

## CHAPTER 8 - Infrastructure

### Introduction

#### Paragraph 8.1 - 8.5/Policy INF1

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

Support	0
Object	6
Comment	12

#### Overarching Summary

- The Environment Agency generally concurs with the issues raised on water infrastructure although notes impacts on rivers/need for detailed water cycle strategy to verify the assumptions in the stage one WCS. Without a detailed Water Cycle Study before submission plan unsound.
- National Trust require amended definition of Green Infrastructure/NPPF Annex 2 - network of multifunctional green space
- Landowner requested mention of Places of Worship in paragraph 8.1
- Individuals mention, concerned that facilities will become more overstretched e.g. education, health, roads, limited public transport
- Housing must be accompanied by facilities/but not happening with existing growth and new growth with be the same

#### Statutory consultees and other bodies

Regional Planning Advisor National Trust

This defines Green Infrastructure as Designed landscapes (including Country Parks) and natural/semi-natural green space. This definition should be amended in line with the definition set out in Annex 2 of the NPPF - network of multifunctional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. As indicated above, the National Trust considers that a Green Infrastructure Strategy is required.

Environment Agency

The Regulation 18 Local Plan and the Infrastructure Delivery Plan has highlighted several issues regarding water infrastructure in the proposed growth plan. The Environment Agency generally concurs with the issues raised with regard to water infrastructure, however we do feel it is important to reiterate certain points. Upgrades to water infrastructure will be necessary to accommodate the projected growth in the local plan. Provision of suitable infrastructure will be a major factor with regards to the achievable scale, distribution and timing of this plan. We consider it imperative that these issues are addressed before any of the plans can be fully implemented. In the Hertfordshire and North London area, Thames Water will need to be an active participant in the delivery of the proposed plans. Elsenham is connected to the Stansted Sewage Treatment Works (STWs). There is single pipe connection which passes underneath the M11. There is a need for the Council and developers to work closely with Thames Water to understand any constraints and/or upgrades required to accommodate the proposed residential allocations in the Elsenham area. Takeley has its own small STW which discharges into the upper reaches of the Pincey Brook. The dilution capacity of the receiving watercourse is low especially during dry periods of the year. Any changes to the present discharge arrangements will need to be carefully assessed. There will be a need for the Council to understand any constraints on additional demands placed on this treatment works. The Environment Agency will work closely with Thames Water to ensure high environmental standards continue to be met. The figures given in the Local Plan are in line with those used in recent previous documents (e.g. the updated water cycle study and the IDP). However, the water cycle study was only completed to stage 1 standard. The statements of where upgrades will take place and sewage will be received in Policies SP6, 7

and 8 pre-empt the very necessary stage 2 water cycle study. At this stage, we cannot be certain that the necessary upgrades are possible, or that an appropriate revised permit will be granted. Given that the rivers which flow through Uttlesford are only headwaters, the presence of enough dilution to support the proposed WRC extensions is not a given, and the permitted nutrient limits required could be extremely challenging to meet. Policy SP8 also pre-empts the water cycle study for the North Essex Garden Communities Integrated Water Management Strategy (IWMS) currently being completed by AECOM (also discussed further on this response). In this study, at stage 1 draft stage, the feasible options for the west of Braintree community also include building an entirely new WRC, with discharge split between the rivers Brain and Blackwater. We would recommend slightly changing the phrasing of these policies such that upgrading the WRCs mentioned is phrased as an option under investigation or the ~currently preferred option rather than as a certainty.

Water Quality/ Wastewater comments Paragraph 9.5 Conclusions For New Settlements on page 61 of the Water Cycle Study (WCS) Update, dated January 2017, suggests that an alternative foul drainage solution for a New Settlement at Great Chesterford could be conveyance to Saffron Walden catchment if viable. Although we provided updated datasets we were not consulted on the conclusions of the WCS Update. Little detail is provided regarding the assessments carried out in that WCS Update, but it is our opinion that conveyance of large volumes of foul sewage to Saffron Walden would not likely be a viable option. The environmental capacity is severely constrained in the local watercourse (The Slade) where there is limited dilution available for an increase in sewage discharge volumes. The WCS Update conclusion goes on to state that Consultation indicates that both Thames Water and Anglian Water have concerns regarding the level of growth and it is recommended they are engaged by the site promoters as early as possible. We note that paragraphs 3.1.9 and 3.1.10 of the Uttlesford IDP: Addendum and Summary Paper make the respective points: Para 3.1.9: Provision of water infrastructure is critical and could be a risk to the spatial distribution of growth in the local plan period. Growth at the proposed new garden communities will place additional burdens on foul water capacity. Para 3.1.10: The EA has advised that the level of discharges into water courses is currently at its limit and that additional permits for increased discharges may not be granted. We echo the concern expressed by the water companies, but suggest that further detailed WCS assessments should be carried out in order to properly assess the potential impact of the New Settlement(s) at all locations. The WCS should form part of an evidence base to demonstrate that the quantum of growth proposed in the Local Plan can be delivered sustainably and without causing a breach of environmental legislation. Encouraging site promoters to engage with the water companies is to be encouraged but this in itself will not prevent a breach of environmental legislation and is not a substitute for a full and proper WCS assessment ahead of the Local Plan being finalised/approved. As matters stand, we consider that in the absence of further detailed WCS assessments, including the outputs of the North Essex Garden Communities IWMS, the evidence base supporting the Uttlesford proposed new settlements does not, in our view, fully engage with National Policy and the National Planning Practice Guidance. We consider it is not consistent with the National Policy position and is therefore unsound.

#### Developers/landowners/site promoters

Regeneration Adviser Diocese of Chelmsford Paragraph 8.1 should mention places of worship to be compliant with section 70 of the NPPF

#### Individuals

Essential any required infrastructure improvements in place before any further development in UDC, e.g. Takeley, existing infrastructure is unable to cope now

No plan to support this aspiration in the case of North Uttlesford Garden Village

Previous expansions in Uttlesford resulted in little done to increase facilities e.g. primary schools bursting at the seams in Dunmow and Takeley, doctors surgeries almost full/Takeley doesn't have one

West of Braintree infrastructure cannot cope with the current levels of development in the area/poor roads schools siting portakabins/doctors waiting times increased due to woodlands park/flitch green but no public transport, additional secondary schools/doctors surgeries, A120 becomes gridlocked at peak times

Education not addressed in this plan? One or more new secondary schools is needed in the district. SWCHS cannot cope/Thaxted's children not getting in/education outside the district

Green infrastructure/need to preserve/add to off road network/green infrastructure/rights of way available to horse riders, cyclists and walkers/horse riders most vulnerable of all road users

UDC has mountain to meet local health care needs - wait 5 weeks for a family GP appointments and 4 weeks for a midwife appointment even in the holiday season

Annual rainfall is diminishing/Garden Communities and economic development will increase demand on a contracting water supply/ reduce rain water seeping through to the aquifer

Too passive/effective infrastructure needs lots of work - as in Cambridgeshire over the last 20 years.

## **Policy INF 1**

This policy and supporting text was responded to by 51 people/organisations.

Support	14
Object	9
Comment	28

### Overarching Summary

- The Environment Agency generally concurs with the issues raised with regard to water infrastructure although notes impacts on rivers/need for detailed water cycle strategy
- The Skills agency supports the policy/add reference to key education documents would assist it
- Sport England Welcome the policy in principle and its intention regards making provision although note that a robust evidence base needs to support it
- The national trust consider that a green infrastructure study is required
- Natural England pleased to see Green Infrastructure included/ need for a Green Infrastructure policy that applies generally to development
- Historic England note infrastructure should consider impacts on heritage assets and their setting, as well as archaeological potential
- Saffron Academy Trust support allocations enable the expansion of the primary school site so that Saffron Primary School can have two forms of entry
- West Essex Clinical Commissioning Group note existing GP practices in the area do not have capacity to accommodate significant growth although begun to address capacity issues
- Uttlesford Citizens Advice Bureau issues are access to services and cost of public transport
- Wendens Ambo Parish Council note that the provision of facilities are outside the control of UDC
- Clerk Elsenham Parish Council note substantial growth here on a piecemeal basis, with concerted and imaginative attempt to correct it
- Takeley Parish Council notes liaison with Braintree District Council and East Herts District Council and others remain a priority/cumulative impact adequately assessed/health care provision in the accident & emergency site needed
- Rayne Parish Council notes this section of the plan most critical in terms of what it could do to ease opposition to the West of Braintree site
- Thaxted society support policy but "Delivery in a timely manner" needs clarification i.e. loophole
- Great Chesterford Parish Council note timely delivery of infrastructure cannot be achieved until infrastructure requirements properly assessed/costed with potentially crippling costs

- Essex County Council supports inclusion of policy setting out broad requirements for delivery of infrastructure to support development/but ensure aligns with ECC model policy for Infrastructure Delivery and Impact Mitigation.
- Developers of preferred GCs support policies
- Individuals concern facilities will become more overstretched e.g. education, health, roads/lack of targets/thresholds/enforcement, no evidence to support delivery of GCs, smaller scale development makes no contribution

### Statutory consultees and other bodies

#### Great Chesterford Parish Council

Timely delivery of infrastructure cannot be achieved unless and until the infrastructure requirements have been properly assessed and costed. NUGC will create a huge infrastructure cost, and require infrastructure the likes of which we haven't seen in north Uttlesford for over a hundred years. No studies have adequately assessed the impact on Saffron Walden, Great Chesterford, the A11/M11, the railway or the villages and roads of South Cambridgeshire. Deciding on NUGC before this work is carried out is absurd given the potential cost could very easily cripple any development. Securing the site for no more than 1.5 times agricultural land value in accordance with Garden City principles is the only way there is even a fighting chance of this happening. A S106 package would be far too large if commercial land value is paid for the site by a developer, so corners will be cut, and infrastructure back-filled once the inevitable problems are encountered. In the case of most of the issues identified, solutions are not likely to be able to be delivered for a whole host of reasons including lack of national funding, no local support, no network rail support, land ownership issues, County Council funding and the need to develop housing much faster than the pace of infrastructure delivery which is always very slow and hugely costly. Most if not all of the key infrastructure players have not even been consulted on NUGC let alone given any kind of assurances that the necessary infrastructure (once identified and costed) will be delivered. No timescale is even remotely possible as a result.

