

## Chapter 15 – Glossary

No comments

## Chapter 16 – Appendix 1 – Replacement Policies

No Comments

## Chapter 17 - Appendix 2 - Monitoring Framework

Appendix 2 was responded to by 18 people and organisations.

Support	0
Object	10
Comment	20

## Summary of Representations

### Overarching Summary

- Detailed comments provided about the approach to monitoring and the wording of the Monitoring Framework including the objectives, targets, performance measures and who collects performance information.

### Statutory consultees and other bodies

**Diocese of Chelmsford - Objective 1d** – This objective is not compliant with the NPPF (paragraph 70) because it does not mention places of worship. It cannot be assumed that places of worship are included if they are not mentioned.

**Dunmow and District Chamber of Trade and Commerce** - Concern that the Council may not have the ability to monitor the plan given the council has an unsatisfactory track record of monitoring development.

### **Elsenham Parish Council**

**Objective 1a** – The Parish Council does not agree with the percentages allocated to 1, 2, 3 and 4+ bed dwellings. UDC should consult with Parish Councils on this matter, without the necessity for the lengthy and expensive procedure of producing a Neighbourhood Plan.

**Objective 3a** – A new second row should be included as follows: Target: No Development to be permitted in Stansted Airport Countryside Protection Zone contrary to policy. Performance Measure: Number of new dwellings permitted within the Countryside Protection Zone. Collected by: UDC.

### **Environment Agency**

**Objective 1d** – Unclear how Policy INF1 will be monitored under Objective 1d in the Monitoring Framework.

**National Trust - Objective 3a** – Support for the mechanism for monitoring the condition of SSSIs. However, there needs to be an acknowledgement in the document that Hatfield Forest is already suffering from deterioration due to increased visitor numbers. Without appropriate mitigation from new developments this could worsen. Without acknowledgement of the issues and the requirement for appropriate mitigation there is a strong possibility that this target will not be met.

### **Saffron Waldon Neighbourhood Plan Steering Group**

**Objective 1a** – Completion of 100 affordable homes per year only gives a total of 2,200 homes across the plan period based on the 40% (i.e. a total of only 5,500) homes without taking into account that a higher proportion of affordable homes are to be built in the new settlements. The target should be 250+ affordable homes per year, which is the need. If this number is not needed then developers should be asked for a smaller percentage provision, e.g. 25% which would enable developers to build a lot more two and three bedroom homes which would make them more affordable as market housing.

Housing Mix proposals are ludicrous and unfounded and will skew the market. Reasons given by ORS are based on history, e.g. adult children staying at home and East Europeans sharing large townhouses. 75% of new market housing should be 3 bed or less, as confirmed by the 2011 census and the latest government English Housing Survey. UDC should not be encouraging developers to build more large houses. The lack of supply of 2 and 3 bedroom homes can mean higher house prices. Suggest the following targets instead: 9% 1 bed; 23% 2 bed; 44% 3 bed; and 24% 4 bed.

**Objective 2c** – The first bullet point in Objective 2c should be amended to say: 'utilising the agreed capacity of the existing runway' otherwise it conflicts with the Corporate Plan. Planning permission is currently only for 35 mppa.

**Objective 3b** – Reduction on levels of air pollution is not specific enough. It is suggested that the Plan should say where the information will be reported, how it is accessed, at what intervals and what action is to be taken if the air quality is at dangerous levels.

### **Saffron Walden Town Council**

**Objective 1a / Target box** - States 100 affordable homes pa but this is insufficient to meet the requirements of the Local Plan. 14,100 homes required of which 40% are affordable = 5,640 affordable homes. 5,640 divided by 22 years of the Local Plan = 256 homes required pa. These targets should be amended to reflect the Local Plan requirements.

