application, and part of the public record. If the developer wishes to change the amount of social/affordable housing, a completely new Planning Application should be required. Experience to date indicates that the percentage of social/affordable housing provided is not open to public scrutiny, and that developers are able to plead changes in circumstances to reduce the percentage. Provision of social/affordable housing is central to all Planning Applications and should not be open to renegotiation.
- People on waiting list appears smaller than the number of houses being planned for.
- Housing demand projection for the area should be clearly assigned against its source and then clearly assigned against the corresponding number of houses. Then a sensible housing increase planned. A housing policy should not be based on building more and more houses until the price comes down to be affordable. So if we could never build enough to make market prices 'reasonable' the question is how many houses should be built. Enough for the people who live and work there plus an allocation for 'key workers' plus a small percentage growth rate? Massive inward investment from business (either from Stansted expansion or from bioclusters in Cambridge) should not, in my opinion, be a reason to build new homes at mass scale.
- Social renting must be a crucial and central aspect of housing provision or garden villages will be exclusive communities for the wealthy. "Affordable" housing at 80% market rates is unlikely to be affordable to those on low wages.
- Sites of 5 dwellings or over should make a contribution to affordable housing.
- The Council should begin a programme of its own social housing.
- Unclear as to definition of affordable housing.
- Guarantee that houses will be reserved for local, first time buyers with significant price reduction.
- Policy does not meet Garden Community principle listed in Appendix 4.
- Perhaps 40% affordable housing is too high and a lower percentage should be sought on the provision that more low cost housing for purchase by local people is provided? It would be better to have more social rented housing provided at reasonable rents and not so-called affordable.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

The NPPF states that where affordable housing is identified, local authorities should 'set policies for meeting this need, on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.' The Council's Developer Contributions Guidance sets out the tenure split, mix and distribution that it expects. Currently the tenure split is 70% affordable rented or Social Rented Tenure, 30% Shared Ownership Tenure. Affordable housing units will be normally distributed throughout the development in clusters of no more than 10 units, depending on the size of the development. The policy will have significant positive impacts related to affordable housing provision and associated social inclusion. The policy allows for flexibility to account for annual review, as stipulated in the supporting text. Affordable housing on-site or contributions to off-site provisions are required for all development over 5 dwellings ensuring that there will be a suitable supply of affordable housing. The supporting text also addresses the need for an appropriate mix of tenures and property sizes which would need to be agreed and determined by local circumstances, as well as consideration to the provision of specialist housing.

Alternatives Considered

Two alternative policy approaches have been identified as reasonable.

Alternative H6(a): To require developments on sites of 2-4 dwellings to provide a financial contribution to help deliver off-site affordable housing.

The alternative approach represents the previous preferred Policy of the 2014 Local Plan that was withdrawn. It represents an approach that in theory would maximise the amount of affordable housing in the District. Despite this, it is possible that the policy would prevent the viability of many small schemes and potential windfall sites that could come forward within the plan period. In addition, the approach would arguably conflict with the presumption in favour of sustainable development espoused in the Plan and the NPPF. For this reason, the alternative was rejected for a higher minimum limit to which financial contributions would apply for the delivery of off-site affordable housing.

Alternative H6(b): To retain the 2005 Adopted Local Plan policy (affordable housing only on sites of 15 dwellings plus)

The alternative approach represents the current 2005 Local Plan policy. It represents an approach that would not see any affordable housing requirements or off-site contributions below 15 dwellings. This can be seen as a high figure which, in consideration of the dispersed settlement patterns of the District, could see a significant undersupply of affordable housing in the District's smaller villages where development would only be appropriate in small schemes. For this reason, the alternative was rejected for a lower minimum limit to which financial contributions would apply for the delivery of off-site affordable housing.

Proposed Mitigation Measures/Recommendations

No mitigation measures or recommendations are proposed at this stage

Officer response

Proposed changes to plan

Affordable Housing on Exception Sites Paragraphs 4.24 – 4.25 and Policy H7

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

Support	4
Object	5
Comment	2

Overarching Summary

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

Statutory consultees and other bodies

Saffron Walden Town Council consider that the words 'or at any other site' are added to the first point and reference should be made to working with Town and Parish Council.