#### Essex County Council

ECC supports the inclusion of Policy INF1 which sets out the broad requirements for the delivery of infrastructure to support development. However, it is recommended that UDC reviews this policy to ensure it aligns with the ECC model policy for Infrastructure Delivery and Impact Mitigation. This will ensure the full range of infrastructure is considered and that planning permission will only be granted if it can be demonstrated that there is sufficient appropriate infrastructure capacity to support the development or that such capacity will be delivered by the proposal. Such an approach would align with the policies included in the North Essex authorities Local Plans and would provide a consistent approach given the cross boundary Garden Community allocation at West of Braintree. An amended policy should cover the following: Specify when developers are required to either make direct provision or to contribute towards development for the provision of local and strategic infrastructure required by the development (including land for new schools); Requirements for all new development to be supported by, and have good access to all necessary infrastructure; Requirement to demonstrate that there is or will be sufficient infrastructure capacity to support and meet all the necessary requirements arising from the proposed impacts of a scheme (i.e. not just those on the site or its immediate vicinity) and regardless of whether the proposal is a Local Plan allocation or a windfall site; When conditions or planning obligations will be appropriate - as part of a package or combination of infrastructure delivery measures or likely to be required to ensure new developments meets this principle; and Consideration of likely timing of infrastructure provision phased spatially or to ensure provision of infrastructure in a timely manner. The recommended wording for an amended Infrastructure delivery and impact mitigation policy is provided below: Policy X: Infrastructure delivery and impact mitigation. Permission will only be granted if it can be demonstrated that there is sufficient appropriate infrastructure capacity to support the development or that such capacity will be delivered by the proposal. It must further be demonstrated that such capacity as is required will prove sustainable over time both in physical and financial terms. Where a development proposal requires

additional infrastructure capacity, to be deemed acceptable, mitigation measures must be agreed with the Council and the appropriate infrastructure provider. Such measures may include (but not exclusively) financial contributions towards new or expanded facilities and the maintenance therefore on-site construction of new provision; off-site capacity improvement works; and/or the provision of land. Developers and land owners must work positively with the Council, neighbouring authorities and other infrastructure providers throughout the planning process to ensure that the cumulative impact of development is considered and then mitigated, at the appropriate time, in line with their published policies and guidance. The Council may consider introducing a Community Infrastructure Levy (CIL) and would implement such for areas and/or development types where a viable charging schedule would best mitigate the impacts of growth. Section 106 will remain the appropriate mechanism for securing land and works along with financial contributions where a sum for the necessary infrastructure is not secured via CIL. For the purposes of this policy the widest reasonable definition of infrastructure and infrastructure providers will be applied. Exemplar types of infrastructure are provided in the glossary appended to this Plan. Exceptions to this policy will only be considered whereby: it is proven that the benefit of the development proceeding without full mitigation outweighs the collective harm; a fully transparent open book viability assessment has proven that full mitigation cannot be afforded, allowing only for the minimum level of developer profit and land owner receipt necessary for the development to proceed; full and thorough investigation has been undertaken to find innovative solutions to issues and all possible steps have been taken to minimise the residual level of unmitigated impacts; and obligations are entered into by the developer that provide for review at appropriate interval(s) and appropriate additional mitigation in the event that viability improves prior to completion of the development. To support the above policy and other Local Plan policies, it is recommended that the following term is included in the Glossary Infrastructure means any structure, building, system facility and/or provision required by an area for its social and/or economic function and/or well-being including (but not exclusively): a. affordable housing b. broadband c. community and social facilities d. cultural facilities, including public art e. drainage and flood protection f. education and childcare g. emergency services h. facilities for specific sections of the community such as youth or the elderly i. footways, cycleways and highways j. green infrastructure k. healthcare l. live/work units and lifetime homes m. open space n. public transport o. sports, leisure and recreation facilities p. waste recycling facilities. ECC also recommends the inclusion of the following text as part of the policy preamble. The addition is required to ensure developers consider the ECC Developers Guide to Infrastructure Contributions, where infrastructure provision is a responsibility of the county council and not UDC. Examples are schools and early years and childcare provision, highways and transport, and flood and water management and sustainable drainage systems. In considering the potential requirements from development on ECC services and infrastructure reference should be made to the ECC Developers Guide to Infrastructure Contributions (2016) or amended versions. Early Years and Child Care Â ECC is mindful that families do not always access Early Years and Child Care facilities close to where they live. For some families it makes sense to access childcare closer to where they may work or in close proximity to railway stations. Furthermore families with under-5 year old children may move house to larger properties close to where they want to send their child to school. Providers of childcare are independent businesses and dependent upon the market and the sustainability of their own business. This can mean that providers of childcare can open or close at short notice. ECC recommends that given there are changing circumstances for the provision of Early Years and Child Care facilities; any increase in numbers of dwellings will need further analysis of the current childcare. This will allow ECC to determine whether there is a need for possible increased numbers of childcare places. Where there may be large numbers of vacancies it would be detrimental to open new provision. Using Policy SP3 entitled The Scale and Distribution of Housing Development, ECC has highlighted the required increase in child care needed to ensure there are adequate facilities for the future population within UDC. Appendix 3 (attached) also highlights more detailed evidence including current childcare provision for each location and provides a narrative regarding the type of facility that may be developed. Table 1 outlines the required increase in childcare arising from Local Plan growth. Ward/Village/Settlement Required Increase in Childcare New Garden Communities Easton Park Community Wards include Thaxted and the Eastons 162 childcare places North Uttlesford - Two nearest wards include Wendon Lofts, Great Chesterford, Newport Littlebury 171 childcare places West of Braintree 87 childcare places Market Towns Saffron Walden - Three wards within Saffron Walden,

Saffron Walden Shire, Saffron Walden Audley 21 childcare places Great Dunmow - Wards include Great Dunmow South and Barnston 66 childcare places

#### Takeley Parish Council

Liaison with Braintree District Council and East Herts District Council and other local authorities must remain a priority as it is clear the cumulative impact from other areas not in the same District need to be adequately assessed. In particular health care provision in the form of an Accident & Emergency facility. site must be identified and monies pooled from smaller developments for healthcare as a matter of urgency for hospital Where large scale developments are planned the District must make sure there is clause that land is preserved for Hospital space houses should not be built on that land instead, as this will impact everyones amenity. Other areas previously considered suitable for warehousing must not be overlooked especially where access and other ancillary facilities could complement a hospital building instead

#### Saffron Academy Trust

Saffron Academy Trust was successful in its bid to operate the new Saffron Primary School, which will be developed by Essex County Council. A site for the new school has been provided through the Section 106 Planning Agreement covering the development now being progressed by Linden Homes at Radwinter Road in Saffron Walden (planning reference UTT/13/3467/OP). Although the medium term local need is for a two-form entry primary school, the current site provides only for one form of entry. However, we note that further land could be made available to expand the current site to accommodate a second form of entry. We would strongly support policies that secure appropriate further land to expand the site and would ask that in finalising housing allocations in Saffron Walden, the Local Plan prioritises allocations that enable the expansion of the primary school site so that Saffron Primary School can accommodate two forms of entry.

#### Historic England

All proposed infrastructure schemes should take into consideration theirs impacts on heritage assets and their setting, as well as archaeological potential.

#### Planning Little Chesterford Parish Council

Policy INF1- Infrastructure delivery & TA1- Accessible development. The development of the NUGV as currently proposed does not meet these policies. The policies state: Development must take account of the needs of new and existing populations. It must be supported by the timely delivery of infrastructure, services and facilities necessary to meet the needs arising from development. This is particularly important for the new garden communities. The capacity of the access to the main road network and the capacity of the road network itself must be capable of accommodating the development safely and without causing congestion, However, the available plans for NUGV do not support this, for example: No firm transport or access plans the only access to the site is via B184. To access the nearest services in the attractive historic market town of Saffron Walden, traffic will be funnelled down the narrow Bridge Street, affecting Air Quality Management Zones and adding to existing congestion. The only planned improvement is that to the A505/A1301 roundabout, which is already at capacity at peak periods and beyond. Plans for this improvement have not been agreed with South Cambridgeshire, where it is located, and the costs provided in the evidence are up to £10 million less than those estimated by South Cambridgeshire. Dualling of the A505 to remediate some of these problems is not planned until 2033 at the earliest. The traffic assessment in plan does not appear to be consistent with experience of congestion at this junction and does not take proper account of predicted growth from in neighbouring areas such as South Cambridgeshire, North Herts and West Suffolk. We suggest that a more comprehensive and up to date study is made. The railway station at Great Chesterford does not have potential to increase parking and peak services are at capacity

#### Rayne Parish Council

This section of the overall plan is the most critical in terms of what it could do to ease opposition to the West of Braintree site. At present the commitment in this version of the plan falls short in several ways. A

prime example is in Policy INF1 which states: Policy INF1 - Infrastructure Delivery Development must take account of the needs of new and existing populations. It must be supported by the timely delivery of infrastructure, services and facilities necessary to meet the needs arising from the development. This is particularly important for the new garden communities. Each development must address physical, community, social and green infrastructure. In assessing capacity, developers will provide evidence as to whether existing infrastructure can be used more efficiently, or whether the impact of development can be reduced through promoting behavioural change. New development will only be permitted if the necessary on and off-site infrastructure that is required to support it, and mitigate its impact, is either already in place, or there is a reliable mechanism in place to ensure that it will be delivered in a timely manner. A combination of funding sources will be sought to deliver the infrastructure required to deliver the spatial strategy. Developers will either make direct provision or contribute towards the provision of infrastructure required by the development either alone or cumulatively with other developments. Planning obligations and phasing conditions will be required where necessary to ensure that development meets the principles of this policy. This is not definitive enough in its terminology and the commitment regarding the timing of the delivery of the Infrastructure will contribute in resolving the issues of unsoundness. The revisions below are recommended: Policy INF1 - Infrastructure Delivery Development must take account of the needs of both the new and existing populations. It must be supported by the early delivery of infrastructure, services and facilities necessary to meet the needs arising from the development and before the development starts. This is particularly important for the new garden communities and for the existing residents living close to, or impacted by, the Garden Community . Each development must address physical, community, social, blue and green infrastructure. In assessing capacity, developers will provide evidence and demonstrate its effectiveness and suitability , as to whether existing infrastructure can be used more efficiently, or whether the impact of development can be reduced through promoting behavioural change (details of the timelines associated with such behavioural change can be demonstrated and accepted as a reasonable approach). New development will only be permitted if the necessary on and off-site infrastructure that is required to support it, and mitigate its impact, is already in place. A combination of funding sources will be sought to deliver the infrastructure required to deliver the spatial strategy. Developers will either make direct provision or contribute towards the provision of infrastructure required by the development either alone or cumulatively with other developments. These provisions/contributions have to covered by formal legal agreements that avoid issues where developers hold local authorities to ransom when altering, for example, social housing Planning obligations and phasing conditions will be required and imposed where necessary to ensure that development meets the principles of this very important policy policy. It is recognised and accepted that the provision of infrastructure up-front is expensive in terms of cash-flow but not as high as the cost of the Local Plan failing completely. A key aspect of the Transport proposals is a determination to increase the amount of cycling and walking that residents undertake. This is laudable but unrealistic, especiaill in the short term. Comment is made about the Flitch Way and it would be good to be in a position to totally support this initiative. However a situation already exists at Fentons Road bridge in Rayne, where the condition of the bridge has meant the closure of the Flitch Way. This is an ECC responsibility and the closure is down to insufficient/poor quality maintenance. This leads to a conclusion that Fentons Road bridge is not a one-off. Many lessons on how not to protect the Flitch Way are evident in Great Dunmow and Canfield and lessons have to be learnt. It is a prime example of a lack of longer-term planning and the outcome of panic measures in producing the current Local Plan The viability of the Eastern Link Road□ could have a major adverse impact on the whole of the WoB community and has to be clarified at the earliest opportunity.

