

Uttlesford District Council
Regulation 18 Local Plan
Overarching Summaries of Representation

CHAPTER 1 – Introduction

- A number of responses express concerns over the traffic congestion that will result from the Garden Communities.
- Concern that the consultation period is undemocratic as it was undertaken in the school holidays.
- Concern that the SA does not consider reasonable alternatives.
- Concern that housing in the garden communities will not meet NPPF sustainability requirements.
- Questioning how housing targets have been reached due to the lack of a clear audit trail.
- Detailed comments on the SA in relation to Easton Park Garden Community proposal from Little Easton Parish Council.
- Some support for the Plan.
- The Plan should take into account emerging and adopted Neighbourhood plans.
- Questioning whether UDC has fulfilled Duty to Cooperate requirements, in particular with South Cambridgeshire District Council.
- It is noted that consultation was not held in the most convenient time (i.e. School summer holidays).
- The Reg 18 consultation only took into account written comments, rather than oral comments given at forums. This excludes certain groups of people.
- Concern that as the AMR has not been updated since 2014, and as such UDC does not properly understand housing supply and so risks a 5-year housing land supply shortfall.
- Concern over that the SA does not present a clear evidence trail in regard to the garden communities.
- A number of responses state that the Plan does not meet NPPF paragraphs 155 and 151.
- Concern is expressed that there are very few references to Neighbourhood Plans and that Neighbourhood Plans have not been taken into account in the process of preparing the Plan.
- Concern that there should be only one development plan document – the Local Plan.
- Request for clearer referencing and explanation of technical terms.
- Concerns that the Plan does not meet the tests of soundness including lack of evidence, inconsistent with national policy.
- Concern that consultation has been lip service only, contrary to the NPPF.
- Concern that the housing development is not required.
- Concern that the impact of the development proposed has not been considered.
- Belchamp's Lane, Rickling Green; and Land to the south-west of Brick Kiln Lane, Coney Acre, Rickling Green. The objectively assessed development needs (OAN) for the Local Plan period, between 2011 and 2033, includes 14,100 new homes (both

market and affordable). However, it is important that this figure should not be seen as a target, rather the minimum base line number of homes which the Local Plan will deliver over the plan period, with sufficient flexibility to adapt to rapid changes and ensure that the plan significantly boosts the supply of housing. Therefore, the Plan's ambition should be, to deliver significantly more than 14,100 homes.

- A number of representations question the validity of the SA and how it has been used to favour the garden community allocations. It is stated that a number of sites performed better in the SA than the garden community sites. Clarification is therefore sought as to why the garden community allocations were brought forward and other sites discounted.
- EA suggest that waste management should be included in the Plan to identify areas where significant improvements can be achieved.
- Concern is expressed over the sustainability of NUGC, in terms of vehicle usage, public transport links and employment offerings.
- Natural England are concerned that the Epping Forest SAC has been screened out of the HRA. They also have a number of other detailed comments in relation to the HRA.
- ECC recommend, among a number of suggestions, that UDC include a Recreational Disturbance Avoidance and Mitigation Strategy for recreational activities that will result from the garden communities.
- Concerns are raised as to why a number of sites are not included in the SA.
- It is suggested that the SA should be available for consultation.
- It is suggested that the development is needed in the north of the district where there is a demand for workers and housing, rather than the south of the district.
- The policies will destroy the district.
- Further details in the form of a summary are required of the policies to be replaced and the replacement policies.
- The reference to the Glossary is incorrect.
- Excessive and unsustainable development to the south of the district. Excessively deferential treatment of the north. Failure to engage with South Cambridgeshire, where there is a true demand for a highly qualified work force and additional housing.
- The Glossary is in Section 15, not 14.
- This statement is simply untrue. The policies will destroy the district. No attempt has been made to challenge the excessive and unreasonable house building numbers proposed.
- This section says policies written here will replace existing ones. Please can we have a summary of what is coming out or being significantly altered?

CHAPTER 2 – Spatial Portrait Vision and Objectives

- Representations note that the vision should mention travel and transport, as this is a key concern of residents.
- Concern is expressed over the lack of green space and sport facilities that are to be provided.

- Concern that the objectives and vision will not be realised due to a lack of proposals which ensure that infrastructure will be delivered.
- Concerns are expressed over the evidence base used to inform the plan.
- Biased, unsustainable objectives.
- There are a number of representations that ask for UDC to reference the population figure.
- A number of representations are concerned with the inaccuracies in the retail patterns of residents. The inaccuracies are outlined in the representations.
- A number of representations are concerned over the sustainability of the loss of agricultural land for development.
- Concerns that the garden communities will not be sustainable as they will rely on car usage which will increase already high pollution levels.
- Representations are concerned that many of the new residents of the garden communities will commute to work and add to the overcrowded trains.
- A number of representations question the notion that transport links are 'good'.
- Representations question whether employment opportunities are available for the residents of the new garden communities.
- Concerns are expressed over whether creating the garden communities supports the vision and the objective to conserve the natural environment.
- A number of representations question how sustainable transport will be provided for given the location of the garden communities, and lack of existing infrastructure.
- Representations support the aspirations for high quality design, however question how this will be ensured.
- Representations express the need for infrastructure (road, rail, broadband, water, sewage, hospitals and schools) to support existing and new communities.
- A number of comments on objective 2 question whether providing opportunities for employment at Stansted is a contradiction of UDC's position on objecting the second runway at Stansted.
- Concerns are expressed over whether creating the garden communities supports the vision and the objective to conserve the natural environment.
- Concerns that the delivery of timely and sufficient housing and affordable housing within the plan period via the proposed new strategic new settlement given the high infrastructure cost involved and the complexity of development.
- Concerns are expressed over the mechanism to deliver sustainable travel through different transportation options including vehicles, railway, cycling and bus.
- A number of representation expressed concerns over the provision of affordable housing for local people.

CHAPTER 3 – Spatial Strategy

Paragraphs 3.1 – 3.3

- The Plan is not ambitious enough – it should be a plan for the world in the 2020s. The garden communities provide the perfect opportunity for a sustainable local economy in the information age.

- The strategy is too focused on housing numbers at the expense of everything else.
- It is not clear when and where the houses are needed.
- Consider that a plan is needed, not a spatial portrait.
- The phrase garden communities conceals unpalatable truths.
- This plan is not sustainable due to the size and lack of infrastructure.
- The plan clearly does not respect the local character of Uttlesford and the villages to be directly affected by this plan, especially those nearby the West of Braintree site.

Presumption in favour of sustainable development

Paragraph 3.4 and Policy SP1

- Some support for Paragraph 3.4.
- Suggest include reference to making the efficient use of previously-developed (brownfield) land in accordance with national policy.
- Concern that there are no priorities between different goals which could lead to conflicts and negative impacts on Uttlesford.
- Concern that development should be accompanied by local business growth and sustainable transport.
- Clarification sought as to the definition of “sustainable development” and “presumption in favour of sustainable development” specifically for the local context. Suggestion that Policies S1 and S12 could be combined.
- Concerns raised regarding the following part of Policy SP1: ‘where there are no policies relevant to the application, or relevant policies are out of date at the time of making the decision, the Council will grant permission unless material considerations indicate otherwise’. The concern was that this position would undermine the Local Plan.
- Strong objections were expressed by Little Chesterford Parish Council, including assumptions for the stated housing numbers, the need to safeguard the separation of settlements, and the selection and delivery of the North Uttlesford Garden Village.
- Detailed wording changes suggested by a number of respondents.
- Concern that the audit trail for the Local Plan is incomplete particularly in relation to the Local Plan Sustainability Assessment process, including the transparency and availability of data, the interim SA Environment Report and some supporting decision-making evidence.
- Some support for the policy including from most of the landowners/ developers and Historic England.
- Some support for Paragraph 3.4.
- Suggest include reference to making the efficient use of previously-developed (brownfield) land in accordance with national policy.
- Concern that there are no priorities between different goals which could lead to conflicts and negative impacts on Uttlesford.
- Concern that development should be accompanied by local business growth and sustainable transport.

Spatial Strategy

Paragraphs 3.5-3.11

- Historic Environment suggests that archaeology should be included for in paragraph 3.8 to align with the NPPF.
- Taylor Wimpey are concerned that UDC will fall short of its stated annual housing requirement due to the complexity of the Garden Communities and the required infrastructure.
- Bloomhall suggest that the para. 3.6 be reworded to ensure sustainable development.
- Concern that the Countryside Protection Zone has previously been ignored by UDC. More assurance is sought on the sincerity of the CPZ.
- Concern that the rural character of the area has not been kept in regard to development.
- Concern that the West of Braintree development is being built on agricultural land.
- Concern that UDC is placing too much emphasis on Stansted Airport providing the majority of employment opportunities.
- Concern over the lack of transport infrastructure to support new developments.
- Suggestion that the Plan refer to more than just aircraft noise in relation to Aircraft Pollution.

Key Map

- West of Braintree Garden community is welcome by the site promoter, but the member of public raised concerns over the impacts on wildlife, Boxted Wood and historic Andrewfield airfield.
- A number of representation expressed concerns over the impacts of developments on the main highway including M11, A11, A120 given the increase in commuters.
- Some inconsistencies between the map and the policies in the plan are identified.
- Some representation suggested that brownfield should be developed, the Easton Park Garden Community should be smaller scale, and the developers should pay for the transport improvement scheme.

Settlement Hierarchy

Paragraphs 3.12-3.13

- Enodis Property Developments Ltd suggest that UDC should reconsider the settlement hierarchies so as that more development can occur in Type A Villages.
- Bloomhall also suggest that the Market Towns tier in the hierarchy is redefined to reflect the cross-boundary importance of Bishop's Stortford.
- Bloomhall are concerned that the Garden Communities will not be delivered on time and so there will be a housing shortfall.
- Thaxted Parish Council suggest para. 3.13 is amended to reflect that the Garden Communities are included in the Corporate Plan.
- Concern that the West of Braintree Development is not supported by strategic employment sites.
- Objection to Stebbing being included as a Type A Village
- Suggestion that Hatfield Heath is given a different classification.
- Clarification is sought on how new settlements will fit into the settlement hierarchy so as to aid development
- Concern that large developments do not fit in with the rural environment.

New Garden Communities

Paragraphs 3.14 – 3.15

- The ULP is not positively prepared and it does not meet development and infrastructure needs, and does not enable the delivery of sustainable development.
- Each proposed GC is in an unsustainable location and building all three within such close proximity will cause a detrimental impact to the area and associated amenities.
- There is a lack of road and rail infrastructure to support such settlements in these locations with no access to public transport
- There will be a detrimental impact caused to the countryside and rural landscape, wildlife, ancient woodlands, listed buildings, archaeology, surrounding villages setting and a loss of agricultural land
- The proposed locations will not allow for the provision of pedestrian or cycling routes due to their remoteness
- NUGC will not be served by adequate employment opportunities
- NUGC will be highly dependant on the car with a knock on effect caused to the already strained road network
- no evidence that the necessary transport, health, education or retail infrastructure will be provided, in place from the start & clearly planned for financially
- Rate of build needs to be increased
- support for 3 locations, considered to be only solution in these circumstances and will provide much added housing
- Duty to cooperate has not been fulfilled
- No proposed development adheres to the GC principles
- W.Braintree least sustainable of all three sites and loss of airfield is unacceptable

Market Towns – Saffron Walden and Great Dunmow

Paras. 3.16-3.17

- A new secondary school needs to be provided to meet the need of existing and future residents of the local area around Saffron Walden and Great Dunmow, and associated new developments.
- The proposed development to the east of Great Dunmow will dwarf the historic town and cause detrimental damage to its rural setting and market town feel.
- The time allocated to build the proposed housing developments as per the plan is unrealistic and will take many years to implement fully which is not sustainable or useful to the current situation.
- The provisions for infrastructure, including walking, cycling and public transport are not considered enough and the existing situation is not fully understood or accounted for.
- Unclear if new retail space is to be provided and if so what type and amount is planned for?
- Figures given in relation to Saffron Walden are not accurate and need to be recalculated or include recently granted permissions.