Saffron Walden Neighbourhood Plan Group and **Stansted Mountfitchet Neighbourhood Plan Group** support the policy but suggest that the plan should mention working with Parish Councils and Neighbourhood Plans.

Thaxted Society object to the policy as it incorrectly relies on the commercial viability of the development to provide low cost housing and removes all controls to enable a proportion of low cost housing.

Developers/landowners/site promoters

- There is no need for the inclusion of pure open market housing to aid the viability of affordable housing. It only artificially inflates the land value. A far more intelligent approach would be to allow a proportion of Starter Homes possibly in a ratio of anything between 1:3 to 3:1, this would provide a mix more in keeping with the need, not inflate the land value significantly and make both type of housing more genuinely affordable.
- Support the principle of policy but object that bullet points 1, 3 and 4 are not justified or consistent with national policy. Point 1 is too restrictive; point 3 should be amended to read 'within a reasonable proximity to the settlement' so as not to exclude certain locations; point 4 – there is no requirement in national policy for housing needs surveys to be prepared within 3 years.

Individuals

- Policy supported
- Object to the policy as the wording is sufficiently elastic as to allow all sorts of opportunistic applications
- Saying that the proportion of market housing should be the minimum to make the development viable is good, but a maximum percentage needs to be stated too.
- Current adopted policy, which is replaced by this policy states that 100% of housing should be affordable. Draft policy is too flexible.
-

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

Paragraph 54 of the NPPF states that local authorities should 'plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs.' The policy positively impacts upon the built and historic environment by ensuring that the size of the development is appropriate to the character of the area and townscape in the first instance. The policy also helps to meet an identified housing need. There will be significant impacts on social inclusion in so far as the policy recognises that where the market may not provide affordable housing in this manner yet seeks its delivery through permitting the principle of market housing to ensure viability.

Alternatives Considered

It is considered that any deviation from the Policy approach could be considered unsustainable in line with the need for affordable housing in such areas or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures/Recommendations

No mitigation measures or recommendations are proposed at this stage.

Officer response

Proposed changes to plan

Self Build and Custom Build Housing Paragraphs 4.26 – 4.30 and Policy H8

This policy and supporting text was responded to by 10 people/organisations.

Support	2
Object	1
Comment	7

Overarching Summary

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

Statutory consultees and other bodies

Saffron Walden Neighbourhood Plan Group and **Stansted Mountfitchet Neighbourhood Plan Group** ask how this would happen in practice and consider that it is important that it is not exploited but should enable people to have property tailored to their needs!

Thaxted Society support the policy that furthers imaginative schemes that allow and encourage access to sustainable home ownership

Developers/landowners/site promoters

- Lack of clarity as to how policy will relate to the Garden Communities and where this will be set out. The development framework is considered the most appropriate document
- The provisions of the policy can be met whilst significantly increasing supply and encouraging innovation and sustainability by encouraging development of self-build and custom homes provided it meets the following criteria
 - Type B Villages:- a) Utilises underused, previously used unproductive land. b) Is in or adjacent to the settlement; c) Is of suitable design; d) exceeds the energy performance requirements of the building regulation at the time construction commences by a minimum of 50% or carbon neutral whichever the lowest (this would more than offset any theoretical increase in energy consumption for additional travel distances).
 - Type A villages – as for Type A except d) is a minimum of 40%; plus e) Encourage small scale development of up to 30 house schemes where they provide clear community benefits which would help to make the settlements more sustainable i.e. School extensions, Community centres, Shops, Local employment centres
 - Key Villages:- as for Type B except d) is a minimum of 20%; plus f) encourage large scale development providing it contributes significantly to the cost of infrastructure improvements, i.e. Bypass, Sewage works.
 - Saffron Walden:- Allow sufficient extra housing on the outskirts of the town in order to fund the bypass and provide park & ride transport to carry loaded shopping trolleys and passengers based at or near Audley End railway station.
 - Great Dunmow:- Has generally well considered Neighbourhood Plan leave as proposed.