#### Chrishall Parish Council

Infrastructure: Chrishall Parish Council would express grave reservations about the lack of infrastructure planning for the proposed developments. Any future development must have infrastructure planned and built prior to the building of any dwelling. Roads, shops, services including doctors, schools, dentists etc must be planned and in situ before houses have been built and inhabited. This must be a priority and must be made a condition of any planning permission.

## West Essex Clinical Commissioning Group

In developing the final Local Plan document, care should be taken to ensure that emerging policies will not have an adverse impact on healthcare provision within the plan area and over the plan period. In instances where major policies involve the provision of development in locations where healthcare service capacity is insufficient to meet the augmented needs appropriate mitigation will be sought. Policies should be explicit in that contributions towards healthcare provision will be obtained and the Local Planning Authority will consider developments sustainability with regard to effective healthcare provision. The exact nature and scale of the contribution and the subsequent expenditure by West Essex CCG and NHS England will be calculated at an appropriate time as and when schemes come forward over the plan period to realise the objectives of the draft local plan. Plans and policies should be revised to ensure that they are specific enough in their aims, but are not in any way prescriptive or binding on West Essex or NHS England to carry out certain development within a set timeframe and do not give undue commitment to projects. With regard to the current primary healthcare provision in Uttlesford there are 10 GP practices, 4 branch surgeries and 1 community hospital in Saffron Walden. These are the healthcare services available that this district council local plan must take into account in formulating future strategies. Growth in terms of housing and employment, is proposed across a wide area and would likely have an impact on future healthcare service provision. Existing GP practices in the area do not have capacity to accommodate significant growth. In terms of optimal space requirements to encourage a full range of primary care services to be delivered with the community there is an overall capacity deficit, based on weighted patient list sizes, within the 10 GP practices providing services in the area. West Essex CCG have begun to address capacity issues in the area and there are a number of proposals in the pipeline: Great Dunmow is being considered for options to integrate a hub type facility. A new facility has recently opened in Stansted Mountfitchet with some room for growth but the Elsenham growth and capacity needs to be understood. A feasibility study has been completed for Saffron Walden, highlighting options for the GP practices and the potential use of the Community Hospital site. Thaxted surgery is being developed to increase capacity with a double floor extension planned. Hatfield Heath capacity requires consideration with regard to any local development. Optimal space standards for primary care are set for planning purposes only. This allows us to review the space we have available and identify the impact development growth will have in terms of capacity and service delivery. Space capacity deficit does not prevent a practice from increasing its list size, however it may impact on the level and type of services the practice is able to deliver. West Essex CCG and NHS England are currently working together to help plan and develop new ways of working with our primary care facilities, in line with the Five Year Forward View, to increase capacity in ways other than increasing physical space. Existing health infrastructure will require further investment and improvement in order to meet the needs of the planned growth shown in this local plan. The developments contained within would have an impact on healthcare provision in the area and its implications, if unmitigated, would be unsustainable.

## Manchester Airports Groups (MAG)

Supported and welcomed reference to: combination of funding sources will be sought to deliver the infrastructure required to deliver the spatial strategy. Developers will either make direct provision or contribute towards the provision of infrastructure required by the development either alone or cumulatively with other developments. However, the delivery of the necessary improvements in the long term to the Strategic Road Network will be contingent on the ability to do this. Further progress must be made on either CIL or a sound mechanism and strategy to utilise S106 contributions (which carry limits on numbers to pool contributions). The plan risks being un-sound without such progress.

## Sustainable Uttlesford

The development of a parallel Infrastructure Implementation Plan to provide for current deficits and future needs in the provision, including sites, of community infrastructure eg education, health, sporting, green and age specific uses eg youth and elderly spaces/services.

## Town Clerk Saffron Walden Town Council

Define timely delivery. This should say at defined, pre-agreed trigger points. Should include reference to community shopping facilities. Broadly support this policy Action: Support but request change re defining the time to have specific trigger points

## The Thaxted Society

INF1 Support. 'Delivery in a timely manner' needs clarification. The phrase is a loophole through which many a benefit or mitigation has been lost. Enforcement and intention should be declared. South East Education and Skills Funding Agency.

Supports policy. In light of the requirement for all Local Plans to be consistent with national policy, you will have no doubt taken account of key national policies relating to the provision of new school places, but it would be helpful if they were explicitly referenced or signposted within the document. In particular: - The National Planning Policy Framework (NPPF) advises that local planning authorities (LPAs) should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education (para 72). - The ESFA supports the principle of Uttlesford District safeguarding land for the provision of new schools to meet government planning policy objectives as set out in paragraph 72 of the NPPF. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary. - Uttlesford District should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on Planning for Schools Development [1] (2011) which sets out the Government's commitment to support the development of state-funded schools and their delivery through the planning system. [1]

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6316/1966097.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6316/1966097.pdf) The ESFA commends, for example, the approach taken by the London Borough of Ealing in producing a Planning for Schools Development Plan Document (DPD). The DPD provides policy direction and establishes the Councils approach to providing primary and secondary school places and helps to identify sites which may be suitable for providing them ), whether by extension to existing schools or on new sites. The DPD includes site allocations as well as policies to safeguard the sites and assist implementation and was adopted in May 2016 as part of the Local Plan. The DPD may provide useful guidance with respect to an evidence based approach to planning for new schools in the emerging Uttlesford Local Plan, securing site allocations for schools as well as providing example policies to aid delivery through Development Management policies. Ensuring there is an adequate supply of sites for schools is essential and will ensure that Uttlesford District can swiftly and flexibly respond to the existing and future need for school places to meet the needs of the area over the plan period. The ESFA note that Essex County Council has produced a Developers Guide to Infrastructure Contributions (revised 2016) that includes an explanation of contributions towards expanding existing schools and creating new schools. It would be helpful and relevant for this document to be referenced within the Local Plan in the section alongside policy INF1 which covers developer contributions.

## Sport England

The policy is welcomed in principle as it intends to ensure that new development makes appropriate infrastructure provision including community sports facilities. The policy proposes to use the Councils evidence base including the Playing Pitch Strategy for identifying infrastructure needs. While using the evidence base to inform needs is the appropriate approach in principle which would accord with paragraph 73 of the NPPF in relation to sports facilities, regard should be had to separate comments made on policy INF2 about the robustness of the Councils evidence base for sport. It is considered necessary for these comments to be addressed to ensure that policy INF1 can be implemented as a robust evidence base is required for informing and justifying sports facility needs.

## Regional Planning Advisor National Trust

This defines Green Infrastructure as Designed landscapes (including Country Parks) and natural/semi-natural green space. This definition should be amended in line with the definition set out in Annex 2 of the NPPF - network of multifunctional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. As indicated above, the National Trust considers that a Green Infrastructure Strategy is required.

## Environment Agency

The Regulation 18 Local Plan and the Infrastructure Delivery Plan has highlighted several issues regarding water infrastructure in the proposed growth plan. The Environment Agency generally concurs with the issues raised with regard to water infrastructure, however we do feel it is important to reiterate certain points. Upgrades to water infrastructure will be necessary to accommodate the projected growth in the local plan. Provision of suitable infrastructure will be a major factor with regards to the achievable scale, distribution and timing of this plan. We consider it imperative that these issues are addressed before any of the plans can be fully implemented. In the Hertfordshire and North London area, Thames Water will need to be an active participant in the delivery of the proposed plans. Elensham is connected to the Stansted Sewage Treatment Works (STWs). There is single pipe connection which passes underneath the M11. There is a need for the Council and developers to work closely with Thames Water to understand any constraints and/or upgrades required to accommodate the proposed residential allocations in the Elsenham area. Takeley has its own small STW which discharges into the upper reaches of the Pincey Brook. The dilution capacity of the receiving watercourse is low especially during dry periods of the year. Any changes to the present discharge arrangements will need to be carefully assessed. There will be a need for the Council to understand any constraints on additional demands placed on this treatment works. The Environment Agency will work closely with Thames Water to ensure high environmental standards continue to be met. The figures given in the Local Plan are in line with those used in recent previous documents (e.g. the updated water cycle study and the IDP). However, the water cycle study was only completed to stage 1 standard. The statements of where upgrades will take place and sewage will be received in Policies SP6, 7 and 8 pre-empt the very necessary stage 2 water cycle study. At this stage, we cannot be certain that the necessary upgrades are possible, or that an appropriate revised permit will be granted. Given that the rivers which flow through Uttlesford are only headwaters, the presence of enough dilution to support the proposed WRC extensions is not a given, and the permitted nutrient limits required could be extremely challenging to meet. Policy SP8 also pre-empts the water cycle study for the North Essex Garden Communities Integrated Water Management Strategy (IWMS) currently being completed by AECOM (also discussed further on this response). In this study, at stage 1 draft stage, the feasible options for the west of Braintree community also include building an entirely new WRC, with discharge split between the rivers Brain and Blackwater. We would recommend slightly changing the phrasing of these policies such that upgrading the WRCs mentioned is phrased as an option under investigation or the ~currently preferred option rather than as a certainty.

## Thames Water

Thames Water support the content of Policy INF1 which highlights that new development will only be permitted if the necessary on and off-site infrastructure that is required to support it and mitigate its impact is either already in place or there is a reliable mechanism in place to ensure that it will be delivered in a timely manner. In relation to wastewater infrastructure delivery such a policy is required to ensure that there is adequate capacity both on and off the site to serve the development and that it would not lead to adverse amenity impacts for existing or future users in the form of internal and external sewer flooding or pollution of land and water courses. In some circumstances this may make it necessary for developers to carry out appropriate appraisals and reports to ascertain whether the proposed development will lead to overloading of existing water and/or waste water infrastructure. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. Thames Water has limited powers under the Water

Industry Act 1991 to prevent connection to its network ahead of infrastructure upgrades. As such Thames Water relies heavily on the planning system to ensure infrastructure upgrades are provided ahead of development. Planning mechanisms to ensure the timely delivery of any upgrades alongside development may include the use of conditions to phase development or Grampian Style conditions to ensure necessary upgrades to the wastewater network are delivered in advance of the occupation of development. Pre-application discussions. In order to ensure that drainage requirements of development proposals are understood and that any upgrade requirements are identified, all developers should be encouraged to contact Thames Water Developer Services in advance of the submission of planning applications. Thames Water recommend that developers engage with them at the earliest opportunity to establish the following: The developments demand for wastewater infrastructure both on and off site and can it be met; and The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

#### Uttlesford Citizens Advice Bureau

We are also aware that physical access to services and the cost and provision of public transport are consistent issues within our client base. Therefore the delivery of infrastructure ahead of new housing completions will be crucial. Particularly: Low cost transport options including pathways for walking and cycling Regular, subsidised or free bus transport options Affordable and accessible parking Access to advice services, district council services, employment support, mental health services and community support Facilities such as schools, GP surgeries, shops and cashpoints within a reasonable travel distance Community facilities to prevent isolation and encourage community cohesion, such as sports centres, day centres, outdoor community space and youth services We would be pleased to provide further statistics relating to our work in the district should these be useful.