Villages

Paragraph 3.18-3.23

- Objections to a number of villages being classed as Type A villages: Quendon, Rickling, Great Chesterford, Stansted Mountfitchet, Takeley and Elsenham,
- Support for a number of village classifications: Great Canfield, High Easter, Thaxted, Newport, Elsenham, Hatfield Broad Oak and Stebbing.
- Suggestion that Felsted should be classed as a Type A Village.
- Suggestions that Wendons Ambo, Widdington, Felsted and Ugley should be allocated for more housing, due to having adequate services to support development.
- Suggestion that more development should be allocated in the villages instead of large developments, as this would support the rural population.
- Concern that Saffron Waldon does not have the services to support the West of Braintree garden community.
- Concern that the garden communities rely too heavily on the limited services in the villages.

The Countryside

Paragraph 3.24

- Great Chesterford Parish Council state that Great Chesterford should be considered to be countryside and development restricted to that which supports countryside uses.

Spatial Strategy Policy SP2 - Spatial Strategy 2011 - 2033

- The Local Plan appears to be overly-reliant on large strategic housing allocations which may not be deliverable within five years and which may not contribute positively to the Council's housing land supply;
- A clear need for additional sites to be identified for housing – sites that have the potential to deliver housing in the shorter / medium term. Small sites in established villages would be entirely deliverable in the short term.
- There is no provision for better infrastructure and the current roads (A120) will not withstand the increased traffic from 3 no. garden communities.
- The Garden Communities were not selected based on the evidence in the Sustainability Appraisal.
- A wider choice of type, size, location and design of properties should be spread across the district to give more choice to buyers and to allow for smaller house builders to develop sites.
- More employment sites should be allocated and in a range of locations.
- Many objections from individuals focus on concerns related to infrastructure provision for the new Garden Communities. Individuals are concerned that if rail links are not built to service the new developments then traffic congestion will become a problem.
- Individuals object to the Garden Communities as they feel that they will not be sensitive to the historic and natural environment in the rural area.
- There is an overwhelming amount of concern from individuals that the necessary infrastructure to service the new garden communities (such as schools, roads, sewage, water, health care) will not be provided for, especially by developers.

- Suggestions that infrastructure should be in place before the garden communities are built.
- Individuals are concerned that not enough affordable housing or bungalows will be built to meet local need.
- Individuals are concerned that there are not enough employment opportunities for the new residents of the communities.
- Many individuals think that the house prices will be too high, reflecting the demand from London commuters, not local residents who work at Stansted Airport on low income.
- There are concerns that the housing need projections for Uttlesford are too high.
- Individuals have suggested that Wendens Ambo could provide an appropriate location for development, given its proximity to existing rail links.
- Individuals have also suggested that Stansted Airport should not be allowed further growth beyond 35m passengers per annum until infrastructure improvements have been made. It is suggested that the plan reflects this.
- Many individuals support UDC's decision to remove Elsenham and Henham from the development proposals.
- Need identified to work across borders and through duty to cooperate.

Identifying and Meeting our Housing and Jobs Needs

Paragraphs 3.25 – 3.30

- Authorities in the West Essex and East Hertfordshire HMA should be required to set out in their Local Plans the necessary contingency measures should one authority be unable to meet their own needs within the Plan period.
- Whilst there has been co-operation in considering housing needs across the HMA the Councils need to further align their plans to provide greater certainty they will work together in meeting housing needs.
- The Objectively Assessed Needs identified within the recent SHMA show that unmet housing has been projected upwards. However, the DtC does not reflect this current position on housing distribution between the SHMA area authorities.
- There is no mention of Hertfordshire County Council as part of the Duty to Cooperate.
- Uttlesford needs to work extremely closely with the airport to ensure its issues are identified and addressed through the Local Plan so it can deliver its significant economic growth potential.
- Uttlesford is within the London Stansted Cambridge Corridor area and this should be noted in the plan.
- The proposal for North Uttlesford Garden Village lacks evidence of co-operation with S. Cambridgeshire and does not take account of the implications of their development plans for North Uttlesford.
- Uttlesford could adopt more of a leadership role with these adjacent authorities in the promotion of new business initiatives, modern networking to enable such development and high-tech hubs.

Vision for the London Stansted Cambridge Corridor Core Area

Paragraphs 3.31 – 3.34

- The Crossrail 2 will help to support the train services between Uttlesford and London.
- An integrated approach of rail-based public transport network within Uttlesford and Cambridgeshire is suggested, for instance Easton Park with Stanstead airport and North Uttlesford with Saffron Walden, Cambridge and Great Chesterford Stations via the proposed Cambridge-Haverhill railway.
- LSCC involvement in the preparation of plan may have conflict of conflict as it is funded by Stansted Airport.
- Any new development should ensure the provision of super-fast broadband.
- Some suggestions about wording and presentation were made.
- Additional housing allocation should be considered to take the London overflow on housing requirements in Uttlesford into account.

The West Essex and East Hertfordshire Strategic Housing Market and Functional Economic Market Area

Paragraphs 3.35 – 3.38

- Epping Forest District Council and Harlow District Council reminded that all three MOUs were signed in March 2017 already, and the latest joint evidence on FONH published in July 2017 should be referred.
- The council may risk a five-year housing supply shortfall of 737 dwellings and a plan period shortfall of 3,726 dwellings. Additional allocations should be considered.

Identifying the Housing Needs

Paragraphs 3.39 – 3.45

- A mechanism to review the housing needs is needed as unmet need of between 3,750 and 4,000 homes per annum may arise from the South Essex Housing Market Area (HMA).
- The discrepancy of housing needs between the (FOAN, July 2017) 13,332 and the housing target 14,100 in the draft local plan is not explained.
- The ten-year trend in relation to migration instead of the 5-year trend used by ONS in the Sub National Population Projections is not justified in the SHMA.
- 20% - 25% uplift should also be provided given the strong market demand. But a representation suggests that 10% is enough as supported by the inspector and similar figures from neighbouring councils.
- Concerned that the OAN of Uttlesford is more than one-fourth of the total housing needs of the West Essex and East Hertfordshire Strategic Housing Market.
- The total housing need should be 12,950 over the Plan period to 2033, using a stepped model which reflects the proper historical need.
- The SMHA does not take the effect of unmet housing demand in London given its proximity to London which has continued shortage of housing.
- The level of housing might reduce from 14,100 to 13,332 over the period of the Local Plan. Even lower need is likely because of reduction in migration due to Brexit and slower growth in Stansted Airport.
- Identification of housing needs should be specific to existing local people and the elderly.

Housing Supply

Paragraphs 3.46 – 3.49

- No explanation is given for the gross disparity between the number given to other key villages and the number for Hatfield Heath.
- Table 3.4: The Windfall Allowance row is titled incorrectly
- The methodology to then allocate the housing numbers to specific villages is based on data which remain in a high state of flux and needs reviewing.
- Great Chesterford's status as a key village must be removed unless NUGC is abandoned.
- The figures for Saffron Walden should be amended.
- If there are problems with housing delivery at the strategic sites then additional sites (small, medium and large) in a variety of sustainable locations should be identified to ensure that the housing target is met during the plan period.
- To prepare and publish a new and robust housing trajectory, amended to reflect realistic delivery rates at the strategic sites, to demonstrate that the proposed housing target can be met during the plan period.
- Realistic start dates and delivery rates are applied to these potential strategic development sites.
- The Council has failed to accommodate their own objectively assessed housing need.
- Windfall allowance too high over the plan period to be effective and is not consistent with the NPPF.
- The Spatial Strategy discriminates against small to medium sized builders by providing an insignificant supply of land for small schemes of 1-30 houses.
- Further and more up-to-date evidence on permission already granted needs to be evident within the plan.
- Many discrepancies within tables 3.5.

Policy SP3 - The Scale and Distribution of Housing Development

- Highways England note that the development in Saffron Walden and Great Dunmow will have a severe effect on the road network, suggesting that UDC should consider opportunities to link infrastructure to the airport and Easton Park.
- Thames Water consider that upgrades may be needed to the sewerage treatment works at Bishop Stortford.
- ECC suggest that it may be beneficial to allow some development in the Type A & B villages. ECC also suggest that clearer highway and transport mitigation measures are needed.
- Broxted, Great Chesterford and Stebbing Parish Councils suggest that the OAHN has been over-estimated.
- A number of developers suggest that the OAHN has been underestimated, which undermines the evidence base of the plan.
- CPREssex question the evidence base behind the new garden communities.
- EFDC support the policy, as it is in accordance with the Memorandum of Understanding on OAHN.
- The Woodland Trust has concerns regarding the locations of the site allocations in proximity to ancient woodland.

- HCC consider that ECC will provide new secondary schools to cope with the demand arising from new housing proposed in Uttlesford.
- A number of representations are concerned that the Memorandum of Understanding does not include Brentwood, which cannot meet its housing need.
- A number of developers suggest that more housing should be proposed for Type A and B villages to support sustainable development and help to ensure that there is not a housing shortfall in the District.
- A number of developers suggest that UDC will not be able to demonstrate a 5-year land supply of housing, as the Garden Communities will take longer to deliver than expected.
- Many individuals support the exclusion of NE Elsenham from the Plan.
- A number of individuals object to the Plan on the basis that new development will result in problems with traffic congestion.
- It is suggested that Stansted Mountfitchet should be allocated more development.

Provision of Jobs and Employment Land

Paragraph 3.50-5.54 and Policy SP4

- The policy is supported by our SHMA partners
- Over reliance on a small number of allocations for employment land. A range of additional sites for employment development should be allocated
- Over reliance on Stansted Airport to deliver jobs
- Employment statistics not accepted
- Concern that policy will not reduce out commuting.

Garden Communities

Paragraph 3.55 – 3.58 and Policy SP5

- The principles of the TCPA for Garden Communities cannot be fulfilled or complied with for development of GCs in Uttlesford.
- The infrastructure which will need to be implemented to support each new settlement has not been forecast or planned for in anyway which will in turn put major strain on the existing infrastructure services.
- Due to the rural nature of the district and location of the proposed sites, there is no possibility for a reduction in car use, but instead there will be a significant increase due to typography, location, railway station locations and commuter nature of settlement inhibitors.
- Rail links should be included in the design of each new GC to alleviate the use of private car and connect the towns property to other areas of the district and country.
- Employment land to provide local jobs and attract skilled workers to the area should form part of the plan for each GC settlement.
- Clarification on the term 'community land value capture' and what this means/results in.
- Rural character and distinctive landscape of the district will be ruined and public open countryside. Will be sacrificed.
- The timescales of the plan and implementation of homes is unrealistic and undeliverable. The SPDs required as per the plan will take longer then envisaged to adopt and put into practice.

- Affordable housing has already been cut down and what will be don't to require developers to implement this as per the plan and TCPA principles?
- Who is accountable for the delivery of the garden cities and associated infrastructure delivery?
- The plan needs to be aligned with and seek engagement with/of neighbouring authorities.
- As the timeframe for implementing development is contested there should be more smaller sites included to provide shorter term housing provision and retain 5YHLS.
- Suggestion that smaller sites should also be considered to meet the OAN.
- Concerns about the effect of the new settlements on the road infrastructure.
- A number of responses from land owners suggest too greater a reliance on new settlements and that there should be a greater role for Key Villages and/ or Type A Villages.
- Some responses from landowners with potential sites for employment land.
- Concern that development frameworks may take too long to prepare, particularly in the form of a DPD due to the need for Examination.