**Objective 1a** – Housing Mix Target – this should not include a significant proportion of 3 & 4 bedroom market housing. How does this cater for families that do not qualify for affordable housing and cannot afford 3 & 4 bedroom houses? This should state 2 & 3 bedroom affordable market housing. The housing mix should be similar to South Cambs – 30% 1 & 2 bed, 40% 3 bed and 30% 4 bed or as outlined in the Neighbourhood Plan for the area.

**Objective 1d / target box** – Clarification sought as to whether the targets for provision of allotments, sports pitches and public open space meet Sport England standards. Also need targets for indoor facilities.

**Objective 1d** – “Timely manner” is not defined. This should say at defined, pre-agreed trigger points. Should include reference to community shopping facilities. Broadly support this policy subject to these changes.

**Objective 3b** – Clarification sought as to the frequency and publication of information about the reduction in levels of air pollution. This should be issued at a defined time and at least annually.

### **Stansted Neighbourhood Plan Steering Group**

**Objective 1a** – Completion of 100 affordable homes per year only gives a total of 2,200 homes across the plan period based on the 40% (i.e. a total of only 5,500) homes without taking into account that a higher proportion of affordable homes are to be built in the new settlements. The target should be 250+ affordable homes per year, which is the need. If this number is not needed then developers should be asked for a smaller percentage provision, e.g. 25% which would enable developers to build a lot more two and three bedroom homes which would make them more affordable as market housing.

Housing Mix proposals are ludicrous and unfounded. Reasons given by ORS are based on history, e.g. adult children staying at home and East Europeans sharing large townhouses. 75% of new market housing should be 3 bed or less, as confirmed by the 2011 census and the latest government English Housing Survey. UDC should not be encouraging developers to build more large houses. The lack of supply of 2 and 3 bedroom homes can mean higher house prices Suggest the following targets instead: 9% 1 bed; 23% 2 bed; 44% 3 bed; and 24% 4 bed.

Sites are taking too long to develop which is unfair for on new residents living on a building site but paying full council tax. Apart from the new settlements, all sites should be completed over no more than a five-year period for any development less than 1000 homes.

**Objective 2c** – The first bullet point in Objective 2c should be amended to say: ‘utilising the agreed capacity of the existing runway’ otherwise it conflicts with the Corporate Plan. Planning permission is currently only for 35 mppa.

**Objective 3b** – Reduction on levels of air pollution is not specific enough. It is suggested that the Plan should say where the information will be reported, how it is accessed, at what intervals and what action is to be taken if the air quality is at dangerous levels.

### **Takeley Parish Council**

**Objective 2c** – The wording of objective 2c should be amended. Thi is not in line with other policies relating to Stansted Airport. It should read ‘Utilising the full capacity of the existing runway up to permitted development of 35 mppa.’

### **Thaxted Parish Council**

**Objective 1a / Target box** - States 100 affordable homes pa but this is insufficient to meet the requirements of the Local Plan. 14,100 homes required of which 40% are affordable = 5,640 affordable homes. 5,640 divided by 22 years of the Local Plan = 256 homes required pa. These targets should be amended to reflect the Local Plan requirements.

**Objective 1d / Target box** – Clarification sought as to whether these targets for provision of allotments, sports pitches and public open space meet Sport England standards.

**Objective 3b** – Clarification sought as to the frequency and publication of the information about reduction in levels of air pollution within AQMA. This should be issued at a defined time and at least annually.

### **WeAreResidents.org**

- The monitoring proposals are welcomed, but it is noted how poor some of them are, and the fact that the thresholds proposed are completely inadequate when looked at in relation to, for example, green space, sports provision, or affordable housing.
- It is difficult to assess the monitoring required in the absence of a district wide infrastructure plan. Until this is produced we cannot properly comment on the targets proposed.
- There is no delivery at all proposed of any community facilities or non-playing fields sports provision.
- There is nothing at all on sustainable transport and Objective 1c monitoring does not explain the meaning of smart travel solutions or require the delivery of any.
- Disagree with the focus on the provision of 4 bedroom homes rather than smaller ones and believe that the targets should be changed on accordance with the housing mix we have set out.
- There is nothing at all on schools, health facilities or other community facilities.
- The Appendix 2 targets are proposed only at a point in 2033 - there should be annual monitoring rather than waiting for the end of the Plan period.
- It is noted that Policy H6 is at odds with the Monitoring Framework provisions. Policy H6 requires 40% affordable housing which with an annual housing requirement of 640 new homes equates to 256 affordable homes per annum. Objective 1a targets require only 100 affordable homes per annum. This should be amended to 256.