#### Wendens Ambo Parish Council

WAPC believes UDC will have little or no control over this as roads, rail services, doctors surgeries, broadband etc are dependent on external parties. Currently there is little evidence to date of priority being given to Uttlesford District by Essex County Council in respect of basic services such as road repairs. How will UDC prevent houses being built before roads, broadband etc are confirmed and timetabled to be put in place in time? Uttlesford is already lagging behind and there are no guarantees for any of these essential services.

#### Elsenham Parish Council

Development in Elsenham has been permitted on a piecemeal but substantial basis, with no regard for the cumulative effect on, for example, road access or recreational provision or pressure on the surgery. There is a need for a concerted and imaginative attempt to correct the inadequacies, in addition to ensuring that better practice is adopted in future.

#### Neighbourhood Plan Coordinator Saffron Walden Neighbourhood Plan Steering Group

Why leave it all to developers? There is a danger that they offer but don't deliver. Major infrastructure (i.e. roads) should be highways and not expected to be funded by developers unless absolutely necessary but sports facilities, green spaces, parks, community halls etc should be funded by Section 106 and land provided for schools. More community centres are needed in the district and more community open spaces that can be used for theatre, music and other community activities. In reality, UDC needs to develop a sports strategy (not just an audit of facilities). A separate policy is needed on future provision and improvement of sports facilities. Suggestion: definition is needed for timely delivery. This should ordinarily be set at 30% of the development being completed. All trigger points should be clearly defined and monitored. All facilities should be designed to Sport England standards.

#### Coordinator Stansted Neighbourhood Plan Steering Group

Why leave it all to developers? There is a danger that they offer but don't deliver. Major infrastructure (i.e. roads) should be highways and not expected to be funded by developers unless absolutely necessary but sports facilities, green spaces, parks, community halls etc should be funded by Section 106 and land provided for schools. More community centres are needed in the district and more community open spaces that can be used for theatre, music and other community activities. In reality, UDC needs to develop a sports strategy (not just an audit of facilities). A separate policy is needed on future provision and improvement of sports facilities Suggestion: definition is needed for timely delivery. This should ordinarily be set at 30% of the development being completed. All trigger points should be clearly defined and monitored. Major road infrastructure should be scheduled to be delivered early in the development. All facilities should be designed to Sport England standards UDC needs to make more commitment to improve green spaces, recreational and sporting facility provision

#### Natural England

Natural England is pleased to see Green Infrastructure (GI) included on the list of infrastructure requirements. We feel, however, that there is a need for a GI policy that applies generally to development to be included within the document.

#### Developers/landowners/site promoters

Development must be dependent upon the delivery of infrastructure, including transport improvements

Grosvenor recognise timely delivery of infrastructure, services and facilities to meet the needs arising from the NUGC supporting the content of Policy INF1 and paragraphs 8.3-8.5/ new facilities will have benefits beyond the new settlement to the wider area encouraging behavioural change

NUGC to include range of infrastructure both on-site and off-site including a network of new walking and cycling paths, new roads and road improvements, education including pre-school, primary and secondary provision, open spaces/sports pitches/facilities, and health facilities

The scale of NUGC will allow the proposed new community to be largely self-sustaining with regards to key services including education, health, community facilities and retail.

These facilities will themselves generate jobs in addition to any employment uses that come forward with the new community/location of the new settlement close to a number of major employment sites provides opportunities to provide sustainable transport options for the benefit of new residents.

Not bound by existing drainage infrastructure on site offering the opportunity to reduce the level of flood risk both within the development area and to downstream communities taking account of matters of water quality and biodiversity through the implementation of Sustainable Drainage Systems (SuDS).

Whilst reviewing on and off site flood risk, existing assets such as culverts and embankments can be assessed to identify opportunities to mitigate flood risk and where possible provide betterment.

#### Individuals

Unlikely any developer will be able to deliver or demonstrate that they can deliver the infrastructure required such as public transport, roads/require national/county scale planning and funding

No infrastructure in place to cope with the influx of extra householders and their families in the areas proposed: medical, roads, rail, bus, waste and sewerage disposal

Very reasonable in terms of expecting developers to show how existing infrastructure has to be adequate, or have mechanisms in place to provide it - but a specific timeframe needed/ financial burden clearer, together penalties if terms of planning are breached.

Behavioural change only suitable if guarantees from the developers that it will occur within a stipulated time, and there are contractually binding remedies should that change not be achieved

Tudor Park allowed to get away with bare minimum/not even required to provide adequate pedestrian access to the Saffron Walden on the south side of Ashdon Road

No evidence to support delivery of NUGC

Current development in Saffron Walden not matched by improvements in infrastructure - schooling, road transport, air quality, town centre congestion, medical facilities are all being impoverished

Need metrics for education and health/timely too vague/need trigger

Smaller scale developments will continue to get away with nil or negligible contribution

Saffron Walden needs a ring road around centre to relieve congestion/pollution improve the health and wellbeing of residents, People need will not cycle or walk around Saffron Walden/NUGV if not safe.

Imperative have access to rail/bus links including access by foot and cycle at growth inception for jobs schools, doctors, retail ect.

### Sustainability Appraisal June 2017

#### Significant, Temporal and Secondary Effects

The Policy will have significant positive impacts on ensuring infrastructure delivery to support new development. The Policy is not implicit as to the specific infrastructure requirements that could be required of new development due to its strategic nature, however additional objectives that could be expected to positively affected include biodiversity (through green and blue infrastructure), water resources, minimising flood risk, sustainable travel and access, health and education and skills.

#### Alternatives Considered

Due to the high level approach of the policy in ensuring sustainable development (and where possible self-sustainability in regard to Garden Communities), no other approaches or alternatives could be considered reasonable.

#### Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

#### Officer response

#### Proposed changes to plan

### **Paragraph 8.6 - 8.13/Policy INF2**

This supporting text was responded to by 22 people/organisations.

Support	2
Object	5
Comment	15

#### Overarching Summary

- Essex County Council consider need up to date/robust sports pitch evidence and strategy

- Saffron Walden/Stansted Mountfitchet Neighbourhood Plan Steering Groups consider already deficiency in public green space, sports facilities, allotments and require Angst standards are met, most settlements within 400 metres of a green space but not all, use Fields in Trust guidelines
- Saffron Walden Town Council cannot suggest that there is sufficient provision in Saffron Walden
- Thaxted Parish Council provision noting only 3 public gardens in Uttlesford
- Essex and Cambridgeshire British Horse Society mention of the rights of way network as an essential part of the links between green spaces.
- Elsenham YFC ask include references on location of additional playing space that will be created

### Statutory consultees and other bodies

#### Essex County Council

Robust assessments of need for pitches and built sports facilities provide a clear understanding of what is required in an area, provide a sound basis on which to develop policy, determine planning applications and make informed decisions for sports development and investment in sports facilities. It has been identified by ECC and partners, with an interest in sports and recreational facilities, that the UDC evidence base for its Local Plan within this subject area is not sufficiently up-to-date and robust in other respects. This could leave the Local Plan open to challenge accordingly. In summary, from a Local Plan perspective the Councils policies relating to the protection of existing facilities and securing new provision through the significant amount of new development that is planned will not be considered robust and may be challenged by developers in the absence of a robust evidence base. Furthermore, there is a risk that new development will not provide the facilities that are responsive to the community's needs as the evidence base may not be sound. Sport England would usually seek to support local authorities when applying its policies in relation to protecting, enhancing and providing facilities but in the absence of a robust evidence base it may be difficult for them to support UDCs position. ECC is promoting a range of actions and activities, such as through Active Essex, and is concerned with promoting higher levels of activity and sports participation throughout the county for the benefit of its residents. This also reflects ECCs Public Health role and helps to promote its public health interests. To rectify this, in the interests of ensuring a sound Local Plan, ECC and Sport England would recommend that UDC works with these parties (and others if necessary) to develop a robust and reliable evidence base to support and inform these areas of the Local Plan and its IDP.

#### Elsenham YFC

Elsenham YFC would ask that the local plan be altered to include references to the specific location of additional playing space that will be created in the district.

#### Neighbourhood Plan Coordinator Saffron Walden Neighbourhood Plan Steering Group

Sports Facilities: Note that there is already an identified deficiency in public open green space, sports facilities and allotments  
 Suggestion: The Local Plan needs to address the existing deficiency by ensuring that Fields in Trust and ANGsT standards are followed and take note of Sport England advice in this area.

Para 8.7 Most settlements within 400 metres of a green space  
 Comment: But not all are! There are a lot of developments without

Para 8.10 Delete this paragraph because it is confusing and conflicts with 8.6 and 8.8. Also, the district is so short of sports pitches that it cannot allow existing ones to go for housing development.  
 Suggestion: More playing pitches are needed than UDC is proposing. Fields in Trust guidelines must represent the minimum level provided for all new development.

Para 8.13 "in consultation with the local community" Not clear. Suggestion: Needs to say and Local Parish or Town Council as local community is not specific  
 Neighbourhood Plan Coordinator Stansted Mountfitchet

## Neighbourhood Plan Coordinator Stansted Mountfitchet

Note that there is already an identified deficiency in public open green space, sports facilities and allotments Suggestion: The Local Plan needs to address the existing deficiency by ensuring that Fields in Trust and ANGSt standards are followed and take note of Sport England advice in this area.

Para 8.7 Most settlements within 400 metres of a green space Comment: But not all are! There are a lot without. Comment Access to footpaths does not count.

Para 8.10 as above

Para 8.13 as above

## Saffron Walden Town Council

This is factually incorrect. It is just worthy of note, but this also should not suggest that there is sufficient in Saffron Walden. Proposed Action: Sentence to be amended - look at the number of public parks and spaces in other Towns & Villages around the Uttlesford area. By only showing those in SW it also gives the impression that there is sufficient in town already and this is not the case.