Easton Park Garden Community

Paragraph 3.59 and Policy SP6

- Key issues amongst the statutory consultees are about addressing the evidence base in relation to Sports Provision, the need for a detailed Water Cycle Study and a full Historic Impact Assessment. Manchester Airport Group expressed concern about potential impacts on Stansted Airport. The need to work with our partners on the transport impacts of the Garden Community is recognised, including Essex County Council, Hertfordshire County Council and the Highways Agency.
- Local communities are concerned about the impact of the Garden Community on the surrounding area. The main planning reasons for objecting to the development are:
 - inadequate existing transport infrastructure, especially existing highways and public transport, and concern that new infrastructure will not be able to solve these problems;
 - Concern that there may only be one access into the development;
 - sensitive landscapes and impact on the countryside;
 - important historic buildings and assets that will be adversely affected, most notably the Gardens of Easton Lodge;
 - noise and safety impacts from Stansted Airport;
 - adverse impact on wildlife, SSSIs and ancient woodland;
 - loss of high quality agricultural land;
 - lack of existing infrastructure and problems in funding and delivering new infrastructure, including education, health and shops;
 - relative remoteness from existing jobs and likelihood this will result in increases in car commuting;
 - concerns relating to coalescence with existing communities;
 - concern that negotiations may delay the start date for development on the Garden Community; and
 - concern that other new homes in the area are not selling already.

North Uttlesford Garden Community

Paragraphs 3.60 and 3.61

- Great Chesterford Parish Council considers there is no evidence that the NUGC site has potential or capacity for up to 5,000 dwellings given the site constraints of landscape, transport and heritage.
- Concerns that the cap of 3,300 dwellings before the strategic highways improvements is implemented will undermine the ability for the new garden community to sustain services or to be self-sufficient. Also, the highways improvements should be implemented before the development takes place.
- Details of the strategic transport improvements should be included in the Local Plan.
- Concerns about the timing of development bearing in mind the lead-in time required to prepare technical evidence and the provision of infrastructure.
- The site is not considered suitable or necessary in this location as it far from the employment sites at Stansted Airport which is where the housing need originates. There are limited jobs at Great Chesterford Science Park.

Policy SP7 – North Uttlesford Garden Community

Of the government/national /Local Planning Authorities:

Highways England consider this site probably has the least impact upon the SRN, although M11 J10 is a site of peak time congestion caused by capacity on the A505/not the junction itself. HE support the council in its requests to improve the A505 particularly between M11 J10 and the service area at the junction of the A1301.

The Environment Agency are generally supportive of the thrust of this policy although existing Uttlesford Water Cycle Study needs further detailed work (phase 2) prior to submission of the plan to be sound

Anglian Water Services Ltd note reference to enhancements being made at Great Chesterford Water Recycling Centre in Anglian Water's ownership to accommodate the foul flows. Note role of Asset Management Plan (AMP) in provision/suggest amendment to take account of long term provision/enhancements/SUDs.

Essex County Council notes NUGC is in north of Uttlesford/close proximity to Little Chesterford, and therefore seeks to strengthen the delivery and success of Chesterford Research Park. It supports London-Stansted-Cambridge Corridor, ensuring that skilled labour force in sectors have opportunity to locate in close proximity to employment. Need early delivery of a new secondary school. Need assessment of the historic environment/understand impacts such as on Roman Temple/its relationship to the Roman Town/conservation area.

Cambridgeshire County Council object to NUGC on transport impacts/reliant on large-scale improvements to the A505/ no scheme identified/no firm timescales for study work to begin. Also comment: The proposals for a new garden village at North Uttlesford do not raise significant education concerns.

Hertfordshire County Council is concerned over cumulative impact of development in and around Great Chesterford on the Hertfordshire network. In particular, the A505 runs to the north of the site providing east west connections to the A10 and A1. Junctions are already operating close to capacity in the Royston area and M11 junction 10 is a constraint.

Natural England given the scale of development proposed in this area expects to see consideration of impacts on Hildersham Woods and other nearby SSSIs and for avoidance/mitigation measures to be included in the policy as recommended in the SA.

Historic England welcomes the requirement for a Heritage Impact Assessment but Brief HIA (2017) already indicates site could not be developed without causing significant harm. It is unlikely that this can be satisfactorily mitigated/objection.

Harlow District Council refers to Policy SP6.1 - delivery of 10,000 new dwellings, of which a minimum provision by 2033/corresponding sentences for SP7 and SP8 do not specify figures as minima.

South Cambridgeshire District Council expressed concerns specially to the proposed North Uttlesford Garden Community regarding the sustainability of the proposal. The main issues are transport – impacts on A505/challenges to sustainable use, landscape, water supply, and ability to deliver facilities especially a secondary school

National Trust not clear no provision for a new country park/proposed for the other two garden villages. A new Country Park would reduce pressures on Hatfield Forest.

Most of the remaining bodies including Town/Parish Councils, developers, land owners and individuals consider North Uttlesford Garden Community as unsustainable and unsuitable, causing a number of concerns:

- **Size** - considered too large, there are several objections to the suggestion that a development of 5,000 houses can be called a village. Its footprint is considered too large compared to other existing settlements.
- Invalid basis for selecting NUGV **location**. The proposed location lacks any infrastructure to provide amenities within easy access and will instead require the need for cars. It is considered that the site will not going to meet the needs of Uttlesford residents as the site is on the northern edge of Uttlesford too far from the centres of **employment** in Uttlesford (Stansted and south towards Harlow).
- Not aligned with **Garden City principles**.
- Housing **affordability**.
- Increased housing supply for **commuters to London and Cambridge**, which will benefit more than the current residents.
- **Not serving local employment needs**.
- **Pressure on existing facilities and infrastructure** (some of them already under significant pressure): schools, health services, rail stations, parking around stations, highway network. Surgeries are understaffed, and the doctors and nurses are overworked.
- A1301/A505, M11/A505, and the A1307/Fourwentways, Junction 9 of M11/A11 require comprehensive study, and guaranteed financial commitment to the improvements.
- It is considered unrealistic to achieve 50% non-vehicles travel in the proposed new development, given high car ownership, poor bus services and lack of well-connected cycling lanes in rural area, and difficulties to cycling due to the topography.

- **Environmental impact:** flooding risks, including flooding caused by building 5,000 new homes on the upper slopes of a hill, extra sewerage, air pollution caused by road congestion and light pollution. Impact on the existing aquifer.
- **Negative impact on existing landscape,** wildlife, local rural character and heritage (particularly the Romano-Celtic Temple).
- The impact of such a large-scale development on the **water supply** or whether there will be sufficient capacity to sustain supplies in the future. The water in this area is from an aquifer.
- **Loss of agricultural land.**
- **Poor parking** for cars and bicycles around rail stations. The site is beyond reasonable walking distance from the station and there is no parking available there.
- The rural area has **no proper cycle lanes**, cycling is already hazardous and difficult due to the topography.
- **Cooperation with South Cambs considered to be poor and ineffective.**
- **Potential conflict of interest of councillors:** Uttlesford District Council is a 50% shareholder in Chesterford Research Park, and therefore it is considered that it has a vested interest in providing nearby housing and facilities to support and encourage the growth of the research park, and hence increase its return on investment
- More **transparency** is expected from Uttlesford DC. Some individuals consider that there is **very limited information currently** available to the public and the wider community directly affected by the proposed development is lacking and local residents are owed much greater detail in relation to detailed housing plans, environmental impact, funding, infrastructure and transport impact to be able to reasonably form a view of the viability of this new town. There are several concerns regarding the lack of a full and published Traffic Impact Assessment, released prior to the consultation period.
- Some concerns that the proposals would appear to be a hastily prepared submission with **minimal time for consultation** and reflection of the consequences. Some responders consider there has been an **insufficient consultation** period which took place over the summer holiday period when many people are away.

West of Braintree Garden Community

Paragraph 3.63 and Policy SP8

- Key issues amongst the statutory consultees are about addressing the evidence base in relation to Sports Provision, the need for a detailed Water Cycle Study, a full Historic Impact Assessment and a Minerals Resource Assessment. It is recognised that ongoing work with the County Council and Braintree District Council will be vital and the need for progressing issues and masterplanning jointly through the Development Plan Document process
- Consultees and respondents focus on a wide range of reasons to oppose the development. Many of the residents state that they moved to this part of the district for its rural quality and this would be lost when the Garden Community is developed. Main planning reasons for objecting to the development are:

- inadequate transport infrastructure, especially existing highways and public transport;
- deliverability given that the site straddles the district boundary and also includes a minerals site;
- sensitive landscapes and impact on the countryside;
- important historic buildings and assets that will be adversely affected;
- loss of an important airfield of historic significance;
- adverse impact on wildlife and ancient woodland;
- loss of high quality agricultural land;
- lack of infrastructure and problems in funding and delivering this, especially in relation to drainage.
- existing constraints in education and health facilities;
- relative remoteness from existing jobs and likelihood this will result in increases in car commuting; and
- concerns about flood risks.

Development Limits

Paragraph 3.63 and Policy SP9

- Overall support for policy
- Additional criteria suggested covering impacts on natural environment; historic environment; air quality; infrastructure.
- Developers are seeking a relaxation in the policy to allow greater flexibility as this can lead to sustainable development.

Development in the Countryside

Paragraphs 3.64 - 3.74 and Policy SP10

- Recognition of importance of best and most versatile agricultural land welcome
- Reference biodiversity in separate bullet point for clarity
- Requirement for development to protect and enhance the countryside and landscape character is welcome
- Requirement to clarify the pressures referred to in the policy regarding Stansted Airport
- Continued Countryside Protection Zone (CPZ) designation is supported
- Concern raised over future of CPZ due to the proposed Easton Park development
- Inadvertent alteration of the substance of place through unplanned growth will be impossible to mitigate
- North Uttlesford Garden Community (NUGC) will significantly damage the countryside
- Development of NUGC is contrary to SP10 principles
- Retention of the Green Belt is important for the preservation of character and essence of Birchanger

- Amalgamation of three policies i.e. (Saved Policy S6 (Metropolitan Green Belt), Policy S7 (The Countryside) and Policy S8 (Countryside Protection Zone) weakens the longstanding Policy 8
- Classification of agricultural land as Class 2 underestimates subtleties of individual areas of marginal land
- Concern was raised about UDC's rigid adherence to MGB and CPZ historic boundaries
- Metropolitan Green Belt not delineated in accordance with NPPF paragraph 85 stating the LPA "should define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."
- SP10 deemed a protection policy that resists development unless certain criteria are met
- Due to restrictiveness SP10 certain sustainable development opportunities classed as "countryside and protected."
- SP10 protects land for its intrinsic character and beauty whilst NPPF paragraph 17 requires LPA to "recognise" the intrinsic character and beauty of the countryside
- Difficult to locate Policies Map on website
- Querying existence of Policies Map
- Reference to Development Limits should be replaced with a broad definition of settlements beyond which land is considered to be Countryside (approach being followed by other LPAs)
- SP10 considered not effective and not positively prepared as it seeks to hinder potentially sustainable sites in the countryside
- Conflict between protecting agricultural land and supporting biodiversity
- Need to support biodiversity should be prioritised
- Objection to omission of reference to Countryside Protection Zone (CPZ) after "MGB" in penultimate sentence in paragraph 3.74.
- Countryside Protection Zone's integrity compromised by development of 300 dwellings and an additional smaller site allowed on appeal
- Land south of A120 should be released from Green Belt to employment uses as it does not currently fulfil Green Belt purposes
- Request to undertake a Metropolitan Green Belt Review with Limekiln Lane as a firm southern boundary.
- Inflexibility of approach to Green Belt release regarded as hindering release of land that could contribute to vitality of Type A Villages such as Leaden Roding.
- Clarification required on who is responsible for identification of need to infill
- Development of Garden Communities on rural land seen as contradictory to the protection of countryside assets
- Scale of new settlement development does not respect quality or character of area
- Need to provide bridleways

**London Stansted Airport
Paragraphs 3.75 – 3.88 and Policy SP11**

'Of the 125 comments received on the policy, there were 77 'standard' comments stating the Policy should be amended in line with Objective 2c. The remaining 48 comments were on different aspects of Policy SP11.

'Standard' comment

- Policy SP11 (Stansted) should be amended in line with Objective 2c "Plans should not allow any further growth beyond the 35 million passengers per annum approved limit.