### Developers, Agents and Land Owners

No responses from developers, agents and land owners.

### Comments by Individuals

#### **Objective 1a**

- The Table in Performance Measure, 2011 should not be followed by a new line. Under Target, in 'to provide', there seems to be a gash numeral 7.
- Concern that 91% of new homes will be 3 or 4 bedrooms. Few properties will be low cost and affordable. Safeguarding lower cost housing on the open market is essential. Housing Associations may protect tenants but how will local people afford the cheaper properties being sold if it is a "free for all"?
- Concern over the delivery of affordable and social housing for young local people given that it is planned for 91% of new homes to have 3 or more bedrooms.

### ***Objective 1d***

- The provision of playing field space is wholly inadequate. This Local Plan requires less than 10% of that required by the neighbouring local authority of Cambridge.

### ***Objective 2c***

- Objective 2c should be amended to correct 'using the full capacity'.
- There is no consideration made to the need to manage the noise and air pollution created by an ever expanding airport.
- UDC should not encourage any further expansion of the airport and should certainly not propose supporting utilisation of the existing runway beyond the existing planning cap of 35 mppa.

### ***Objective 3a***

- Support for the policy of safeguarding the historic environment, which is one of Uttlesford's greatest assets. The construction in the recent past of large housing estates close to historic settlements has been misguided and eroded some of the special character of the district. The same mistake should not be repeated in the future.

### ***Objective 3b***

- Development should be proscribed in AQMA regions, until mitigation measures have been identified, introduced and shown to be effective.

## Chapter 18

### Appendix 3 – Housing Trajectory

Appendix 3 was responded to by 5 people/organisations.

	TOTAL
Support	0
Object	2
Comment	3

#### Overarching Summary

- Braintree District Council suggest that for clarity and ease of reference delivery from the garden communities is separated out from the housing trajectory.
- Suggestion that the projected shortfall of homes could be met in one garden community.
- Concern that the housing trajectory does not match the housing need.
- Questioning of the 14,100 figure and suggestion that the figure should be closer to 11,500.
- Clarity requested in relation to when each year starts and ends.

#### Statutory consultees and other bodies

**Braintree District Council** - It may be of benefit to separate out the delivery from the three garden communities in the housing trajectory contained within Appendix 3 for clarity and ease of reference. Part of the work on the joint DPD will be to set out in more detail a housing trajectory and phasing plan for the West of Braintree, particularly focusing on the early stages of delivery. We look forward to continuing to work with UDC and further developing our relationship with officers and officers as we work together in a joined-up way to progress a new garden community at West of Braintree.

#### Developers/landowners/site promoters

No comments received.

#### Individuals

- These figures do not add up. There is a projected shortfall of 4,650 homes by 2033, however the Council have made provision for 25,000 new homes in 3 new 'Garden Village' settlements. The projected housing needs of Uttlesford could be met well into the second half of this century with only one of these settlements. This would result in less disruption for less people over a shorter period and more rapid delivery of infrastructure such as schools, doctor's surgeries and shops. For this reason, I consider the Council's draft Local Plan is deeply flawed.
- The assumption that 14,100 new builds will be required over the duration of the Plan has been questioned. Since this has a fundamental impact on the District, we need to re-

examine the arguments behind the value of 14,100. The true figure might be closer to 11,500.

- The total housing need has been divided by the plan period to make an annual figure - there is no analysis of where or when the need is. Housing trajectory should be related to housing need. Housing policies need to be closely related to 'where and when' the housing need is anticipated.
- There is a need to say where each year starts and ends (clearly not 31 Dec./1 Jan.)