Define "As good as", This is subjective. They must be to the standard acceptable by the current owner. What about where new provision, land is owned by a different person? Comment: Amend

## Thaxted Parish Council

Is this factually correct. Only 3 public gardens in Uttlesford? Proposed Action: Query this

Para 8.12 Should define 'Local community' also as town/parish council and Neighbourhood Plan team. Comment: Amend

## Essex and Cambridgeshire British Horse Society

Paragraph 8.12: There is no mention of the rights of way network which is an essential part of the links between green spaces.

### Developers/landowners/site promoters

None

### Individuals

Cannot find documentation

## **Policy INF 2**

This policy and supporting text was responded to by 24 people/organisations.

Support	4
Object	13
Comment	7

### Overarching Summary

- Sport England require provision of natural and semi natural green space
- The National Trust considers that ideally a specific Green Infrastructure Strategy is required/standards needed in the policy on semi natural/natural green space

- Essex County Council recommends clarification is required to ensure does not apply to schools/surplus school fund better education facilities/need for school to expand including on playfields
- East Herts Council consider policy is unclear what the standards for sports provision/facilities
- Saffron Walden Town Council note protection of allotment land/cannot simply dispose of allotment land/improve standards
- Saffron Walden/Stansted Mountfitchet Neighbourhood Plans note standards not enough/gardens becoming smaller
- Wendens Ambo Parish Council note provision of facilities outside the control of UDC/ no guarantees
- Takeley Parish Council notes concerned square footage per person for amenity space is too low/easier for parish to get play facilities via grant than land
- Thaxted society support policy note Future obligations must be tied to enforcement mechanisms
- Thaxted Parish Council note allotments are protected/with duty to protect/amend policy
- Littlebury Parish Council note provision is far below other LPAs
- Dunmow and District Chamber of Trade and Commerce consider better car parking needed
- Individuals concerned standards too low/lacking teeth, over use of management companies/held to ransom/enforcement of standards poor
- Developers consider most open space standards too onerous/ease thresholds

#### Statutory consultees and other bodies

##### National Trust

Policy INF2 - Protection and Provision of Open Space, Sports Facilities and Playing Pitches Para.114 of the National Planning Policy Framework (NPPF) states that LPAs should set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of biodiversity and green infrastructure. The National Trust considers that a specific Green Infrastructure Strategy is required. Although reference is made to green infrastructure in several policies, a proper holistic strategy that refers to population growth against areas of green infrastructure is required so that the LPA and developers know what is required at each development to mitigate impact on the Hatfield Forest and other areas of public open space. A strategy is required so that there is clarity regarding the availability of green open recreation resource in relation to population and to ensure that new development will benefit biodiversity and considers accessibility to green spaces and the protection and enhancement of historic landscapes. Whilst an Open Space, Sport Facility and Playing Pitch Strategy was prepared as part of the evidence base, this is now over 5 years old. Since the time of this assessment over 2000 new homes have been built in the District and the recommendations may no longer be appropriate. This Strategy recommended additional provision of amenity green space and semi-natural green space. Section 8 of the Draft Plan on Infrastructure makes it clear that green infrastructure includes natural/semi-natural green space. It indicates that there is an irregular pattern of natural and semi-natural greenspace across the District and there is a poor level of provision in many parishes. However, Policy INF2 does not include any requirements relating to the provision of natural/semi-natural green space within new developments. As a minimum, Policy INF2 in the Local Plan should include the standards for natural/semi-natural green space recommended in the Open Space, Sport Facility and Playing Pitch Strategy. However, ideally the National Trust would like to see an up to date Green Infrastructure Strategy which could more appropriately address the requirements for different types of open space within new developments.

##### Essex County Council

ECC notes that Policy INF2 states Development will only be permitted if it would not involve the loss of open space for recreation, including allotments, playing pitches or sports facilities, except if: Replacement facilities will be provided of an equivalent or increased size and quality to serve the needs of the area; and which will be made available before development of the existing site begins; or It can be demonstrated that disposal will facilitate alternative investment in sports or leisure related activity(page 104). ECC recommends that further clarification is required to ensure that it is clear the above policy provision do not apply to schools. It is noted that surplus school land may on occasions be disposed of to fund better

education facilities i.e. not sports or leisure. Schools may need to expand on to former playing pitches/open spaces if they are to meet the demand generated by growth proposals in this draft Local Plan.

#### East Hertfordshire District Council

Policy INF2: Protection and Provision of Open Spaces, Sports Facilities and Playing Pitches: The Plan is unclear what the requirements are for open space for sport and recreation, including built facilities and outdoor playing pitches. Policy INF2 only sets standards for the provision of amenity green space, provision for children and young people and allotments. There is no standard or requirement for sports facilities including indoor facilities or outdoor playing pitches.

#### Takeley Parish Council

There is concern that the square footage per person for amenity space is too low. This needs to be increased to provide better social health and wellbeing amenity. 2 square metres for a child allows them two floor tiles. Leaps and LAPs should increase to 10 square metres in parallel to amenity green space. Reason: there are always grants for equipment that parish councils can obtain but recreational space cannot be regained at a later time. (The increase could mean fewer pieces of equipment but not exclude some basic provisions.) It would also be preferable if Amenity Greenspace could increase to 15 square metres or more per person. It is important the two things are defined by different numbers to avoid confusion that they are two separate requirements. The minimum garden space is considered 30 square metres for a 2 household occupancy and 50 sq metres for a 3 bed dwelling so other recreational amenity green space should reflect similar, ie 15 sq metres per person. Saffron Academy Trust

#### The Thaxted Society

INF2 Support robustly. Future obligations must have enforcement mechanisms tied to them Education and Skills Funding Agency.

#### Thaxted Parish council

Comment: But note the protection of allotment land under 1904 allotment act. Each Parish Council has a DUTY to make provisions for allotments. Proposed Action: Amend policy as proposed and note query re allotment land. And in addition, consider Using standards set by Fields in Trust and Natural England in relation to Green Space

#### Dunmow and District Chamber of Trade and Commerce

There is no mention of public car parks and not a lot on future sporting facilities. This is a poor District Plan

#### Sport England

The intentions and content of the policy are broadly supported as it represents an appropriate approach to securing sports facility provision required to meet the needs generated by new development as well as safeguarding existing sports facilities that are required for meeting community needs. However, the separate representation made on this policy relating to the evidence base that supports it requires consideration. Furthermore, the following specific comments are made on the policy: Criterion b The wording of criterion b of the policy is not consistent with paragraph 74 of the NPPF or Sport Englands playing fields policy that is applied as a statutory consultee to planning applications affecting playing fields <https://www.sportengland.org/facilities-planning/planning-for-sport/planning-applications/playing-field-land/> The policy appears to (or is likely to be interpreted to) support ~enabling development i.e. non-sports development involving the loss of sports facilities that would fund the provision of new or improved sports facilities. Enabling development would not accord with Government policy and should therefore not be provided for in this policy. Paragraph 74 of the NPPF does allow for development for alternative sports and recreational provision, the needs for which clearly outweigh the loss. This allows the principle of sports facilities to be developed directly on existing sport/recreation facility sites where it can be demonstrated that

the need for them outweigh the impact on the facilities affected. This is similar to exception E5 of Sport Englands playing fields policy. For example, the construction of a sports hall on a playing field could potentially accord with this policy approach. However enabling residential development on a playing field for instance that would fund a new sports facility would not accord with this approach. To address this concern it is requested that criterion (b) be replaced with wording that is consistent with the criteria in paragraph 74 of the NPPF. Green Space Standards The policy requires green spaces to be provided in accordance with the standards identified in the policy. However, the list of standards only applies to a few types of open space categories and there is no standards or alternative approach for assessing how development (outside specific requirements in site allocation policies) should make provision for indoor or outdoor sports facilities which policy INF2 covers. A more strategic concern is that even if the policy was amended to include standards for sports facilities, the use of generic standards for sports facilities would be inappropriate for the following reasons: The use of generic standards for securing provision in new development would not fully satisfy the CIL Regulation 122 tests. Sport England has prepared an advice note on this matter which can be made available which provides detailed advice on the issues associated with using such standards in relation to compliance with the CIL Regulations which is based on legal advice and recent case law. Consequently, there is potential for the use of the standard to be challenged in practice by developers. A potential generic standard such as outdoor sports or playing pitches does not allow the needs of individual sports to be distinguished and would not necessarily result in new development making a proportionate amount of provision for the individual sports. A generic standard would not consider the use of Sport Englands Playing Pitch Calculator which is a new tool that is now being widely used by local authorities to calculate the additional playing pitch needs generated by a new development (where an up-to-date and robust playing pitch strategy is in place) and identify the costs associated with meeting this need which can then be used as a basis for developer contributions. To address this concern, it would be appropriate to set out how new development should make provision for indoor and outdoor sports facilities having regard to the above advice and the separate representations made about the Councils evidence base, which, if satisfactorily addressed would provide an alternative approach to standards to address this matter.

Policy INF2 and other key policies in the plan such as INF1 and the policies applying to the proposed Garden Communities will be informed and justified by the Councils evidence base for sport which consists of the Open Space, Sport Facility and Playing Pitch Strategy (2012) and the subsequent Sports Facilities Development Strategy (2016). In response to the Issues and Options consultation in 2015 and in response to the Councils consultation on the 2016 strategy (in consultation responses dated 1 June 2015 and 16 October 2015 and at a meeting on 13 August 2015) concerns have been raised regarding the Sports Facilities Development Strategy. While the detail of the concerns are set out in the above correspondence (which Sport England can share with the Council again), in summary the strategy (and the preceding 2012 strategy) is not considered to represent a robust and up to date evidence base, as required by paragraph 73 of the NPPF for a range of reasons. It is not considered that it would be possible to retrospectively address these issues through amendments being made to the existing evidence base as many of the issues relate to the methodology for preparing the evidence. Without the issues raised in previous correspondence being addressed, the evidence base to justify policies such as INF2 which seek to protect existing facilities, support proposals for new/enhanced facilities or secure provision through development could be subject to challenge. Detailed guidance on the importance of having robust and up-to-date assessments of sports facility needs for underpinning local plan policies is set out in Sport England's 'Planning for Sport Forward Planning Guide' (2013) which can be downloaded from [www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/](http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/). This guidance advises that without a robust and up-to date evidence base for sport, local plans can be found unsound and explains the importance of having the evidence base in place for meeting the various tests of soundness. Sport England's recent experience has shown that where local plans have not been supported by up-to-date and robust assessments of need for sports facilities, Inspectors have requested that this be an issue that requires discussion at the public examination of the plans I would advise that most local planning authorities have prepared (or are preparing) up-to-date sports facility strategies (incorporating needs assessments) in advance of plans being considered at examination in order to ensure that the plans are

sound. Furthermore, if the policy is used for determining planning applications, developers are likely to challenge the evidence base especially in the context of the need to protect existing facilities or provide for sport in new development through planning obligations or CIL. To address these concerns, it is requested that the Council prepares an up-to-date sports facility strategy (indoor and outdoor sports) incorporating a comprehensive assessment of needs which will provide the robust evidence to support policies such as INF and INF2 as well as site allocation policies including the Garden Community site policies. In Sport Englands view, this approach would be justified to allow the local plan to be consistent with paragraph 73 of the NPPF. As well as meeting the needs of the local plan, the preparation of such strategies may also assist with delivering corporate Council objectives e.g. assisting with the health and well-being agenda, reviewing the future of Council owned assets, sports development, influencing investment on school sites, external funding bids etc. A robust evidence base for sport will also be needed to support the identification of strategic priority projects in the Councils Infrastructure Delivery Plan if CIL is implemented in due course. This would also apply if the Council continues to use planning obligations to secure developer contributions towards new and enhanced sports facilities instead as set out above. Following completion of the strategies, policy INF2 and other policies where applicable should be reviewed to add any specific sports facility needs that provision should be made for including site allocations and to review the approach towards securing sports facility provision through new development (i.e. an alternative approach to generic standards). Detailed advice on the preparation of sports facility strategies/assessments can be found on Sport England's website at [www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/](http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/) and further advice can be provided upon request. Sport England would be happy to meet the Council to discuss this response and other representations made on the local plan with a view to reaching a mutually agreeable solution before the local plan examination stage. Without prejudice to our position on the evidence base that supports the policy, separate comments have been made on the content of policy INF2.