Sustainable Development Principles Paragraphs 3.89 – 3.94 and Policy SP12

- Support for the policy in principle and specific elements of the policy. Suggestions made for amending wording to ensure consistency with national policy, clarity and to address inconsistencies with other policies proposed in the Regulation 18 Draft Local Plan. Concern that the use of the term sustainable development in the policy is not inclusive of all aspects of sustainability.
- Irreversible loss of assets such as greenfield land and agricultural land (e.g. new garden communities) are considered contrary not only to this policy but also the National Planning Policy Framework and Core Planning principles.
- Definition of previously developed land and the criteria for under-used land should be consistent with the NPPF and included in supporting text to make policy more robust.
- Clarity required in relation to development at risk of flooding.
- Support for greater emphasis on reducing energy demand and including specific and clear energy efficiency targets, air pollution targets and emissions targets to make the policy stronger.
- Suggest merge Policy SP1 and SP12.
- Suggest a sequential approach to new development.
- Concern that the content of Policy GEN4 in the Adopted Local Plan will not be adequately replaced by Policy SP12.

CHAPTER 4 HOUSING

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

Policy 1- Housing - Density

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

Policy 2 - Housing Mix

- Greater need for smaller properties.

Policy H3 - Subdivision of Dwellings

- Ensuring sufficient off street parking

Policy H4 - Residential Extensions and Replacement Dwellings

- Concern over consistency of policy with national guidance.

Policy H5 - Residential Development in Settlements without Development Limits

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

Policy H6 - Affordable Housing

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

Policy H7 - Affordable Housing on Exception Sites

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

Policy H8 - Self Build and Custom Build Housing

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

Policy H9 - Accommodation for Gypsies, Travellers and Travelling Showpeople

- Policy should refer to means of disposal of foul effluent.
- Need to clearly identify what the needs are and is approach of criteria policy sound.
- Need for further evidence on needs of those who no longer meet definition for planning policy purposes.
- Formally requested to evaluate evidence to determine whether there is the potential to assist in meeting the unmet need in Basildon for Traveller pitches prior to progressing Local Plan to Regulation 19.

Policy H10 - Accessible Homes and Housing for Older People

Paragraphs 4.40 – 4.41 and Policy H10

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

CHAPTER 5 EMPLOYMENT

- Development of a large town centre at West Of Braintree Garden Community will adversely affect the viability of Braintree
- Aspiration to achieve one job per dwelling is quite ambitious and no evidence that this target can be met
- Only airport related business should be allowed at Stansted Airport
- There should be an oversupply of industrial space to depress land values and to keep rents low
- The Local Plan must be revised to reinforce a commitment to B1(c) and B2 businesses in all three garden villages
- Greater effort required to increase local employment opportunities to reduce long commutes
- Objection to over-reliance on Stansted Airport as a driver for job creation
- No sound assessments to evidence commercial viability of creating employment and retail investment and opportunities for residents of the new settlements that would prevent them from commuting and shopping in existing urban centres and thereby exacerbating already crowded streets and parking, and in Saffron Walden exacerbating illegal air quality hot spots
- Rather than "in association with new garden communities", this should read "as an integral part of new garden communities". This would seem to be a basic requirement of GC principals and would also contribute to sustainability of GCs; and
- Not enough local business or employment opportunities to match the proposed housing. Job shortfall.
- This requires good transport links to the enterprise areas.
- The policy of settling 3 new garden communities in this area and attracting the amount of high skilled and high paid work to sustain this vast volume of people to the area is not borne out based on the council's current track record, where it appears to be a hugely reliant on commuting for the current residents. More towns are not the answer but a cohesive policy to attract good quality companies and work to the area to service the current growing communities and to relieve the need for commuting and the pressures on the transport infrastructure. Basically to make us competitive to attract jobs, rather than build these new commuter towns in inappropriate locations increasing current North Essex issues!
- I am very concerned to see that projected employment numbers at Stansted Airport, which have previously been quoted as the raison d'etre for the new housing developments in Harlow, are now being recycled and reused as 'evidence' that the Easton Park development will also supply these same employees/jobs with housing.
- The draft Plan focuses discussion of employment largely on Stansted Airport and Chesterford Park. Many new employment sites identified are small. Identifying larger potential employment sites should be a priority to attract larger businesses and a greater range of employment. The plan relies heavily on residents of new settlements working locally to achieve sustainable communities, but there is little detail on how this will be achieved. In North Uttlesford, there is the opportunity to bring in large numbers of high skill and ancillary jobs by attracting high tech companies from Cambridge, as we understand that some are now unable to find single sites there of sufficient size for their long term needs.
- This statement is the 'Aim' as laid out in the development strategy relating to Thaxted. It is detailed on page 12 of the strategy under the heading 'Town Centres' Query: What is tangible? How is this to be achieved in a market town with diminishing industry and agricultural land being utilised for new homes.

Employment Land Requirements

- Please state where the Employment Land Review Update 2017 can be found.
- As currently worded would appear to restrict development within existing and proposed employment areas to Class B uses. It is considered that such a restriction is unnecessary and is likely to unduly prohibit sustainable employment generating development, which may otherwise be delivered. For these reasons Policies EMP2 and EMP1 and the supporting text at paragraphs 5.46 and 5.4 as currently drafted are not compatible with National Planning Policy set out in the NPPF and do not represent the most appropriate approach to planning for sustainable economic development. Consequently, it is considered that the draft Local Plan remains 'unsound' in the context of paragraph 182 of the NPPF and requires amendment as set out below, which would address our objections. Para 5.4 - Revise to include the following sentence after the fifth bullet point: It is also acknowledged that other appropriate sui-generis and complementary employment generating uses may be permitted within employment areas as guided by EMP1 and EMP2.
- The ELR seems to be based upon a direct link between population growth and employment requirement - this takes no account of the expansion requirements of existing business or inward migration (e.g. from NE London or Harlow) of businesses looking to locate in the District. Local and highly respected commercial agents, Coke Gearing has advised the respondents that it is their experience through the many enquiries they receive that urgent provision of sites is needed now to meet a known demand.
- Timeframes for the delivery of the floorspace figures quoted under Paragraph 5.7 should be specified, given that UDC has a vested interest in the delivery of the site.
- Predicted 900 jobs at Great Chesterford Research Park should not be used as a justification for the allocation of North Uttlesford Garden Village (NUGV).
- Whether the risk posed by Brexit and the impact this will have on employment and housing need has been considered.

Jobs Growth

- The difference of 10 JPA between the Medium and High Growth scenario's is doubtful;
- The number of new jobs does not equal the number of houses proposed;
- Significant numbers of extra jobs will need to be provided throughout the district to avoid the planned additional housing simply increasing out commuting;
- The figures provided are broad assumptions without evidence;
- Concerns that growth is based on unreliable figures of employment. The STAL projection provided in its G2 application of 15,300 jobs looks more accurate.
- The figures provided are broad assumptions without evidence.
- Where can the BRES be found?

Office Floorspace Requirements

- Where can the ELR and Employment Land Monitoring be found?

Industrial Land Requirements

- There is a surplus of vacant new warehousing space at London Stansted Airport. Takeley PC does not believe that new warehousing should be built elsewhere within

its parish and that there is a suitable area within the airport to provide for ancillary businesses of the airport.

- Local Plan should make provision to encourage occupation of these units. Perhaps reduced rates for a period of time? Offer business incentive? Policy should reflect the commercial market need.
- Local Plan should provision alternative sites for office accommodation for SW. Industrial/warehouses should be converted to office accommodation to reflect market need.
- Need to identify appropriate mitigation measures to improve the capacity of the junction 8 of the M11 to take account of the cumulative impacts of growth from residential and airport related development, including aspiration for 'strategic' warehouse and distribution depots
- Saffron Walden is blighted by failure of successive administrations to address the traffic flow and pollution issues through the town. There is poor access for commercial vehicles leading to loss of retail opportunities, and poor facilities for visitors to the centre.
- The difficulty of accessing the M11 from Saffron Walden suggests that efforts be made to secure a junction nearer the town. But, it could be argued that not having a junction close to the town eases development pressures.

Opportunities within Existing 'Clusters' assessed in the ELR

- Note that the Printpack factory is a safeguarded employment site as per Appendix 6;
- Saffron Walden Business Centre not shown as an existing employment site on the Saffron Walden inset map, whilst it is shown as an Existing Employment Site in Appendix 6 (Site 18);
- The boundary of the Business Centre should be expanded to include the Homebase store.

Existing Commitments

- Where is the latest monitoring data?
- Great Chesterford Research Park (GCRP) and land at London Stansted Airport is not suitable for larger shed development. GCRP the site is not suitable for larger shed development and land at the airport is subject to significant constraint.

Saffron Walden

- What information is there on the number of people working from home and how this maybe supported, as this can help reduce traffic.

Gaunts End, Elsenham

- What information is there on the number of people working from home and how this maybe supported, as this can help reduce traffic?

Start Hill, Great Hallingbury

- Given that Start Hill has now been fully developed, the 'Vision Stansted' site (Land west of Bedlar's Green, Great Hallingbury) should be allocated for employment purposes.

Proposed Sites for Additional Employment Allocations

- There has been no consideration of employment opportunities at all in Thaxted e.g. retail, office.

Garden Communities

- Paragraph seems to re-interpret and understand Garden Community Principle 5 (GCP5) as stated in Appendix 5. Paragraph 5.35 should be closer intertwined with GCP5 should have a clear objective to meet GCP5, reducing the need to travel and provide no less than one job per household;
- Unlikely that genuine employment will materialise in developer-led artificial settlement as suggested;
- Delivery of employment will be long after delivery of housing and infrastructure.
- Nature of employment development will be small scale and largely retail/ service sector related. Are employment requirements now which are not been met due to lack of supply of available land.

London Stansted Airport (Northern Ancillary Area)

- The Northern Ancillary Area site is subject to a number of constraints both physical, legal and in terms of servicing and access;
- These issues mean that securing land for employment development is very difficult in the short to medium term;
- Understood a significant area of this site is soon to be the subject to a planning application for a large single user; will significantly reduce the availability of land for localised SME led demand in this area.
- Any supply is subject to the operational needs of the airport operator, who is currently consulting on further expansion of the airport, which will inevitably have an impact on the appetite for non-core activities and puts a further question mark over the reliance on this site, as providing a supply of readily available land to meet the local and migratory needs of businesses.

Chesterford Research Park

- There is a conflict of interest with Uttlesford District Council having purchased a 50% share of the holding of the site and the site has subsequently been allocated as an employment site.

Training

- Local Plan does not mention proposed further education college/a new site for Harlow College at Stansted Airport. This is an essential vocational college, in particular to meet the needs of the airport area that will offer courses from engineering to customer service.

Electronic Infrastructure

- Although the Plan refers to the need for broadband to be improved, it is not ambitious enough.
- The stated target of 10Mb/s is the minimum that a modern family home needs today. This will be totally inadequate to in the future, for either domestic needs as broadcast TV gives way to on demand streamed services and home working becomes more common.

- The target should be at least 100Mb/s with technology that can be upgraded to 1GB/s as needed.
- Technologies exist to deliver these speeds in dispersed rural areas without the limitations of radio and satellite referred to and should be implemented quickly to maintain the competitiveness of the District.

Tourism

- The reference to the role that built heritage has to play in the tourism industry, this is welcomed;
- Tourism seems an obvious area of major employment potential that is neglected in this plan. What about provision for increased tourist accommodation? Support for local tourist, catering and entertainment industries?

Policy EMP1 - Employment Strategy

- Suggestion that larger business sites include space for 'incubator/new businesses'.
- We should be about proactively encouraging employment opportunities in the Garden Communities, not just supporting.
- There is no provision for new employment land outside of the Garden Communities and Stansted.
- We should explicitly support the intensification/ expansion of the Principal Employment Areas.
- The wording of EMP1 is excessively restrictive with regard to supporting (non B-class) uses.
- Concern related to permitting non airport related uses on 43 ha of land at Bury Lodge Lane. Lifting the airport restriction could have consequences for accommodating airport related growth in the future.
- Additional land should be allocated adjacent to existing employment sites in the Green Belt to allow expansion. With no provision to allow the expansion/ growth of new/ existing business and employment sites, existing firms won't be able to expand their current premises, so will need to relocate.
- We should place greater emphasis on supporting high-tech industries.
- We should support its Chesterford Research Park's further expansion to assist meeting the overall employment need.
- We should add greater focus and measures to specifically support the construction industry.