## Chapter 19

### Appendix 4 - Garden Community Principles

23 people and organisations responded to Appendix 4.

Support	6
Object	2
Comment	15

#### Summary of Representations

##### Overarching Summary

- Some support for the garden community principles but also concerns that the principles will not be sufficiently adhered to by developers or Uttlesford District Council resulting in housing estates with no infrastructure. Obligations should be legally binding.
- Greater explanation and clarity requested including in relation to the operation of land value capture, delivery of the garden communities and management of the garden communities' assets.
- Environment Agency support the Principle 7 as it seeks to enhance the natural environment and suggest that UDC refer to the recently published TCPA guide - *The Art of Building a Garden City*.
- Some changes suggested to the wording of Principles 8 and 9.
- A more proactive approach to multi-user routes accessible to all vulnerable road users, such as equestrian users, is requested throughout the Plan including in the garden communities.
- Support for a locally-led, innovative and distinct approach to the visions and principles for developing and delivering the three new communities in Uttlesford.

##### Statutory consultees and other bodies

**British Horse Society** – Supports the comments made by Essex Bridleways Association with regard to the provision of equestrian access within this Policy.

**Environment Agency** – Support Principle 7 Development which enhances the natural environment. Suggest the Council will find useful, in helping to inform the development process, the Town and Country Planning Association's recently published practical guide to garden cities: *The Art of Building a Garden City*.

**Essex Bridleways Association** – It is noted that in Principle 9 there is an aspiration to encourage walking and cycling and this is not objected to. However, for clarification the opportunity to create multi-user routes accessible to all vulnerable road users should be more proactively taken and embedded into the whole Plan.

##### **Saffron Waldon Town Council**

Requests clarification on whether it is standard practice for a Garden City to be independently managed.

Principle 3 - "A suitable body will need to be established" this infers that this will be a body separate to UDC. Requests clarification of this point.

Principle 4 - Support "Mixed-tenure homes and housing types that are genuinely affordable for everyone".

Principle 9 - Add "or better connectivity is developed as part of the Garden City principle and infrastructure development".

### **Thaxted Parish Council**

Principle 3 - "A suitable body will need to be established": this infers that this will be a body separate to UDC. Requests clarification on this point.

Principle 9 - Add "or better connectivity is developed as part of the Garden City principle and infrastructure development".

Principle 10 – Welcome and support this.

### Developers, Agents and Land Owners

- With reference to the NPPF, the Government's 2014 Prospectus on Locally-led Garden Cities and the 2016 Prospectus on Locally-led Garden Villages, Towns and Cities it is clear that Government policy and guidance endorses the development of new settlements and their delivery following the principles of Garden Cities, however, it is also clear that Government does not consider the imposition of a national defined set of these principles or rules appropriate. Instead, local areas are challenged to adopt innovative approaches and solutions to creating great places based upon a local vision for the community. Having defined its Spatial Vision and Objectives for the District these should play a considerable part in developing the visions for the three new communities. Thinking, such as that of the Town and Country Planning Association, which goes considerably beyond that set out in Appendix 4, and others may play a part in informing approaches, but it is clear the visions and principles for developing and delivering the three new communities should seek to be innovative, distinct and locally led.
- Grosvenor has been appointed by the landowners as development partner for the North Uttlesford Garden Community and support the Council in proactively acting to designate the allocation for up to 5,000 new homes, alongside new infrastructure and amenities needed for a thriving new community. As the early proposals for the North Uttlesford Garden Community are developed, Grosvenor will work closely with the Council, local stakeholders and the community to get the principles for success right and will support the Council in ensuring the Plan allows for an innovative, distinct and locally-led approach to be undertaken.