#### Wendens Ambo Parish Council

WAPC believes UDC will have little or no control over this as roads, rail services, doctors surgeries, broadband etc are dependent on external parties. Currently there is little evidence to date of priority being given to Uttlesford District by Essex County Council in respect of basic services such as road repairs. How will UDC prevent houses being built before roads, broadband etc are confirmed and timetabled to be put in place in time? Uttlesford is already lagging behind and there are no guarantees for any of these essential services.

#### Littlebury Parish Council

The proposed level of provision of sports fields and recreational facilities are far below those of adjoining authorities. This is inadequate, and should be increased to similar levels. Doing so will help UDC achieve targets on existing policies on health, among others.

#### Saffron Walden Town Council

But note the protection of allotment land under 1904 allotment act, you cannot simply dispose of allotment land without Secretary of State permission. Allotment allocation is only 40% of recommended allocation. Need to define Quality etc. within the policy. Paragraph (b) to add and improved facilities Paragraph (c) to note that there is a preference for the provision to be within the site. Policy should state that provision should be to Sport England Design/Fields in Trust/Natural England standards Comment: We object to this policy in its current format as it is not well defined. It needs to be far more detailed and specific. Policy should also state that provision should be to Sport England standards and that provision of accessible green space and sports pitches should be to Fields in Trust and Natural England ANGsT standards as a minimum.

#### Neighbourhood Plan Coordinator Saffron Walden Neighbourhood Plan Steering Group

There is not enough! The allocation of 10 sq m is really mean! More of the development site needs to be set aside for green space, trees etc. More playing pitches and other sports facilities needed. The provision of allotments is only 40% of the level normally recommended. With gardens becoming smaller, these are likely to become more important. Housing numbers should not be based on the gross hectarage of the site. Provision also needed for burial space. Suggestion: Developers should be made to follow the standards set by Fields in Trust and Natural England

#### Coordinator Stansted Neighbourhood Plan Steering Group

There is not enough! The allocation of 10 sq m is really mean! More of the development site needs to be set aside for green space, trees etc. More playing pitches and other sports facilities needed. The provision of allotments is only 40% of the level normally recommended. With gardens becoming smaller, these are likely to become more important. Housing numbers should not be based on the gross hectarage of the site. Provision also needed for burial space. The policy plans for the towns and villages have two designations: Protected Open Space and Allocated Green Space Sites but we cannot find a policy that provides mention or protection of these spaces. Have we missed this? Suggestion: Developers should be made to follow the standards set by Fields in Trust and Natural England Provide a policy that sets out the function and protection of Protected Open Space and Allocated Green Space Sites.

#### Developers/landowners/site promoters

##### Iceni Projects

LAND AT HARVEY WAY/ASHDON ROAD, SAFFRON WALDEN Introduction Iceni Projects Ltd represents the landowners of the above site, referred to as 06Saf15 in the Strategic Housing Land Availability Assessment (SHLAA) 2015. A plan of the site is enclosed with this letter. Set-out below are our representations on the Draft Local Plan that is currently the subject of public consultation. These are submitted on behalf of the landowners. Comments on the Draft Local Plan and Evidence Base The site is designated in the Plan as Protected Open Space. This is essentially a designation that has once again been carried forward from the Adopted Local Plan. It is a reasonable expectation that the Council would have prepared some form of evidence base document to assess any new proposed areas of open space and to review existing open spaces to be carried forward, in order to ensure they continue to perform the necessary functions of open space. This is particularly so given the significant need for housing and other types of development in the district. Existing open spaces that no longer perform the necessary functions can be a far more sustainable option for development than allocating further land on the edges of settlements. Having consulted the evidence base, it is noted that an Open Space, Sport Facility and Playing Pitch Strategy was published in 2012. However, this included a site size threshold of 0.2 hectares, so the site at Harvey Way/Ashdon Road was not covered as it only extends to 0.17 hectares. Therefore, it appears that there is no evidence relating to the site, let alone any evidence to justify its retention as Protected Open Space. Site Assessment The site is under-utilised land that is not accessible to the public and has the potential to become an eyesore if left unmanaged. Its characteristics have remained the same for a considerable number of years. It is clear that the historic designation of the site was based purely on the wider visual amenity value the site was considered to offer, as opposed to its individual visual quality, ecological or recreational value. The planning landscape has altered significantly since the site was designated in the Adopted Local Plan and there is a need to consider whether this visual amenity value is outweighed by other factors. Given that Uttlesfords and Saffron Waldens development needs cannot be met within existing settlement boundaries, there is a need to maximise development on sustainably located sites such as this, thereby reducing the amount of development required in the countryside. Through the SHLAA process, it was demonstrated that development could be provided on the site that would provide a visual benefit by strengthening of the street scene via unified frontages on both Harvey Way and Ashdon Road. Combined with the need to maximise development within settlements, it is considered that the benefits of development on the site would outweigh the loss of the open space. Changes required to the Plan Ordinarily, the findings above would point to the Protected Open Space designation being removed from the site and the site being allocated for development instead. However, it is understood that the Local

Plan will not allocate any sites that have a capacity of less than 10 dwellings. In these circumstances it is proposed that the Protected Open Space designation be removed and this will have the effect of facilitating the development of the site as a windfall site. The Draft Local Plan anticipates 8.5% of the overall housing requirement being delivered via this source of sites. They provide an important contribution and it is vital that the Local Plan facilitates the development of sustainable windfall sites such as this one in order that the housing requirement can be met. We trust that the above is clear and look forward to working proactively with you to address the necessary changes to the Draft Local Plan.

#### Grant and Bloor

Policy INF2 Protection and Provision of Open Space, Sports Facilities and Playing Pitches 8.1 MGH and BH object to the low threshold for on-site provision of allotments. As currently worded, the policy requires on site provision for all schemes over 10 units. This is an unnecessarily onerous requirement that may not always be appropriate on all schemes. For example, a scheme of 10 units in a town centre location or a flatted scheme are both unlikely to be suitable for on-site allotment provision. This low threshold is inappropriate and could prevent the efficient use of land in certain locations and therefore make the Plan ineffective. 8.2 To remedy this objection it is recommended that the on-site threshold be raised to 50 with a note that such on-site provision will take into account the specifics of the scheme and the site location.

#### Grosvenor Britain & Ireland

Grosvenor Britain & Ireland (Grosvenor) support the recognition given to open space by Policy INF2 and Paragraphs 8.6-8.13 of the Plan in providing for healthy and active lifestyles. Provision of accessible open spaces at the North Uttlesford Garden Community can benefit existing communities in the North of the District where at present the land has very limited access rights with only one Public Right of Way. The provision of a variety of Open Space integrated into the new settlement will form a vital aspect of the placemaking approach providing opportunities for structural planting of new trees and hedgerows as well as integration of sustainable drainage features providing rich biodiversity and interest to the settlement. The North Uttlesford Garden Community will include a variety of open spaces including for recreation, play, sports pitches and allotments forming part of a network of green infrastructure and will seek to retain and enhance existing trees and hedgerows on the site

#### Individuals

Residents have to contribute to the management company/held to ransom/ lodge a sum with Parish so that leaps, laps and other open spaces can be maintained by them as part of the village infrastructure

Implies nothing enforceable for sports provision/define what is appropriate on-site

Amenity Space too low/use Sport England Standards

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

There will be significant positive impacts on health and social inclusion, and minor positive impacts on general infrastructure related sustainability objectives as a result of the policy

#### Alternatives Considered

The Policy approach ensures that open space and sports provision is ensured in new development whilst also taking a flexible and pragmatic approach in relation to development opportunities on land currently designated for such purposes. It is considered that any alternative approach could not be considered reasonable or otherwise distinctly different from the policy approach to warrant assessment within this SA.

#### Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

## Officer response

## Proposed changes to plan

### **Paragraph 8.14 -8.22/ Policy INF3**

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

Support	0
Object	6
Comment	9

## Overarching Summary

- Biggest health issue is lack of hospital beds
- Extra stress on services/residents
- ECC recommends paragraph 8.15 includes reference to the Uttlesford Health and Wellbeing Strategy, which also includes specific health targets
- Paragraph 8.15 Health and Well-being should mention places of worship to be compliant with section 171 of the NPPF
- Implies wrongly no improvements to walking/cycling
- Improve access to documents
- Health benefits of horse riding/exercise associated with the care of horses well documented/need more specific requirements for the provision of bridleways/NMUs
- This needs to be made much stronger. Liaison is inadequate- experience has shown that the health facilities are not expanded in line with demand. There should be a clause in developments that nothing can be occupied until such time as the infrastructure is in place. So Surgery provision etc. should be available as soon as new residents arrive, not some years later as happened at Stansted
- Health and Well-being should mention places of worship to be compliant with section 171 NPPF
- No evidence of how these aspirations will be delivered

## Statutory consultees and other bodies

### Essex County Council

ECC recommends that paragraph 8.15 includes reference to the Uttlesford Health and Wellbeing Strategy, which also includes specific health targets.