Existing Employment Areas

- How does this EMP2 work with permitted rights to change from business to residential if you don't change the external appearance? Great Chesterford already has around 10 dwellings created in this way in Station Rd, Great Chesterford which is included in your employments sites schedule; more are likely to follow.
- Policy, as currently worded would appear to restrict development within existing and proposed employment areas to Class B uses. Para 5.46 - Revise to read as follows: (new text underlined, deleted text strike through) The policy recognises that there is a significant amount of employment generated by appropriate sui-generis and other complementary uses, e.g. builders merchants and car showrooms, which may be permitted as part of the overall employment strategy.

Policy EMP2 - Existing and Proposed Employment Areas

- Concerns around the level of interest for employment land in the district.
- The NPPF states that 'Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.'
- Policy does not acknowledge important role of supporting (non B-class) uses in establishing successful business parks.
- We should clearly support the intensification of Principal Employment Areas.
- Employment sites in the Green Belt should be reviewed so as to allow reasonable expansion of existing employment sites.
- Allocations for future employment land being placed in just two locations (Chesterford and MAG Northern Ancillary Area) does not assist businesses seeking land that is available now, for non-office related employment development.
- We should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing.
- The plan should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances.
- Concerns over the marketing period suggested in the policy, either being too long or too short.
- Conversion to residential should not be encouraged.

Policy EMP3 - Non-Estate Employment Uses

- EMP3: As before with improved enforcement criteria for evidence base Appendix 5;
- Again, why invite change of use?
- Change of use should not be encouraged beyond what is already permitted development. To note Saffron Walden Business Centre (map18) is not shown on Saffron Walden inset map "is not shown as employment area. Proposed Change: Note error on map which needs to be amended
- To be commended - Support policy

Existing Employment Areas

- Accepting that rural economy needs protecting, maybe, 1% of housing stock could be released on an agricultural tenancy, therefore giving low paid farmworkers a home.

Policy EMP4 - Rural Economy

- Broadly in support of this policy, as recent experience has shown that re-allocation of vacant farm buildings and agricultural use to full scale employment use provides a welcome supply of new accommodation and a sensible re-use of otherwise redundant buildings.
- Support wholeheartedly. Examples are both imaginative and visionary. Re-use and adaptation should be the bywords for rural commercial development and the Society's policy of encouraging a revival in crafts and making fits well with this policy.
- Support the Policy. Please ensure more bridleways are provided that link up to the existing network.
- The plan abuses the local environment.
- Rural Economy - No mention of sustainability.
- Saffron Walden also needs a hotel badly as Cambridge cannot meet current demand. Saffron Hall is limited in its offering as rooms are needed for orchestras etc.

- Schemes should be encouraged to generate their own energy and to minimise use of the car.
- Welcome requirements within this policy for development proposals to respect landscape character. Request that a similar level of protection is added for the wider historic environment.
- The policy seeks to encourage tourism and therefore it would be pertinent to refer to the potential that developments of tourist and leisure facilities may have in enhancing, better revealing and providing access to the historic environment.

CHAPTER 6 - Retail

Retail

- Retail and commercial units on the edge of towns
- Support retail in smaller towns
- Provide support to local shops
- Better explanation of terms
- Section not consistent, Not capturing all the main food shopping
- Where does the local plan address loss of Village services
- Is there costing for maintaining health and well-being in small communities with such services compared with no services

Retail Strategy

- Out of Town retail cannot be encouraged at NUGC to the detriment of Saffron Walden.
- Traffic consequences will be significant and adverse.
- Whether it would be appropriate for retail provision in the proposed neighbourhood centres to be restricted to just a supermarket and small convenience shops for a settlement of this size.

Policy RET1 Town and Local Centre Strategy

- Saffron Walden NP note no mention of increasing SW town centre retail area with a need to support independent shops in Saffron Walden to maintain character of town
- Saffron Walden Town Council support policy noting hierarchy of Saffron Walden/do not support out of town retail
- Littlebury Parish Council consider the growth of on line shopping/impact not addressed
- Stansted Mountfitchet NP consider 30 minutes of free parking needed Grafton/Lower Street
- Braintree District welcome inclusion of local centre for West of Braintree/consider likely that the size of the West of Braintree garden community may require a town centre in the long term
- Thaxted Society support with improved compliance
- Thaxted Parish support
- Individuals note new developments need to be sustainable, doubt that the Garden Communities will reach the size/pace necessary to support local retail services, travelling to Saffron Walden requires a car, retail outside of Saffron Walden only where not viable in the town centre

- Developers consider West of Braintree Garden Community provide local centres for day to day needs, within walking or cycling distance
- Switch from A1 retail to a range of service uses including A3/A4 and D1 and D2.
- The new communities should provide retail floor space in order to meet the day-to-day needs of the new settlements residents and to create a vibrant centre in order to encourage social interaction and a sense of community.
- New retail opportunities are supported in Thaxted village to ensure its longer term vitality and viability.
- Important that daily retail needs are met at the outset to minimise traffic movements and develop the community.

Policy RET 2 The Location and Impact of New Retail Development

- Saffron Walden/ Stansted Neighbourhood Plan Steering Groups/Saffron Town Council add out of town retail only if no town centre site/convenience stores are needed on developments more than 500m from retail centres
- Harlow Council welcome recognition of retail hierarchy/future retail floor space for each garden community could be linked to Retail Impact Assessment threshold in Policy RET2 (1000m²).
- The Thaxted Society support with improved compliance
- Developer considers threshold in proposed Policy RET2 is not based on any empirical evidence/ should be 750sqm for out of centre retail development
- Individual want out of centre applications to show they will provide a net increase in jobs

Policy RET3 Town and Local Centres and Shopping Frontages

- Saffron Walden Town Council query if prevents A3 uses in the town centre/reduces protection
- Saffron Walden/ Stansted Neighbourhood Plan Steering Groups/Saffron Town Council consider reduces protection/ prioritise primary shopping frontages to remain so, especially in Saffron Walden, not allow change of use from A1
- The Thaxted Society opposes any change of use from retail/considers the encouragement of revived crafts and arts to fulfil both retail growth and tourist attraction.

Policy RET4 Loss of Shops and Other Facilities

- Thaxted Society consider criteria for viability in Appendix 5 be strengthened and then enforced
- Saffron Walden/ Stansted Neighbourhood Plan Steering Groups/Saffron Town Council request policy to prevent pubs from becoming Express stores under permitted development rights.

Policy RET5 New Shops in Rural Areas

- Saffron Walden Town Council supports with requirement on foot/cycle paths
- The Thaxted Society concerned over new retail beyond development Limits/protect centre

- Thaxted Parish Council requires footpaths cycle paths to access such development
- Saffron Walden/Stansted Neighbourhood Plan Steering Group requires policy to support all community facilities, e.g. churches, pubs, schools, halls, museums etc

Chapter 5 – Transport

Paragraphs 7.1

- Repetition causing confusion should be addressed for clarity.

Paragraph 7.2

- Insufficient detail on transport impacts/mitigation
- Lack of public transport/effective IDP/ employment provision for NUGC
- 22500 dwellings proposed between Rayne and Braintree on A120/limited assessment
- Rat running via Stebbing, Felsted, and Dunmow

Paragraph 7.3

- Bridleway network is fragmented, inadequate and requires improvement
- Non-motorised multi user paths instead of shared pedestrian/cycling paths that damage bridleway network
- Such paths available to widest group of users as possible for North Uttlesford Garden Community design
- Paths to be correctly designated either bridleway or restricted byway
- The A120 is already saturated several times a day
- Some repetition/remove

Paragraph 7.4

- Often no reliable alternatives to car travel/lack of a good public transport network. What is planned?

Paragraph 7.5

- NUGC creates dormitory town for South Cambridgeshire research parks employees/shoppers in Saffron Walden
- Additional policies needed to improve public transport
- Need cycle way from Latchmore Bank A1060 into Bishops Stortford
- Acknowledge role Bishop's Stortford plays in delivering services and transport to UDC
- The dominant mode of travel in Uttlesford is the car/ GCs located where need to travel will be minimised/ but rail, as the most sustainable means of transport, does not feature
- The walking network in Saffron Walden is not "well connected"/one pedestrian crossing

Paragraph 7.6

- Consider electric bikes
- Implement existing cycling strategy
- Lack of public transport network
- Include equestrians on cycle routes
- Lack of detailed transport assessment

- Complete the Flitch Way Bridle path from Takeley to Dunmow South roundabout
- All new developments should be made to include safe cycle routes to the nearest transport hub.

Paragraph 7.7

- No modelling has been carried out to consider the impact of NUGC on Saffron Walden
- The proposed alternative route to avoid the SW town centre still passes through the AQMA
- What will happen if the Peasland Road TRO is not implemented
- Saffron Walden traffic solutions must not to encourage more heavy traffic through Thaxted

Paragraph 7.8

- No solution has been found to address unacceptable traffic impacts in Saffron Walden
- Need southern ring road for Saffron Walden

Paragraph 7.9

- Add future and existing Section 106
- Points to NUGC being car-reliant
- Needs a reference to Air Quality
- Query plans for the Kier site/150 homes
- The proposal for full transport and air pollution studies of Saffron Walden is sound

Paragraph 7.10

- Easton Park GC can only make traffic congestion considerably worse in Great Dunmow
- Travelling from NUGC to Audley End for London trains
- Most sustainable transport impact small-scale, incremental development, following historic and natural growth of rural towns and villages
- For NUGC what public transport, how will it be paid for and who will have control?
- Even if NUGC is considered to have the least traffic impact, very substantial trip movements, mostly by car

Paragraph 7.11

- Allocate Beldham's Lane for housing on fringe of Bishops Stortford given services
- Recognise the importance of Bishop's Stortford in providing UDC services
- Reflect high car ownership in parking provision for new developments
- Seems realistic/cycling as a leisure activity also attracts tourism, if investment in good cycle paths

Paragraph 7.12

- Welcomed but failure to recognise importance of Bishop's Stortford
- Not only improve existing services but improve where possible to encourage use of public transport.
- The local press has recently reported that bus services are to be or have been reduced.

Paragraph 7.13

- Equestrians should be included on all Multi User paths unless it is not possible to do so, following consultation with the BHS.

- Existing facilities mentioned are insufficient for existing use - so growth equals over demand/there needs to be effective planning of new facilities.
- Must be rigidly enforced when planning applications are made. Multiuser paths are not the safest way to proceed. Cycle routes should be separated from footways.
- Be radical and provide cycle paths generating electricity.

Paragraph 7.14

- Omits that Flitch Way is mostly a definitive Bridleway, not a cycleway/mention of equestrian users
- Flitch Way is a country park is for leisure activity not be viewed as an alternative Cycle highway

Paragraph 7.15

- Need more ambitious modal shift for garden communities/step change
- Travel plans must be supported by a robust series of measures, infrastructure and incentives/penalties
- Locate growth in areas where need to travel minimised/ maximise use of sustainable transport modes
- Creating a self-contained garden village/serving life sciences defeated by topography and location
- NUGC selection is incompatible with creating a self-contained garden village
- Destinations for employment, education and social centre walkable or within 5 to 15 minutes easy cycling distance.
- Residents will have to travel long distances by road for employment by the evidence in this Plan

Paragraph 7.16

- Take account of on-demand services/car sharing/spaces for community vehicles

Paragraph 7.18

- Saffron Walden is choked with traffic already/need by pass to reduce traffic in the town
- Need more than culture change/Improve access to rail
- need plan for electric car infrastructure
- no safe walking/cycle routes to key facilities or school
- Innovation needed- community run services/ speed up local journeys or journeys to railway hubs.