Individuals

- Currently the policy suggests that such proposals would be supported, but the policy needs to clearly state how factors such as lack of local public transport, or impact on landscape will be balanced against this support for self/custom build.
- More provision should be made and the idea promoted more widely.
- Affordable housing should be included within schemes of under 11 houses as well.
- Please tell us where to find NPPF
- Greater publicity should be given to self/custom build.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

The policy will have minor positive outcomes on the sustainability objective relevant to housing, through including a policy on self-build and custom homes. Impacts are limited due to the scale of possible development and its significance to contributing to housing need at the strategic plan level.

Alternatives Considered

It is considered that any deviation from the Policy approach could be considered unsustainable in line with the need for policy on self-build and custom homes in such areas or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures/Recommendations

Through iterative working, the SA process highlighted the need for a specific policy on, or mention of self-build homes within the housing mix policy. This recommendation has been incorporated into the plan at this Preferred Options stage. No mitigation measures or recommendations are proposed at this stage.

Officer response

Proposed changes to plan

Accommodation for Gypsies, Travellers and Travelling Showpeople Paragraphs 4.31 – 4.39 and Policy H9

This policy and supporting text was responded to by 93 people/organisations.

Support	9
Object	41
Comment	43

Overarching Summary

- Policy should refer to means of disposal of foul effluent.
- Need to clearly identify what the needs are and is approach of criteria policy sound.

- Need for further evidence on needs of those who no longer meet definition for planning policy purposes.
- Formally requested to evaluate evidence to determine whether there is the potential to assist in meeting the unmet need in Basildon for Traveller pitches prior to progressing Local Plan to Regulation 19.

Statutory consultees and other bodies

Environment Agency are pleased that the fifth criterion of this policy ensures that these sites should not be located in areas at risk of flooding. In terms of tidal and fluvial flood risk, where they include residential caravans that are considered to be highly vulnerable in Table 2 of the Planning Practice Guidance: Flood Risk and Coastal Change, these sites should not be permitted in Flood Zone 3, as demonstrated in Table 3 of this guidance. We welcome Policy H9 stating that the site is, or can be, connected to physical infrastructure including, among other matter, drainage. It should be noted that a private means of foul effluent disposal is only acceptable when foul mains drainage is not feasible (in terms of cost and/or practicality).

Historic England welcomes reference to protecting the natural, built and historic environment.

East Herts District Council considers that the Plan is not clear on its approach towards Gypsies and Travellers and Travelling Showpeople, in that the text does not actually identify clearly what the needs are. The Plan describes the number of people interviewed but does not state what number of plots or pitches the Plan requires nor whether there are sufficient allocations to meet these needs. A criteria based policy is insufficient if there are needs to be met. The Plan does not seek to make provision for those who no longer meet the Planning policy for traveller sites definition i.e. Non-Nomadic Travellers. It is therefore recommended that further evidence is undertaken to clarify the position of the 'unknown' households to ensure that appropriate accommodation options are planned for. (Paragraph 4.37)

Essex County Council comment that UDC should satisfy itself that the approach of not allocating any land is sound, deliverable and meets the requirements of national planning policy. **Chelmsford City Council** supports the Council in meeting its needs within its administrative boundary. **Basildon Council** object to the District's needs being met through a criteria based policy. Objections are raised because the evidence is based on a low number of interviews with gypsies and travellers; no consideration is given to the unmet need elsewhere in Essex. Uttlesford District Council is therefore formally requested to evaluate its evidence to determine whether there is the potential to assist in meeting the unmet need in Basildon for Traveller pitches prior to progressing their Local Plan to Regulation 19.

Henham Parish Council and **Ugley Parish Council** express concern that as the correctly defined need is not actually known. The text and policy needs to be along the same lines as Table 3.4 for housing; i.e. what is the need for the plan period as correctly defined; what existing commitments are; what is the remaining requirement and which sites are being allocated. **Arkesden Parish Council** supports the statement that there is no need for any additional pitches.