### CABO Essex and Cambridgeshire British Horse Society

Paragraph 8. 19: The health benefits of horse riding and all the exercise associated with the care of horses, are well documented. 75% of riders are female and many in the older age group, a group which is not high on the exercise league table within the general public. The provision of good equestrian access is vital to encourage/enable more people to benefit from equestrianism. The Plan should include more specific requirements for the provision of bridleways/NMUs

### Developers/landowners/site promoters

### Regeneration Adviser Diocese of Chelmsford

Paragraph 8.15 Health and Well-being should mention places of worship□ to be compliant with section 171 of the NPPF. Section 171 of the NPPF states: Health and well-being “ Local planning authorities should work with public health leads and health organisations to understand and take account of the health status

and needs of the local population (such as for sports, recreation and places of worship) including expected future changes, and any information about relevant barriers to improving health and well-being.

Paragraph 8.22 Health and Well-being should mention places of worship□ to be compliant with section 171 of the NPPF. Section 171 of the NPPF states: Health and well-being “ Local planning authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population (such as for sports, recreation and places of worship) including expected future changes, and any information about relevant barriers to improving health and well-being.

### Individuals

- Biggest health issue is lack of hospital beds
- Extra stress on services/residents
- Is this meant to justify not improving infrastructure in that residents should have to walk or cycle to work/ school?
- Cannot find documentation
- What and where is the 2008 publication by the Children's Food Trust?
- This needs to be made much stronger. Liaison is inadequate- experience has shown that the health facilities are not expanded in line with demand. There should be a clause in developments that nothing can be occupied until such time as the infrastructure is in place.
- There is no evidence of how these aspirations will be delivered in the case of North Uttlesford Garden Village or between it and the existing community at Great Chesterford

### Sustainability Appraisal June 2017

Not Applicable

### **Policy INF3**

This policy was responded to by 19 organisations and individuals.

Support	3
Object	5
Comment	11

### Overarching Summary

- Sport England welcome the principle of this policy but require HIAs include an assessment of design/promotes physical activity, embeds active design principles/how design promotes activity
- The Thaxted Society regard wellbeing as cornerstone to society policy
- Wendens Ambo Parish Council believe UDC has little or no control over these issues
- East Hertfordshire District Council commends requiring a HIA but require other aspects such as design included
- Saffron Walden Neighbourhood Plan Steering Group want a requirement that HIA be carried out/threshold of 10 units
- Stansted Neighbourhood Plan Steering Group want HIA threshold of 10 units
- Saffron Walden Town Council want HIA threshold of 10 units
- The Thaxted Society support/established policy
- Essex County Council seeks clarification as to who UDC sees advising the HIA once submitted/ECC lead on reviewing/requires further details of process
- Thaxted Parish Council want HIA threshold reduced
- Landowners/developers/retailers concerned policy not justified by evidence, better focused on design of all types of built development at the site
- Individuals concerned over obesity/wish to strictly control fast food outlets

## Statutory consultees and other bodies

- Planning Manager Sport England
- Chairman The Thaxted Society
- Clerk Wendens Ambo Parish Council
- Principal Planning Officer East Hertfordshire District Council
- Neighbourhood Plan Coordinator Saffron Walden Neighbourhood Plan Steering Group
- Coordinator Stansted Neighbourhood Plan Steering Group
- Town Clerk Saffron Walden Town Council
- The Thaxted Society
- Principal Planner Essex County Council Environment, Sustainability and Highways
- Thaxted Parish Council

### Planning Manager Sport England

The principle of this policy is welcomed but the policy and/or the supporting text should recognise that HIAs should include an assessment of how developments have been designed to provide environments that encourage physical activity. Sport England & Public Health England's Active Design guidance (2015) <http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/> sets out Government endorsed guidance on how the design and layout of new developments can be planned to provide the opportunity to make communities more active and healthier and aligns with Government planning policy in section 8 of the NPPF. The guidance includes 10 design principles that promote activity, health and stronger communities through design. Sport England is currently working with stakeholders such as local planning authorities to activate the guidance in practice through seeking to embed these principles into planning policy and design documents at the local level to help provide a framework for informing and assessing the design of proposals through the development management process. Of particular relevance in the local context is that Sport England is working closely with Essex County Council and the Essex districts/boroughs (including Uttlesford DC) through the Essex Planning Officers Association on the review of the Essex Design Guide (EDG) and is part funding the EDG review. The Active Design principles will be embedded into the EDG review which will provide advice on how the principles can be practically applied in a range of residential environments. In this context, it is considered important that HIAs for major developments give consideration to how design can encourage activity as this will assist with alignment with the EDG review as well as helping to deliver the wider activity and healthy lifestyle outcomes through new development in Uttlesford district.

### CHAIRMAN THE THAXTED SOCIETY

INF3 Wellbeing is a cornerstone to Society policy in this respect

### Clerk Wendens Ambo Parish Council

WAPC believes UDC will have little or no control over this as roads, rail services, doctors surgeries, broadband etc are dependent on external parties. Currently there is little evidence to date of priority being given to Uttlesford District by Essex County Council in respect of basic services such as road repairs. How will UDC prevent houses being built before roads, broadband etc are confirmed and timetabled to be put in place in time? Uttlesford is already lagging behind and there are no guarantees for any of these essential services.

### Principal Planning Officer East Hertfordshire District Council

Policy INF3 Health Impact Assessments: Whilst East Herts Council commends Policy INF3 on

requiring Health Impact Assessments, it is considered that the policy is limited to health facilities and restricting fast food takeaway uses, but omits other aspects such as the use of design tools to enable preventative health and wellbeing measures such as fit trails, formal and informal recreation, green spaces, street trees and priorities for walking and cycling over vehicle use. The Plan is non-committal on community spaces and places for worship apart from within the rural area. The Plan contains many policies on design, including on sustainable design, the environment and historic environment, which East Herts Council supports.

Neighbourhood Plan Coordinator Saffron Walden Neighbourhood Plan Steering Group

Health Impact Assessments (50 units) Good to see this policy but why no requirement to carry them out. Why 50? Means that in a rural environment like Uttlesford, a lot of smaller settlements make no contribution. Also, a smaller development for the elderly would require a health assessment. I was shocked to hear that the NHS were routinely not informed of new developments! Suggestion: Either change to 10 and make the rules the same as affordable housing or have a set amount per roof towards health.

Coordinator Stansted Neighbourhood Plan Steering Group

Â Good to see this policy but why no requirement to carry them out? Why 50? Means that in a rural environment like Uttlesford, a lot of smaller settlements make no contribution. Also, a smaller development for the elderly would require a health assessment. We are shocked to hear that the NHS is not routinely informed of new developments! Suggestion: Either change to 10 and make the rules the same as affordable housing or have a set amount per roof towards health.

Town Clerk Saffron Walden Town Council

50 units seem high. Health assessments should be made for smaller units especially where designed for elderly etc. In a rural district such as Uttlesford it is important that all developments, however, large make a contribution towards health Proposed: Consider reduction in policy. Change to 10 and make the rules as for affordable housing or levy a set amount per roof.

The Thaxted Society

Support. Thaxted Society established policy.

Principal Planner Essex County Council Environment, Sustainability and Highways

ECC in its Public Health role support liaison with NHS England and the Clinical Commissioning Group when looking at developments but would strongly encourage interaction with ECC Public Health colleagues for more specific advice on health improvement and ill-health prevention that impacts on a population level. ECC seeks clarification as to who UDC sees advising and reviewing the HIA once submitted. ECC Public Health would be the lead on reviewing HIA as they hold the responsibility for health and wellbeing and therefore would be required to be part of any review and mitigation process. The need to assess the impact of development on people's health and wellbeing is supported. ECC considers such assessments are a good evaluation tool to assess the impact of a development on the health of a community, to help develop potential ways to improve the quality of air and environment (including building resilience to climate change) and to make the local greenspace and leisure facilities more accessible. ECC seek clarification regarding the process being considered to determine the health impact of new development proposals, and in particular: How is the impact of health of new development to be undertaken? Who is to be consulted on the health impact assessments provided by developers? Is the impact of individual and/or cumulative impacts of development to be monitored? Also further clarification on the implementation of these aspects is sought following consultation on the Draft Local Plan, to ensure ECC works with UDC and developers to deliver high quality healthy places in which people can live and work.

## Thaxted Parish Council

Comment: The limit of 50 means that smaller settlements like those in rural communities such as Thaxted make no contribution. Proposed Action: Consider reduction

### Developers/landowners/site promoters

- Kentucky Fried Chicken (Great Britain) Limited
- Grosvenor Britain & Ireland
- Persimmon Homes Essex
- Planning Manager - Local Plans (South and East) House Builders Federation
- Pelham Structures Ltd
- Manor Oak Homes

#### Kentucky Fried Chicken (Great Britain) Limited

The policy focus on assessing the impact of specific uses is not justified by any evidence. It would be better to focus on the design of all types of built development at the site and area level to secure basic planning objectives. These include securing and protecting sustainable access (often by walking or cycling) to particular types and quantities of open space and other facilities. Managing health impacts is not an "add-on" to planning, but a core part of its purpose and should apply to all development. Furthermore, there is nothing inherent to hot food takeaways that necessitates greater scrutiny than any other retail uses. Many high street bakeries, coffee shops, cafes and pubs sell food of similar energy density and nutritional value to eat in or to take away. We suggest requiring assessment of characteristics such as walkability and distance to facilities (including a range of leisure and food options) be included within Design and Access Statements, which are already required by law for major developments. With regard to the funding of health services, this is primarily met through national insurance and taxation. Any contributions to infrastructure have to be defined in terms of scope and meet the tests at paragraph 204 of the National Planning Policy Framework.

#### Grosvenor Britain & Ireland

Grosvenor Britain & Ireland (Grosvenor) support Policy INF3 and Paragraphs 8.14-8.24 of the Plan in recognising the importance of Health and Well-being to communities. The North Uttlesford Garden Community will include facilities for the health and well-being of its residents including open space and provision for walking and cycling to encourage healthy lifestyles and community health buildings and facilities.

#### Persimmon Homes Essex

Persimmon supports the policy objectives which seek to improve health and wellbeing. INF3 requires a health impact assessment for identified development. The development plan should consider as part of its evidence base the broad implications of the allocations on health services and the necessary future capacity and infrastructure necessary to serve the needs arising. The Council should work with the Heath providers to ensure that measures can be put in place to mitigate the impact from the planned growth as timetabled. It is considered that this policy unduly places the burden on the developer to assess existing capacity, impacts and outline mitigation. This seeks to delegate the Council's responsibility to assess impact and work in partnership to facilitate development. A Policy INF3 should therefore:

- State that HIA should be based upon published publically available data (or provide some guidance or SPD)
- State that the Council will work proactively with Heath Providers and developers to ensure that the growth planned within the district is facilitated in a timely manner

#### Planning Manager - Local Plans (South and East) House Builders Federation

Health Impact Assessments We recognise the importance of ensuring new development supports the wider aims of local authorities and their partners to improve the health and well-being of their residents and workforce. However, the requirement for all residential applications of more than 50 units to undertake a Health Impact Assessment (HIA) is unnecessary and an additional burden on applicants.