Paragraph 7.19

- Henham 7/7a bus service service is running at a loss but is essential
- Travel Plan too vague, urgent need for better public transport, area is isolated, no bus connection between Great Dunmow and Bishops Stortford, re-establish a rail service/better bus services for Great Dunmow

Policy T1 – Accessible Development

- Uttlesford Futures [education] note getting to work relies on car, lower use of cars not possible in isolated villages, key public transport role of Stansted/its limitations, encourage buses to call at GCs/employment sites - Genome/Stansted excellent, improve cycle and footpaths to existing and new sites, wider political pressure needed to draw in resources

- Clare College consider NUGC not located where it can be linked to services by a range of transport options/cycle routes will be problematic/ train station too far away
- Little Easton Parish Council consider TA1 incompatible with Vision - SP2 due to Easton Park GC given high reliance on car and presence of M11 J8 that is close to capacity, only aspiration for employment/highway measures, reliance on rail improvements that are not programmed
- Little Chesterford Parish Council consider NUGC not located where it can be linked to services and facilities, cycle routes problematic, train station too far away and too much gradient to be used, aspirational accessibility and integration, impacts on A505 untested
- Little Chesterford Parish Council consider NUGC does not meet aims of the policy with no access plans/reliance on B184/Saffron Walden, A505 already at capacity
- Chrishall Parish Council state new growth should be linked to existing facilities by cycle paths/footpaths/roads dangerous/reduce pollution/needed prior to commencement
- Essex County Council note Travel Plans and Transport Assessments/Statements are very different
- Essex Bridleways/Cambs Horse Society want all opportunities taken to enhance the off road network so accessible to all users including equestrians
- The Thaxted Society supports policy that reduces car use/journeys/public transport limited/avoid bridge to nowhere/lobby government for sustainable transport
- Saffron Walden Town Council support policy but need definition of appropriate and safe network
- Saffron Walden/Stansted Mountfitchet NPs want towns and garden villages linked with cycle paths with opportunity for NPs to go into more detail
- Coke Gearing concerned too aspirational, too car reliant, no account of reality/need to expand existing car parking facilities around railway stations e.g. Stansted Mountfitchet, Elsenham, Chesterford
- Requested more comprehensive study for NUGC/A505 at capacity/two GC option better impact
- Great Dunmow lack rail link/frequent bus service
- No need to be negative about reducing car use, given the rural nature of our area
- Mitigation proposed will not cope with growth/too aspirational
- Car sharing sensible as an option but cannot legislate to force people down this path
- Travel Plans for major developments should be defined/exempting specialised housing for older people as a low traffic generator
- Support Council ambition to reduce need to travel by car/increase the use of public transport/ should be located in locations which are sustainable

Policy T2 – Sustainable Transport

- Uttlesford Futures acknowledge ageing population/rural isolation recognise essential bus services, community travel, Dart scheme wanting encouragement of buses to call at employment sites,
- Highways England Support plan policies aimed at reducing need to travel by private car, such as improved walking, cycling public transport infrastructure, and broadband

- Essex Bridleways Association/Essex & Cambs Horse Society welcome mention of equestrian access but want proactive approach to enhancement of network from new growth
- Sustainable Uttlesford want a more strategic approach to link all the new expanded settlements to nearest service centres e.g. A120 Bishops Stortford/Braintree, objective to minimise car journeys/NUGC assisting this by providing housing for knowledge economy
- Network Rail supports increasing rail patronage/measures subject to business case
- The Thaxted Society supports policy that reduces car use/journeys/public transport limited/avoid bridge to nowhere/lobby government for sustainable transport
- Saffron Walden Town Council Supports this policy/seeks definition of appropriate/safe network
- Saffron Walden Neighbourhood/Stansted Plan Steering Groups request Rights of Way, cycling, pedestrian Towns and garden villages should be linked with cycle paths/Opportunity for NP to go into more detail
- Littlebury Parish Council all new developments must be connected by safe walking and cycling routes to the local facilities they will use/design of new settlements should incorporate a comprehensive network
- Clerk Little Easton Parish Council concerned Easton Park would be relatively isolated and motor transport will be the only realistic mode for residents
- Essex County Council welcomes improving sustainable transportation connectivity between Braintree Stansted and Bishop Stortford/ amend bullet point 1 reference to multi-users/as it is noted that not all routes can accommodate multi users
- Individuals_note; Rail is most sustainable form of transport, In UDC no route to the Wellcome Institute, no safe route from Great Chesterford to Saffron Walden.or Saffron Walden to Chesterford Research Park or Thaxted to either Great Dunmow or Saffron Walden. Need a critical mass of people on bikes/supporting infrastructure/cycle and pedestrian-only routes from settlements to places of work/essential services
- Require; Investment in the existing public transport across region/detailed plan for links for the proposed developments, Cycle/pedestrian routes meander not sustainable unless to wider network, Cycling got to be easy, appealing and safe.

Policy TA3 – Provision of electric Charging Points for Vehicles

- Need policy on Electric Charging provision that is not in new development
- Government anticipates all new vehicles must be hybrid or electric by 2040
- Why not insist on charging facilities for development with no get outs
- Developers free to design developments without charging facilities/claim 'impractical' Why not insist.
- Para 7.22 In the second line, the phrase in new development is repeated.
- East Herts Council supports approach to encouraging modal shift and making provision for electric charging points but thresholds need to be clarified/10% minimum provision
- Saffron Walden/ Stansted Neighbourhood Plan Steering Groups/Saffron Town Council support policy but request higher thresholds/20% for flats/min 7Kw
- The Thaxted Society support with greater number of charging points required

- Littlebury Parish Council request every new house/apartment have capability/substantial numbers in the public realm/existing settlements
- Essex County Council note flats provision too low/ need to future proof provisions in this policy
- Individuals support charging point provision/straightforward to put in new buildings/assist AQMA/use higher targets
- Developers request test of electric charging(a home charge point is £1400) /broadband via Whole Plan Viability Assessment/ensure do not threaten growth delivery

Policy TA4 – Vehicle Parking Standards

- Elsenham Parish Council concerned Residential Parking Standards document was last updated in February 2013 - two parking spaces for each three bedroom house inadequate
- Saffron Walden Town Council refer to as identified within the local Neighbourhood Plan
- Saffron Walden/ Neighbourhood Plan Steering Group Neighbourhood Plan Steering Group request referring to locally agreed standards/any such policy identified within the local Neighbourhood Plans
- Littlebury Parish Council - Garages should be of adequate size for modern cars, to maximise the use of off street parking.
- Little Easton Parish Council note policy should go further and support car parking initiatives away from new development that can be accommodated in balance with policy TA2.
- Elsenham Parish Council concerned Residential Parking Standards document was last updated in February 2013, and it is overdue for review.
- Thaxted Parish Council Comment: To add as identified within the local Neighbourhood Plans/Development Management should not allow discounting
- Essex County Council note Essex Vehicle Parking Standards have been updated in Essex Design Guide
- Developer supports policy subject to review of relevant parking standards when published
- Individuals want increased car parking capacity is needed for local people at railway hubs, including Stansted Airport, no new development without parking space for at least two vehicles

Policy TA5 – New Transport Infrastructure or Measures

- Highways England recognise that large parts of the district are rural/access for public transport difficult/SRN close to capacity with most concern over M11 J8 and Galleys Corner in Braintree/Careful planning to ensure growth in right place with facilities/steep change in public transport/GCs of size to internalise trips/coordinate timing of facilities and jobs
- Braintree support inclusion in policy of reference to Braintree Branch line
- Essex Bridleways Association request amend policy to Multi-user route improvements enhance multi-user connectivity with definitive Bridleway/No cycle links to Flitch Way

- Birchanger Parish Council concerns that any new development at Stebbing/Little Easton/Dunmow only exacerbate the situation/any new development at Junction 8 should be routed underground
- Saffron Walden Town Council request major revision/mention of the Cambridge to Haverhill Light Railway. Need new cycle paths/M11 new junctions north of Junctions 8/8A and improvements to Junction 9
- Saffron Walden Neighbourhood Plan Steering Group requests mention of B1383/Cambridge to Haverhill light railway/ new paths, e.g. Walden to Hinxton and Wimbish/a strategy to improve the M11
- Stansted Neighbourhood Plan Steering Group request mention of B1383/strategy to improve the M11 with air quality monitoring in Stansted Mountfitchet
- The Thaxted Society Support. However where Saffron Walden has problems with through traffic and its mitigation it follows, a priori, so does Thaxted.
- Littlebury Parish Council request garages should be of adequate size for modern cars, to maximise the use of off street parking.
- Little Easton Parish Council concerned over limitation of district council planning for large scale urban development/ flawed by the absence of binding commitments from delivery bodies
- Littlebury Parish Council requests plan set targets for traffic reduction, to reduce congestion and emissions, and take account of technology/change over to electric cars
- Developers; Support proposed transport measures in Saffron Walden/movement across town/need for Eastern Distributor Road/plan for future expansion/agree development must be supported by infrastructure, services and facilities/role of providers and Council
- Individuals; Spatial vision needs more than cooperation/actual investment, need relief roads to take traffic away from Saffron Walden centre, mention improvements impact on roads in and around Saffron Walden/Public Transport Provision/Walking and cycling improvements should be expanded where appropriate to include horse riding/Flich Way improvements/bridleway and the linking route will have bridleway status/ new junction on the M11 after Junction 8a to effectively give a bypass

Chapter 8 Infrastructure

Policy INF1 – Infrastructure Delivery

- 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 but 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

Policy INF2 – Protection and Provision of Open Space , Sports Facilities and Playing Pitches

- 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

Policy INF3 – Health Impact Assessments

- 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
- 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

Policy INF4 – High Quality Communications Infrastructure and Superfast Broadband

- 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
- 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,

Chapter 9 - Design

- Importance of design in adequate parking
- Wording of policies considered not 'woolly' and not assertive
- Policy wording considered 'unrealistic' as evidenced by West of Braintree Village plans
- No support for parking courts

Policy D1 High Quality Design

- The policy should refer to Secured by Design (SBD) and criteria for accreditation
- Silver Accreditation should be requisite minimum standard for street lighting
- The 'historic environment' should be used and not heritage assets as in text
- Developments should be designed to encourage healthy and active lifestyles
- Policy should reference Sport England's and Public Health England's 'Active Design' guidance
- Policy to specify garden sizes e.g. 50sq m. for 2 bed and 100sq m. for 3-bedhouses
- Nationally described space standards to apply to all new development
- Evidence is required to support implementation and adoption of internal space standards
- Considerations when imposing internal space standards:
 - Need – evidence on size and type of dwellings being built in UDC and consideration of impact on starter homes;
 - Viability – impact adopting standards to be part of viability assessment taking into account potential impact of larger buildings on land supply as well as affordability of larger homes

- Time – transitional period required to allow developers to factor in new policy on space standards
- Space standards requirement should be deleted as it is not evidenced
- “Good Design” criteria is highly subjective so it needs to be codified
- Policy D1 fails to make provision for the following criteria in Saved Policy GEN 2

Policy D2 – Car Parking Design

- Policy should include provision for cycle parking in residential developments
- Paragraph 9.8, second sentence to read to be amended to read, ‘If it is provided in the right place **or of sufficient quantity**, it is unlikely to be used properly’
- Omission of parking provision for bikes, motorbikes, buses or visitors, carer and delivery vehicles
- On-street parking only a design option where street widths are more than adequate
- Parking courts should be avoided
- Further discussion recommended by Essex County Council Environment, Sustainability and Highways to ensure consistency with the SUDs/Flood Risk Strategy with regards to permeable car parking courts
- Electric charging points should be provided within property curtilages

Policy D3 – Small Scale Development / Householder Extensions

- Policy should be amended to read *“Proposals for small scale development, including extensions to existing buildings, must be of a high standard of design, responding to or improving the site and surrounding area and not have a detrimental impact on flood risk”*.
- Requirement for a specific consideration of the historic environment within design policies
- Policy supported

Policy D4 – Development Frameworks and Codes

- Major developments required at minimum to provide a sports facility plan/strategy as part of green infrastructure plans
- Query on what constitutes ‘large development’ and ‘strategic development’
- Town and parish councils should be involved in strategic and major developments
Suggestion to amend paragraph 9.14 to read ‘Particular regard and consideration must be afforded to the delivery of local community or shopping centres and school provision. Early delivery of these facilities will ensure provisions for the 1st / 2nd cohort of residents’
- The policy should stipulate a trigger point for provision of facilities
- Building for Life 12 Assessments should apply to all developments of 50+houses not just new settlements
- An adopted Masterplan for Easton Park should be annexed to SP6 at the Regulation 19 consultation stage
- 4th bullet point in Policy D4 be amended to – *“A green infrastructure plan setting out the network and typology of green spaces, links, flood mitigation areas and areas of ecological importance”* (page 115).