### Comments by Individuals

- It is necessary to embody, state, and reiterate these Garden Community principles throughout the Local Plan including specifically where new housing developments are proposed.
- Support

- Unable to obtain the document referenced as The Garden City Principles published by the TCPA 10 April 2014.
- The reference to the Garden City principles being indivisible and an interlocking framework is repeated twice.
- Principle 1 - Unclear how land value capture works. Further clarification required on how the management company will be formed.
- There seems to be an unintended repeat of the footnote at the end of the section
- Whilst the stated ideas are noble, there is a high risk that the principles get watered down as the promotion progresses. Three very significant land allocations are being proposed with their justification in part based on the local community benefitting from the Garden City principles. It must therefore be completely guaranteed that the obligations promised are legally bound to be provided before any allocation is made.
- “Ideally, this requires a Development Corporation which could be led by a local authority” should be a part of the plan, not just an ideal. Further suggestion that the management organisation of the Garden Community must be clearly and readily accountable to the public. Questioning where is the plan for financing the Garden Communities. Suggestion that topography should also be an essential consideration when designing the settlement.
- Principle 8 - Infrastructure for electric vehicles should be included.
- Concern that a garden community is nothing more than an overwhelming housing estate on the edge of a historic market town, which will be enveloped in additional traffic, fumes and disturbance.
- All previous developments in Uttlesford, despite having Master Plans, have been dramatically changed due largely to changes in economic activity. During previous recessions, developers have demanded that conditions are changed and as a result places like Flitch Green do not have the promised facilities. Concerned that despite the principles recessions will come and infrastructure will not materialise leaving a huge housing estate which sucks the life out of the surrounding towns and villages.
- Uttlesford seems to have renamed but not rewritten the Garden City Principles. Are we referring to Garden Cities or Garden Communities? Requests clarification on which principles will be applied. Questioning whether UDC will ensure that land value is captured for the benefit of the new community (principle 1) and if UDC will ensure that jobs are created within the community (principle 5). It is suggested that UDC should have a firm stance on these principles from the outset, or there is opportunity to be exploited by developers.

## Chapter 20

### Appendix 5 – Marketing Assessment Information

This appendix was responded to by 5 organisations and one individual.

Support	0
Object	0
Comment	6

#### Overarching Summary

- Many developments at Thaxted have been allowed as 'exceptions'; indeed much of what has been built at UDC has occurred outside an LP
- Requirements under Appendix 5 should be rigorously reviewed and in some instances strengthened
- Where needed to make a development sustainable (e.g. Forest Hall Park) actual shops and other amenity should be built by the developer as part of the planning permission i.e. a shop or multi - purpose community centre which should be built by the time 30% of the development is complete.
- Under General Criteria, note that the Government has announced plans to abolish leasehold

#### Statutory consultees and other bodies

**The Thaxted Society** - Detail herein is critical to the frequent possible 'exceptions' implied within the plan. Many developments at Thaxted have been allowed as 'exceptions'; indeed much of what has been built at UDC has occurred outside an LP. Therefore we strongly urge that requirements under Appendix 5 are rigorously reviewed and in some instances strengthened. It is the business of business when it comes to development to gainsay the LP and LPA. Appendix 5 is an opportunity for UDC to demonstrate both professionalism and mettle in this matter.

#### **Saffron Walden Neighbourhood Plan Steering Group**

- Developers ask for too much money for land for e.g. shops which then makes the whole thing unviable. The developer makes it as difficult as possible so that they can reclaim the land for housing. Suggestion: Where needed to make a development sustainable (e.g. Forest Hall Park) actual shops and other amenity should be built by the developer as part of the planning permission i.e. a shop or multi - purpose community centre which should be built by the time 30% of the development is complete.
- General comment: No mention of what constitutes a major or significant development etc. Suggestion: Need to define in housing numbers. Air Quality Assessment Comment: Needs to be more specific Suggestion: Say what pollutants are measured and how frequently.

#### Developers/landowners/site promoters

- No comments received.

#### Individuals

- Under General Criteria, note that the Government has announced plans to abolish leasehold.