The PPG sets out that HIAs may be a useful tool to use where there is expected to be significant impacts but it also outlines the importance of the local plan in considering the wider health issues in an area and ensuring policies respond to these. As such Local Plans should already have considered the impact of development on the health and well-being of their communities and set out policies to address any concerns. As such where a development is in line with policies in the local plan a HIA should not be necessary. Only where there is a departure from the plan should the Council consider requiring an HIA. We trust that these issues will be considered carefully by the Council and look forward to further consultation on the next iteration of the Local Plan. I would also like to be placed on your consultee database and receive updates on any further consultations with regard to the emerging Local Plan.

#### Pelham Structures Ltd

Health Impact Assessments 44. Policy INF3 Health Impact Assessments requires all new developments of over 50 units to provide a Health Impact Assessment (HIA). It is considered that this is an unnecessary burden on applicants. Planning Guidance sets out that HIAs may be a useful tool to use where there is expected to be significant impacts 45. As such the Local Plan will already have considered the impact of development on the health and well-being of communities and set out policies to address any concerns. Where a development accords with the policies in the local plan, an HIA should not be required.

#### Manor Oak Homes

Health Impact Assessments 61. Policy INF3 Health Impact Assessments requires all new developments of over 50 units to provide a Health Impact Assessment (HIA). It is considered that this is an unnecessary burden on applicants. Planning Guidance sets out that HIAs may be a useful tool to use where there is expected to be significant impacts. 62. As such the Local Plan will already have considered the impact of development on the health and well-being of communities and set out policies to address any concerns. Where a development accords with the policies in the local plan, an HIA should not be required.

#### Individuals

The UK has the highest level of obesity in Western Europe, ahead of countries such as France, Germany, Spain and Sweden (NHS report, 2013).

One in four of our population is obese, with the projection being half our population by 2050.

The presumption in Uttlesford should be AGAINST the granting of more planning consents and licenses to fast-food take-aways.

The starting point for health impact assessments should be 10 and developers asked to contribute an amount per roof.

#### Sustainability Appraisal June 2017

##### Significant, Temporal and Secondary Effects

There will be direct positive impacts on health and wellbeing as a result of the requirements of the Policy for Health impact Assessments from relevant developments. This is likely to additionally ensure secondary positive impacts on sustainable travel and infrastructure delivery, where the Policy (and HIAs) seek contributions towards new or enhanced provision of infrastructure, ensuring developments are designed to encourage safe walking and cycling, and provide consciously-designed open space, sport, recreational facilities and services and facilities to create opportunities and reduce barriers associated with healthy living.

##### Alternatives Considered

The Policy approach ensures that health impacts and improvements are identified and ensured through relevant developments as stipulated within the policy criterion. It is considered that any alternative approach could not be considered reasonable or otherwise distinctly different from the policy approach to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations  
No mitigation measures or recommendations are proposed.

Officer response

Proposed changes to plan

**Paragraph 8.24 – 8.28/Policy INF4**

This supporting text was responded to by 5 people/organisations.

Support	2
Object	0
Comment	3

Overarching Summary

- Support this
- Communities should be community (singular)
- Overhead fibre cables possible/cheaper to do this than to install the same cables in underground conduit
- Provide good broadband to some existing areas first

Statutory consultees and other bodies

Saffron Walden Town Council

Support this paragraph

Developers/landowners/site promoters

None

Individuals

Communities should be community (singular)

Overhead fibre cables possible/cheaper to do this than to install the same cables in underground conduit

Provide good broadband to some existing areas first

Where can details of the Superfast Essex Programme be found?

Sustainability Appraisal June 2017

Not Applicable

**Policy INF4**

This policy was responded to by 16 organisations and individuals.

Support	4
Object	3
Comment	11

Overarching Summary

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

#### Statutory consultees and other bodies

- Clerk Wendens Ambo Parish Council
- Chairman The Thaxted Society
- Town Clerk Saffron Walden Town Council
- Principal Planner Essex County Council Environment, Sustainability and Highways
- Thaxted Parish Council
- The Thaxted Society
- Neighbourhood Plan Coordinator Saffron Walden Neighbourhood Plan Steering Group
- Coordinator Stansted Neighbourhood Plan Steering Group
- Director Coke Gearing Consulting

Clerk Wendens Ambo Parish Council

WAPC believes UDC will have little or no control over this as roads, rail services, doctors surgeries, broadband etc are dependent on external parties. Currently there is little evidence to date of priority being given to Uttlesford District by Essex County Council in respect of basic services such as road repairs. How will UDC prevent houses being built before roads, broadband etc are confirmed and timetabled to be put in place in time? Uttlesford is already lagging behind and there are no guarantees for any of these essential services.

Chairman The Thaxted Society

INF4 Support. The Thaxted Society considers high-level technological provision to be the very bedrock of expansion in a rural area. The correct provision of broadband, and further oncoming communication paradigms, can provide connectedness and cohesion on a local level. Good communications availability contributes to the sustainability of the area.

Town Clerk Saffron Walden Town Council

Broadly support

The Thaxted Society

Support. The Thaxted Society considers high-level technological provision to be the very bedrock of expansion in a rural area. The correct provision of broadband and further oncoming communication

paradigms can provide connectedness and cohesion on a local level. Good communications availability contributes to the sustainability of the area.

#### Principal Planner Essex County Council Environment, Sustainability and Highways

ECC acknowledges the reference to high speed broadband in Policy INF4 that requires all new dwellings and non-residential buildings to be served by a superfast broadband connection, installed on an open access basis. The policy recognises that due to the District's rural nature there will be some properties and areas where it may be uneconomic to provide superfast broadband via fibre to serve small numbers of properties. In these circumstances, alternative technologies to provide broadband such as fixed wireless technology or radio broadband should be provided to be considered.

#### Thaxted Parish Council

Broadly support

#### Neighbourhood Plan Coordinator Saffron Walden Neighbourhood Plan Steering Group

Most broadband should be fibre based, otherwise developers will just use any old copper wiring they can get hold of. Also, Wi-Fi should be provided in areas where broadband is not superfast in order to increase connectivity.

#### Coordinator Stansted Neighbourhood Plan Steering Group

Most broadband should be fibre based, otherwise developers will just use any old copper wiring they can get hold of. Also, Wi-Fi should be provided in areas where broadband is not superfast in order to increase connectivity. Suggestion: Free, open Wi-Fi in commercial centres for social and recreational facilities, e.g. Lower Street, will sustain and promote area as a social hub

#### Director Coke Gearing Consulting

It cannot be overstated that one of the preconditions for any business seeking to be established within the locality would be the availability of superfast broadband. This applies equally to homeworkers, to SMEs or to larger corporate concerns, and whilst again the aspirations of the Plan are honourable, it seems to us that the delivery has been poor and there is no reason to believe that the Council would be in a position to improve or expedite a faster roll out of this vital service.

Cannot be overstated that superfast broadband is precondition for any business to be established/delivery poor thus far

#### Developers/landowners/site promoters

- Grosvenor Britain & Ireland
- Persimmon Homes Essex
- Policy Planner Gladman
- HFT

#### Grosvenor Britain & Ireland

Grosvenor Britain & Ireland (Grosvenor) support Policy INF4 and Paragraphs 8.25-8.29 of the Plan in recognising the importance of digital infrastructure to businesses and communities including in achieving behavioural change around travel through encouraging greater internalisation of journeys through enabling home-working.

#### Persimmon Homes Essex

Whilst the NPPF established that local planning authorities should seek support the expansion of electronic communications networks it does not seek to prevent development that does not have access to such networks. By stating all, new dwellings must be served by super-fast broadband potentially

allows for the Council to refuse a development without such provision or imposing a Grampian condition preventing a development from being occupied until such networks are provided. The provision of super-fast broadband is not in the control of the developer who requires a third party provider for such infrastructure.

Some growth should be allowed without super- fast broad band as its provision not in gift of the developer/reliant on other parties

It is also the case that the house building industry is fully aware of the benefits of having their homes connected to super-fast broadband and what their customers will demand. Whilst it is acknowledged that it may not be possible to provide fibre cable connections, the alternative means of wireless or radio broadband is not always practical and again is not within the control of the developer. In seeking to extend broadband to homes the Council should work proactively with telecommunications providers to extend provision and not rely on the development industry to provide for such infrastructure. In light of the above, the policy is considered unsound and is not supported.

A policy recognising the above/working with providers for delivery rather than reliant upon developers

Policy Planner Gladman

6.12. Policy TA3 Provision of Electric Charging Points for Vehicles and Policy INF4 High Quality Communications Infrastructure 6.12.1. The Council should ensure that the requirement for electric charging points for each new property and the provision of high quality communications infrastructure are properly tested through the Whole Plan Viability Assessment. Plans should be deliverable and sites should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. Therefore, the Council should assess the likely cumulative impacts on development in their area of all existing and proposed local standards and policies through a comprehensive and robust Viability Assessment to ensure that the cumulative impact of these standards and policies does not put the implementation of the Plan at serious risk.

The Council should ensure electric car parking requirements are properly tested via whole plan viability assessments/avoid putting delivery at risk

HFT

Emerging Policy HI: Housing Density It states that for sites adjacent to settlements, density should be 30-50 dwellings per hectare. However, it is not entirely clear how housing in more rural locations would be considered. If an application were determined using this parameter, this would likely be too dense to suit a countryside setting. Some flexibility may therefore need to be considered with this policy for rural locations, moving forwards. The policy should therefore be amended to ensure that delivering a lower density (where appropriate) in rural locations will be policy compliant.

#### Individuals

- The high quality and superfast broadband should be extended out of the towns and villages to those living in more rural locations. Broadband providers should extend their service areas to all houses and the District Council should support this.
- Again this proposal affects new developments without mentioning the existing deficiencies in broadband infrastructure for many rural local communities. What is being done NOW about speeding up the process of making high-speed broadband available to all local rural communities?
- Ultrafast broadband will be essential for all premises within this plan timescale. Current plans (with BDUK) do not go far enough and are already outdated.

#### Sustainability Appraisal June 2017

#### Significant, Temporal and Secondary Effects

The Policy will ensure direct positive impacts on employment and economic growth through the associations of homeworking with superfast broadband. The District is predominantly rural, with additional issues surrounding transport interconnectivity to many rural areas. As such, the Policy approach can be viewed as critical to ensuring sustainable development, with secondary positive impacts realised for those sustainability objectives related to sustainable transport (in reducing private vehicle trips and commuting) and also ensuring supporting infrastructure to growth in the District and improving existing conditions.

#### Alternatives Considered

In view of the baseline conditions within the District regarding accessibility and commuting patterns, it is considered that any alternative approach could not be considered reasonable or otherwise distinctly different from the policy approach to warrant assessment within this SA.

#### Mitigation Measures / Recommendations

No mitigation measures or recommendations