- Wording of the 3rd paragraph in Policy D4 is amended to read –“*Development frameworks should be informed by best practice landscape and urban design principles. Applications.....”*
- The fifth bullet point (Policy text) should be amended to read ‘*A green infrastructure plan setting out the network and typology of green spaces, links and areas of ecological importance and opportunities for the creation of sustainable drainage schemes including attenuation ponds/ infiltration basins and swales.*’
- Policy should include reference to the historic environment
- The West of Braintree Garden Community development approach merits a separate section in the policy which can be built on in a site specific DPD
- Detailed code should be specified
- Policy is supported on condition that enforcement will be proactive and effective
- Equestrians should be mentioned and included in Policy D4
- Definition of “strategic” needs clarification to ensure that Plan is effective
- Requirement of Development Frameworks is regarded as an additional phase in the planning decision making process and is unjustified, not effective and not supported by national policy
- The policy considered overly onerous and does not specify when the policy will be applied
- Not clear whether the policy refers specifically to Garden Communities and strategic sites allocated through the Local Plan
- Area Design Codes are considered more appropriate for a 10,000 unit Garden Community at Easton Park to be built over 20 years
- Clarification is required on whether Policy D4 expects outline or reserved matters submissions to be accompanied by the Building for Life Assessment
- Unclear whether framework is to be adopted as SPD or approved by the Council as guidance. SPD adoption will add to delivery timetable and cause delay
- Proposed rewording of Paragraph 9.10, “*Proposals for strategic development sites (500+ dwellings or 50,000 sq. m) large scale development, including the new garden communities, major and strategic development sites, should be informed by a masterplan that comprises part of a development framework for the site. This should place the site in its wider context and avoid narrowly looking at landownership boundaries.*”
- UDC should develop its own Design Code, consult on it and ensure rigorous compliance once adopted
- Design codes can provide greater certainty and control over design quality in long term
- Design code to cover, building heights, depths and widths, street typologies, landscape treatments as well as façade treatments
- New large settlements (estates) are not appropriate for the district
- Large settlements are artificial and ignore historic structure of area

Policy D5 – Design Review

- The size and complexity of West of Braintree development requires a site specific solution and policy may be too restrictive
- All major development should be subject to a Design Review
- All major schemes should not be subject to a Design Review

- Design should be in accordance with an adopted Neighbourhood Plan requirements as well as complementing the area
- Local Town and Parish Councils should be consulted and included in discussions on design
 - Where a Neighbourhood Plan adopts a design guide as part of its Heritage and Character Assessment, this should be used.
- Application of the Essex Design Guide to new settlements regarded as inappropriate as development should reflect the age they being are planned
- All projects should be subject to design review regardless of size or being “in important and/or sensitive” locations
- Clarification required on whether “emerging schemes” refers to emerging reserved matters submissions
- Referral of all strategic and major developments is not proportionate
- Requirement for a design review assessment is too onerous, restrictive and the Policy encourage and not require
- Policy D5 needs to clarify a development threshold to trigger the Design Review process
- Policy D5 has the potential to frustrate delivery by using a Design Review Panel operated by Shape East
- Suggested rewording of Policy “*Where necessary the Council will require emerging schemes for the new garden communities, strategic and major development sites to be assessed through design review. Equally, smaller sites in important and or sensitive locations will also be subject to design review. The Council may seek to refer schemes to the East of England Design Review Panel operated by Shape East an independent review panel where it may be helpful in reaching an appropriate design solution. The Council encourages design review to take place early in the process to allow scope for input into the emerging design. The final scheme submitted to the Council should include a report on the design review process and how the scheme has responded to this.*

Policy D6 – Innovation and Variety

- Avoidance off-the –shelf house designs is supported
- Delete last sentence as considered unenforceable and unmanageable
- Query on how and who will judge the design competitions
- New houses should complement the local area

Policy D7 – Design for Self and Custom-build Homes

- Larger sites to provide 5% of self-build land
- Suggested that all sites of 150 or more homes should provide 5% self-build land
- Designs should be in accordance with specific requirements in Neighbourhood Plans
- Queries on how self-build will be identified, how those registered will be notified, and how appropriateness of design will be determined
- Plot passports should include all matters and not leave it to plot owner to decide
- Flexibility should be adopted to allow self-build beyond development limits
- Small plots of land outside villages and conservation areas should be available for development

- Hamlets should be allowed to expand rather than barn conversions that are not in keeping with surrounding housing style

Policy D8 – Sustainable Design and Construction

- Wording of the 4th paragraph of Policy D8 be amended to read, *“Waste, recycling and storage areas should be provided. Equally, a system that reduces water consumption and allow for the reuse of grey water is encouraged. Development should not increase flood risk on or off site.”* (page 118).
- Policy wording seen as unambitious and too loose
- Policy should be amended to include waste access
- Green roofs should be encouraged
- Policy needs to be more specific on provision of waste areas for flats.
- Policy needs clarification as it might be misinterpreted as applying to all developments of all scales
- The policy makes no specific reference to the historic environment or to visual impact and setting
- Policy D8 is not in line with PPG and Ministerial Statement of July 2015 stating that improvements in technical build standards are to be delivered through Building Regulations
- Use of BREEAM Standards and Home Quality Mark is an unnecessary financial burden on developers
- Both BREEAM standards and Home Quality Mark have not undergone a formal public consultation and UDC should not allow the Building Research Establishment Ltd. to dominate assessment of Sustainable Design and Construction
- New builds should exceed BREEAM standards and current Building Regulations

Policy D9 – Minimising Carbon Dioxide Emissions

- Phrases such as “allow latitude” and “subject to viability” perceived as weak and undermining UDC’s stance on climate change
- Query on location of Planning Practice Guidance
- The paragraph (9.26) is considered a lack of massive support for energy reduction measures
- No specific reference to historic environment or visual impact and setting
- Historic England invites a specific policy relating to inclusion of renewable technologies in Conservation Areas with regard to historic buildings and wider historic landscape
- Proposed 30% improvements on Building Regulations is too high
- Policy D9’s Energy Requirement places rigid expectation on all development and may make schemes unviable
- Policy sets requirement beyond scope of national technical standards for energy efficiency
- Policy D9 is not consistent with National Policy and guidance and should be deleted
- Policy D9 first sentence should be amended to read, *“Development proposals for both commercial and residential buildings should demonstrate that they have applied the Energy Hierarchy, as set out in the Local Plan and, in doing so, have achieved a Dwelling Emission Rate (DER) which is 30% 10% lower than the Target Emission Rate (TER) required by Building Regulations Part L 2013 Edition.”*

- 30% lower than TER considered a very a very weak target. A wealthy, well-resourced district like Uttlesford should be taking a far stronger lead!
- The get out clauses here: 'as far as practical,' 'where it is feasible', and worse of all, 'economic' mean: let's get it cheap now – let future generations pay.... These phrases should be removed.
- PASSIV houses should be given priority

Policy D10 – Highly Energy Efficient Buildings

- Extent to which planning system has in delivery of additional technical building standards is clarified in Ministerial Statement (July 2015) and PPG paras 56-001 – 56-023
- Energy demands and carbon dioxide emissions are required to accord with Part L of the Building Regulations
- Standards for energy efficient buildings considered low
- All new housing should be built with solar panels
- PASSIV housing standard should apply to all social housing delivered by the Local Plan
- All new housing stock should include SMART and green technologies especially superfast or subsequent generations broad band

Chapter 10 – Environment

- Concern raised over lack of environmental assessments on site allocations
- No assessments of effects on historic environment attributable to additional traffic from developments
- Local Plan has to commit to provision of substantial green spaces in proposed Garden Communities
- Failure to implement adequate sustainable travel infrastructure whilst developing east of Saffron Walden will exacerbate already illegal pollution levels of the Saffron Walden AQMA.
- New development contributes to loss of habitats and small green spaces do not mitigate large scale development
- Population increase will mean more carbon emissions from additional traffic
- Light pollution in a 'dark area'
- Much of the evidence remains the same as at 2015
- Specific Brief Heritage Impact Assessments (HIA) considered insufficient
- Full HIAs recommended for each of the three Garden Communities
- All potential sites need to be appraised against historic impacts
- Policy concern with renewable energy is why make specific provisions when out of date 2008 evidence identified a gap in provision and not obstructions to installation
- No need to include problematic provisions for renewable energy in policy

Policy EN1 – Protecting the Historic Environment

- Policy specifically addressing Heritage at Risk is welcome
- Strengthen policy by outlining proactive approach to addressing Heritage at Risk

- Policy should be consistent with NPPF wording and legislation and should not contradict, add to or take away from NPPF or Legislation
- The term historic environment should be used instead of heritage assets
- Historic landscape characterisation should be included in the Plan
- No policy on shopfronts in either Design or Environment Chapters
- Recommendation to reference Neighbourhood Plans where appropriate
- Policy EN1 regarded as contradictory to SP6 (Easton Park Garden Community) as EN1 principles cannot be demonstrate in proposed development
- North Uttlesford Garden Community (NUGC) does not protect or enhance the significance of heritage assets both on-site and in Great Chesterford.
- Policy regarded as ambiguous and not providing sufficient protection to historic assets
- All heritage assets should be safeguarded
- Development at West of Braintree Garden Community (WoBGC) contradicts Government policy on ancient woodlands and urges consideration of viable alternative sites
- New towns should be sited near major employment opportunities and not as in the case of UDC proposals

Policy EN2 – Design of Development within Conservation Areas

- Word 'essential' should be deleted as it implies less stringent test than by obligatory consideration in statutory provisions
- Character and appearance of conservative area should be considered whether it is essential or not
- Remove the word 'overall' in Bullet Point 3
- Historic England would welcome the provision of any future designation of conservation areas within Uttlesford
- Village Design Statements regarded as vital to the preservation of important characteristics and historic significance of villages
- Non-consideration of outline planning applications in conservation areas supported
- What constitutes substantial pollution?
 - Policy EN2 not in conformity with NPPF guidance para 132-134 because NPPF states that if harm is deemed substantial then the proposal needs to achieve substantial benefits to outweigh that harm.
- Paras 132-134 relate specifically to designated heritage assets i.e. the more important the asset the more weight attached to it
- Policy to be amended to reflect guidance

Policy EN3 - Protecting the Significance of Conservation Areas

- Policy supported
- Developments resulting in increased traffic and pollution within Conservation areas will not be permitted
- Policy conflicts with SP6 (Easton Park) as it does not conserve or enhance the character of the conservation area
- NUGC will be damaging to the character, appearance and significance of the Conservation Area within Great Chesterford.
- UDC not proactive in countryside preservation enforcement

- EN3 contrary to NPPF advice which requires balancing exercise between harm to asset and public benefits.
- Detrimental effect of increased air traffic at Stansted Airport on setting of conservation areas to be taken into account
- This policy considered to require more detail or an SPD

Policy EN4 - Development affecting Listed Buildings

- Policy appears to prioritise renewable energy provision over protection and enhancement of historic environment
- As drafted policy seeks to apply less stringent test contrary to NPPF paragraph 132
- Policy currently conflicts with NPPF in affording greater weight to the provision of renewable energy equipment
- Delete entire Policy paragraph 3 and associated bullets points
- Should locally listed buildings be referenced in conservation area appraisals?
- Proposals for works on locally listed buildings to be accompanied by structural surveys if not referenced in conservation area appraisals
- Should be case-by-case examination of applications supported by meaningful enforcement
- UDC regarded as lax and slow in enforcement in countryside as evidenced by damage to hedgerows, and at 'risk buildings'
- An embargo on development based on visual impact on an asset is contrary to NPPF guidance
- Policy should be amended to reflect NPPF guidance
- Paragraph is considered misleading to readers
- Wording to be amended to align with NPPF para 128 regarding significance and not reasons for listing
- An embargo on development based on visual impact on an asset is contrary to NPPF guidance
- More information required for a listed building application than indicated in para 10.14
- Policy criteria contradicts statutory obligations as it does not ensure preservation of a building's special interest
- Support for sympathetic treatment of applications seeking restoration to reveal significance of heritage asset