#### Sustainability Appraisal June 2017

Not applicable

## Chapter 21

### Appendix 6 – Existing Employment Sites Schedule

This appendix was responded to by 4 people/organisations.

Support	2
Object	2
Comment	1

#### Overarching Summary

- Gaunts End is located within the Countryside Protection Zone and no further development should be permitted.
- Allocation of Thremhall Park as a 'Principal Employment Area' is supported and has capacity for additional employment land
- Support identification of M11 Business Park (North) and M11 Business Park (South), Support their allocation in order to safeguard them for employment use and is suitable for extension but as the site is in the Green Belt it would require allocation of additional land
- Hoblongs Industrial Estate If suggested amendments to EMP1 and EMP2 and supporting text (DP3878 to DP3881) are not accepted, then it is requested that the land outlined on the attached plan (comprising the hotel and adjoining development area previously consented for hotel and restaurant uses) is removed from the existing Hoblongs Industrial Estate. This would allow for intended development options to be considered on their merits and brought forward without conflicting with the over rigid policy requirements as set out in EMP1 and EMP2.

#### Statutory consultees and other bodies

- **Elsenham Parish Council** - Gaunts End - The Parish Council wishes to draw attention to the fact that this site is within Stansted Airport Countryside Protection Zone, and as such it should not attract further development.

#### Developers/landowners/site promoters

- Support allocation of Thremhall Park as a 'Principal Employment Area'. ELR notes at recommendation R1 that Thremhall has the capacity to provide additional employment land during the Plan period, this is expanded on at Para 8.3.7 of the ELR which notes that, The existing site offers high quality business space within proximity to Stansted Airport and the M11. It is currently very well utilised and there is significant potential to increase the provision of high quality office (B1a) floorspace in this location. R1 also notes the requirement to meet the demand for small office units. Thremhall provides serviced office accommodation and is a key resource for small and medium sized businesses. We do not consider these policies offer sufficiently clear support for the further expansion at Thremhall, notwithstanding that this expansion is envisaged as a component of employment land supply during the Plan period.

- Support identification of M11 Business Park (North) and M11 Business Park (South), Support their allocation in order to safeguard them for employment use. Are suitable for extension, which would allow existing businesses to grow without needing to relocate. As site is in the Green Belt, expansion of site would require allocation of additional land, as per SLAA sites 03Sta15 - 05Sta15. Site benefits include:
  - Well placed for access to strategic road network compared to other proposed employment allocations (including Garden Communities e.g. amount of infrastructure required will significantly delay new development and shouldn't be relied upon to deliver employment land by the Council);
  - It occupies a central location within the M11 London Stansted Cambridge Corridor and the A120 Haven Gateway Corridor providing immediate access as a result of its proximity to a key junction to: Stansted Airport, Harwich and Felixstowe, and Eastlink 120 site in Braintree; -
  - Presents an opportunity to provide unconstrained expansion for sectors in bio-medical, logistics, manufacturing and low carbon industries which have a strong presence in the area;
  - Presents opportunity to ensure strong regional presence of existing employers remain within the local authority area and act as a catalyst for future sustainable growth;
  - Able to contribute towards cross-boundary strategic employment infrastructure; and
  - It is unconstrained for further successive phases of peripheral expansion.
- Hoblongs Industrial Estate If suggested amendments to EMP1 and EMP2 and supporting text (DP3878 to DP3881) are not accepted, then it is requested that the land outlined on the attached plan (comprising the hotel and adjoining development area previously consented for hotel and restaurant uses) is removed from the existing Hoblongs Industrial Estate. This would allow for intended development options to be considered on their merits and brought forward without conflicting with the over rigid policy requirements as set out in EMP1 and EMP2.

### Individuals

- As Gaunts End is within the CPZ, there should be a stop on further development beyond that which has already been approved, particularly in view of the acute difficulties in road access as highlighted by two government inspectors

### Sustainability Appraisal June 2017

Not applicable