Saffron Walden Neighbourhood Plan Group, Stansted Mountfitchet Neighbourhood Plan Group and Thaxted Society support the policy.

Developers/landowners/site promoters

None received

Individuals

- The text lacks clear numbers on the 'need' for additional sites or any detail of where they might be located.
- While establishing criteria for future sites is welcome, it is important to identify potential sites so that the needs of travellers can be met within the time framework of the local plan. This is evidenced by incidents of travellers using car parks and other sites because of a lack of temporary and permanent site provision for gypsies and travellers.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

The Policy will have numerous positive impacts on social and environmental criteria in line with the need to provide inclusive access to accommodation for the Gypsy and Traveller communities. The Policy responds to meeting Traveller accommodation needs, represents an efficient use of land, and ensures access to facilities and the protection of environmental assets. Uncertain impacts however have been highlighted regarding flood risk; the Policy includes that sites are not located in an area at risk of flooding, however could be expanded to indicate what would and would not be acceptable in regards to proportions of sites that experience flood risk issues. Flooding which is a key issue for such a land use and can be considered to be more of a constraint than more permanent built development and general flooding related policy.

Alternatives Considered

No sites for Gypsy and Traveller provision were forthcoming through the Council's most recent call-for-sites process, the principle of which was in part to identify land for such purposes. It is likely at this stage that the Garden Communities will be required to incorporate a level of Gypsy and Traveller accommodation provision in order to meet any identified needs within the plan period.

Proposed Mitigation Measures/Recommendations

It is recommended that the Policy is expanded to indicate what would and would not be suitable in any forthcoming applications regarding flood risk, in response to the significance of impacts that flooding can have on this specific form of accommodation.

Officer response

Proposed changes to plan

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

This policy and supporting text was responded to by 26 people/organisations.

Support	3
Object	9
Comment	14

Overarching Summary

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

Statutory consultees and other bodies

Essex County Council welcomes reference to lifetime homes that are adaptable across the life-course. ECC is seeking to develop a range of supported living options and to commission services to support people living independently for as long as possible. It is therefore recommended that the [ECC Independent Living position statement](#) (2016) be referenced within this section of the Local Plan. The following text is recommended for inclusion in the Local Plan. *‘Essex County Council is the provider of social services in the District. Its Independent Living Programme is encouraging the provision of specialist accommodation in Essex as a means by which older people can continue to live healthy and active lives within existing communities. For Uttlesford District, ECC has set the target of delivering 73 additional units of specialist accommodation (33 through rental and 40 through ownership) to enable older people to live independently within the community by 2020. This target is set out in Essex County Council’s Independent Living Position Statement (2016). This approach to meeting the specialist accommodation needs of older people is intended to reduce the demand for residential/nursing home care, which is a considerably more expensive way of meeting the needs of older people, and can unnecessarily restrict independence within this age group’.*

Saffron Walden Town Council considers that the policy is the equivalent of the former Lifetime Homes policy and should apply to all developments regardless of size. The percentage for Category 3 should be 15% for both market homes and affordable homes.

Elsenham Parish Council supports the policy and has frequently drawn attention to the need for a greater provision of private sector bungalows, and it is held that the policy should be amended accordingly.

Saffron Walden Neighbourhood Plan Group and Stansted Mountfitchet

Neighbourhood Plan Group comment that in spite of having same SHMA, East Herts does not differentiate between market and affordable housing. It should apply to all new housing regardless of size of development. Suggestion: 15% Category 3 for both affordable and market housing regardless of size of housing development.

Uttlesford Futures (Employment, Economy, Skills, Environment and Transport)

comment that some evidence shows that grandparents are moving to the area to help with childcare while parents work, another factor increasing number of older people in the area.

Thaxted Society supports the policy but object to the inclusion of the caveat of 'where it is not practically achievable or financially viable'.

Developers/landowners/site promoters

- There is no supporting evidence for the need for such housing and therefore the policy is not justified and should be deleted.
- The current whole plan viability assessment supporting the local plan fails to consider policy H10 on Accessible Housing. This optional standard will increase the cost of providing each dwelling. In particular the highest standard, M4(3), will add a substantial additional cost that must be assessed as part of the viability study.
- There is no reference to development for C2 use. Figure 40 of the SHMA (2015) suggests a significant increase in the communal population for Uttlesford in particular (542 additional persons) between 2011 and 2033. The Plan recognises the need for sheltered and extra care accommodation and Appendix 2 contains a target but does not provide policies to ensure this is met. The Plan it must include policies setting out how this extra care/C2 need will be met and such policies should also seek to ensure that sufficient provision is directed to rural settlement – it will not be appropriate to simply provide extra care accommodation in urban areas, as this would displace members of rural community requiring this form of accommodation.
- It is noted that the recent Inspector's Report into the Luton Local Plan recommended deletion of a similar policy in the absence of justification for the proportion of wheelchair user housing to be required (the Luton Local Plan requiring the same provision as the draft Uttlesford Local Plan). It is recommended that modifications are made to policy H10 to make clear that the proportions are not policy requirements.
- Lack of clarity as to how policy will relate to the Garden Communities and where this will be set out. The development framework is considered the most appropriate document
- Policy recognises particular housing design requirements, but ignores any location requirements. The District is predominantly rural and it is considered that there should be an additional Rural Exception Policy which includes an allowance for developments on sites which are well related to but beyond any settlement in order to provide accommodation which is accessible and adaptable for older people. In this way self-contained specialist housing (class C3) schemes and some care (class C2) schemes could be developed in all types of settlement which will encourage local people to downsize. Allowing, appropriate developments as exceptions will help to strengthen communities and make a valuable addition to the District's housing stock.
- Consider that the best approach towards meeting the diverse housing needs of older people is by having clear and specific policies that encourage the delivery of specialist forms of accommodation such as sheltered/ retirement housing and Extra Care accommodation. This is an expectation of the NPPG and possibly the subject of further legislation through the White Paper. In the interim, we would suggest that the Policy is prefaced as follows:

- *"The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations. The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances and to actively encourage developers to build new homes to the 'Lifetime Homes' standard so that they can be readily adapted to meet the needs of those with disabilities and the elderly as well as assisting independent living at home. The Council will, through the identification of sites, allowing for windfall developments, and/ or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities."*

Individuals

- A link to the HAPPI website would be useful.
- Access to a small personal garden helps maintain independence, health and wellbeing in many elderly people and should be included in any development for this age group.
- Plan does not mention any care for old people in these homes. there does not seem to be A&E or care for the elderly.
- The policy should also control the location and relationship of such housing to facilities and open spaces with easy access to safe pedestrian/mobility scooter routes and taking into for example account steep hills, pavement widths, road traffic volumes on nearby roads.
- The presumption should be that sites in the heart of towns and near to shops should be set aside for the elderly and the infirm. A good example is Elm Grove (next to Waitrose) in Saffron Walden.
- The policy should omit the exclusion clauses in the last paragraph and the subject to viability in the second paragraph.
- All claims of 'financial unviability' should be tested by an independent advisor, in the employ of the Council (not proffered by the developer).
- There is a need for more bungalows
- It would be good to know where the Building Regulations Requirements can be found.
- Ensuring that houses can be adapted to meet the changing needs of occupants over time is good policy

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

The Policy will ensure positive outcomes for this type of accommodation need. Impacts are minor regarding housing delivery in reflection of meeting the needs of the specific demographic to which such accommodation relates. There will however be significant positive implications regarding social inclusion, through ensuring the delivery of accessible homes and bungalows that the market would otherwise not provide but for which there is an identified need.

Alternatives Considered

It is considered that any deviation from the Policy approach could be considered unsustainable in line with the demographic profile of the Plan Area or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures/Recommendations

No mitigation measures or recommendations are proposed at this stage.

Officer response

Proposed changes to plan