Policy EN5 - Scheduled Monuments and Sites of Archaeological Importance

- Policy title should be changed to Archaeology
- Seeking preservation in situ could be strengthened if supporting text elaborates how this could be achieved
- No terms of reference provided to what would constitute a need that would outweigh the importance of an asset
- Significance of a designated asset should be given greater weight to that asset's conservation (NPPF paragraph 132)
- Draft policy does not accord with NPPF paragraphs 132-135
- Application of NPPF paragraphs 131-135 test on identification of harm

- Objective of first paragraph not clear and could be interpreted to say that even if preservation in situ was possible it would not be necessary if development is considered to outweigh importance of the asset
- Second paragraph, Heritage England object on the basis that NPPF paragraph 128 requires applicants to provide a description of any heritage assets affected including contribution made by the asset
- Paragraph 4 wording, does not indicate requirement for actual excavation, investigation and recording but only a provision to be made
- No reasoned justification for inclusion of a renewable energy provision regarding scheduled monuments and sites of archaeological importance.
- Objection to prioritisation of renewable energy provision over protection and enhancement of the historic environment by seeking to apply a less stringent test.
- Heritage England requests removal of entire fourth paragraph and its associated bullet points from the policy.
- Policy as currently drafted fails to secure conservation of scheduled monuments
- West of Braintree Garden Community will significantly affect Andrewsfield
- Impact NUGV would not meet the Policy criterion of impact being reversible
- Historic Environment Assessment for Great Chesterford and Little Chesterford (July 2016) identifies topography as making major positive contribution to setting of Heritage assets
- SA Environment Report (July 2017) acknowledges that it is not known whether mitigation could be achieved

Policy EN6 Historic Parks and Gardens

- Correct Register title to Register of Parks and Gardens of Special Historic Interest
- Delete third sentence as it appears to imply a distinction in considerations between Audley End and Bridge End gardens from other sites of national importance albeit not Grade 11* listed.
- Essex Garden Trust's Historic Designed Landscapes of Essex: Handbook Part 3 constitutes a local list
- Applications to be accompanied by a statement of significance and assessment of proposed development's impact on significance
- Issue is not reasons for designation but asset's significance
- Amend to read Historic England and not English Heritage
- Proposed addition to text, "...in identification of the significance of the asset and the need to explain the impact of the proposals on the significance of the asset in a Historic Impact Assessment."
- Policy should refer to settings of historic parks and gardens
- Impacts to views to be added to list in policy
- No development should be permitted
- Development integral to function of park to be permitted subject to planning conditions
- Historic Parks and Gardens are subject to the same NPPF considerations as listed buildings, conservation areas and scheduled monuments
- Historic England concerned about reference to 'material harm'
- Ancient and veteran trees to be afforded highest protection and to be lost to development in exceptional circumstances

- Policy should not place any embargo on all development causing an impact but should undertake a balancing exercise on harm and benefits

Policy EN7 – Non-designated Heritage Assets of Local Importance

- Policy considered clear and accords with NPPF guidance
- Separate policy for non-designated heritage assets is welcome
- Stronger policies and enforcement action on countryside preservation and buildings at risk required from UDC
- Query on location of Local List of Heritage Assets in Local Plan Document
- Delete sentence re- paragraph 10.22 as UDC cannot be identify new heritage assets on an ad hoc basis
- Policy supported

Policy EN8- Natural Environment

- Incorrect cross-reference to NE1 instead of EN9
- An SPD and clearer forms required
- Policy and paragraph 10.24 supporting text fail to demonstrate a distinction between hierarchy of sites as required by NPPF paragraph 113 therefore policy is **unsound** as drafted as not in accordance with NPPF paragraph 113
- More detail required on how UDC intends to, “optimise conditions for wildlife and habitats to improve biodiversity and tackle habitat loss and fragmentation
- Easton Park development cannot demonstrate EN8 principles
- S106 contributions should be used to promote woodland cover, extend and create new meadows
- The proposed Flitch Way Local Nature Reserve should be mentioned and supported in the Local Plan
- Visitor pressure on Hatfield Forest should be acknowledged as well as the impact of population and visitor growth from cumulative developments

Policy EN9 – Protecting the Natural Environment

- The Local Plan should acknowledge existing problems and additional pressures on Hatfield Forest arising from housing developments
- Requirement of a policy required in Local Plan to protect Hatfield Forest
- Reference to Hatfield Forest in Chapter 3 of the Local Plan should be with regards to protection of the environment and not about promoting growth.
- Paragraph 3.31 should be amended by removing Hatfield Forest from 3rd and moving it to the 4th bullet point.
- Query on whether Local Geological Sites (LoGS) are shown as Geological Sites on Policies Map Key
- Environmental protection of Boxted Wood will be impossible with the proposed development of West of Braintree Garden Community
- Paragraph 10.29 wording would be more effective if included in Policy EN8 wording
- Paragraph 10.29 objective is not included in Policy EN9
- Sites such as Hatfield Forest and Aubrey Buxton are under threat because of failure by new development to provide enough amenity space for local need

- Policy should reference the creation of additional parks and sites as currently it is about protecting existing sites rather than creation of new space.
- Automatic refusal of planning permission due to a reduction in biodiversity and geodiversity value is not an approach in accordance with NPPF guidance
- Paragraph 3 of concern as it allows significant harm to biodiversity and geodiversity
- Requirement of a biosecurity protocol method statement is recommended

Policy EN10 – Traditional Open Spaces and Trees

- Definition of traditional open space which policy seeks to protect is not provided
- Designation of open space to be based on a robust comprehensive evidence base that clearly sets out value of space and reasons for its protection
- Policy needs redrafting to refer to planning balance exercise where only when harm significantly and demonstrably outweighs the benefits will a proposal be refused
- Policy should be more flexible
- Policy to state historic role or importance in townscape open space
- Development sites required to undertake Arboriculture Surveys and Arboriculture Impact Assessments
- Policy insufficient as it should seek to increase traditional open space, trees
- Policy should include creation of new spaces
- Tree survey to accompany planning applications
- Hedgerows to be included in policy
- Policy appears to imply that need for development outweighs amenity value
- Requirement to provide definition of amenity value

Policy EN11 – Minimising Flood Risk

- Supporting text not consistent with national policy on Guidance for Flood Risk and Coastal Change
- Recommended paragraph amendments provided
- Text to reflect that Essex County Council Environment, Sustainability and Highways is the s Lead Local Flood Authority and statutory consultee for surface water flood management
- Most up-to-date references should be used and appropriately referenced
- Flooding will continue to be a problem
- Funding mechanisms (e.g. S106 agreements) should be included
- Recommendation to further consider whether surface water flooding is a risk in the district
- No development should be permitted in Flood Zone 3
- Recommendation to amend paragraph 10.34 as follows: *“All development should be located in areas at low risk of all forms of flooding. The main risk in the District is from river or fluvial flooding. Development in certain locations can cause flood risk elsewhere as a result of increased runoff. Surface water run-off from new development should be controlled as near to the source as possible and ideally within the boundary of the development. Just over 96% of the District lies within Flood Zone 1 where there is a low probability of fluvial and tidal flooding. The scale of development required in the Local Plan period can be provided on land which is at the lowest risk of fluvial and tidal flooding and all new built development is expected to be located in this zone. When*

locating development and placing development within a site, all forms of flooding should be considered. The sequential test will be used to ensure new development takes place in the areas with the lowest probability of all forms of flooding and, where necessary, the exception test will be used. Full details of the sequential and exception tests are set out in the National Planning Practice Guidance” (paragraph 10.34, page 132).”

- Recommendation to amend paragraph 10.34 as follows: “A site-specific flood risk assessment will be required for new development sites in accordance with the Environment Agency’s Standing Advice. All major development should include a drainage strategy which should be submitted for review for the Lead Local Flood Authority which is in line with their requirements. The Council will work with developers, the Environment Agency and the Lead Local Flood Authority to achieve sustainable local flood mitigation measures as part of development. Any residual risk should be able to be safely managed with safe access and escape routes where required and access by emergency services”.
- Supporting text quoted references are not the most up to date and reference should be made to the most up-to-date surface water risk map available namely the Environment Agency’s Risk Surface Water Flooding Maps
- Policy should include funding mechanisms such as S106 Agreements towards the stated goal of managing residual flood risks resulting from developments
- Contrary to paragraph 10.35 a site-specific flood risk assessment is not directly required under the Environment Agency’s Standing Advice but is a requirement of NPPF,NPPG: Flood Risk and Coastal Change

Policy EN12 – Surface Water Flooding

- Paragraph 10.39 should be amended to refer to Essex SuDs Design Guide instead of SuDs guidance
- Exclusion of car parks and hard standings from incorporation of SuDs queried
- Run-off rates should be greenfield sites restricted to 1 in 1 greenfield rate and brownfield sites to be restricted to greenfield rate and where non-viability is demonstrated then a minimum 50% betterment on existing run-off rates should be sought
- Query basis of UDC’s information on an increase in water pollution associated with SuDs because SuDs do not increase pollution
- Last policy paragraph should refer to long-term maintenance of SuDs systems as well as bird hazard management plan
- Inadequacies in the policy such as exclusion of car parks from the requirement to incorporate SuDs.
- SuDs is likely to reduce risk of flooding to Great Chesterford but the SA Environment Report (July 2017) recognises development likely to be constrained by mitigation measures

Policy EN13 – Protection of Water Resources

- Recommended to reconsider some of the policy provisions set out in Policy EN13
- Addition of ‘.....the amenities of existing local residents’ to fourth paragraph
- Essex SuDs Design Guide and successor documents to inform emerging policy

- policy as the comprehensive coverage and wording of policy complements Environment Agency's internal water resources policy
- Support for water efficiency target of 110/litres /person/day within the policy
- Building Regulations 2010 require consumption of occupiers of new homes not to exceed 125/litres /person/day and this should be addressed through the Building Regulations
- Additional requirements need to be fully evidenced
- Unclear whether costs of the requirement for this infrastructure and impact on development viability have been assessed
- What plans have been made to ensure enough water for the new developments since East Anglia has the lowest amount of rainfall in the UK?
- NUGV located within groundwater protection zone and a risk based approach required to demonstrate that NUGV is protective of groundwater from potential contaminating activities
- Have the responsible water companies factored additional investment into their Asset Management Planning (AMP) process?

Policy EN14 – Minerals Safeguarding

- Policy considered as duplication of policy adopted Essex Minerals Local Plan 2014 and needs modification to clarify relationship
- Amendment sought in second paragraph specifying Consultation with Essex County Council as the Minerals Planning Authority
- Policy considered too onerous and not in accordance with NPPF paragraph 143
- Blanket policy seeking refusal of permission where minerals will be sterilised is contrary to guidance as Local Planning Authorities should encourage prior extraction of minerals where practicable and feasible

Environmental Protection (Paragraph 10.47)

- No provision of credible strategy for tackling air pollution and traffic congestion in Saffron Walden
- UDC not taking into account cumulative effects of new development
- Saffron Walden cannot sustain the level of development without serious infrastructure improvements

Policy EN15 – Pollutants

- Recommendation to reconsider some of the policy provisions as well as Essex SuDs Design Guide and successor documents
- Attention to be paid to schools and hospitals in proximity airport due to additional air and road traffic generated by Stansted Airport
- Compensation to listed buildings of significant heritage importance to facilitate repairs caused by increased pollution and air traffic vibration
- Noise assessments should be undertaken on a 24-hr basis so as to assess cumulative impacts on directly affected towns and villages
- Suggestion to add 'Any pollutants used or stored on site during construction of the development must be removed following completion of the development. Any such storage area must subsequently be verified as fit for public use and be accompanied by a test and inspection report to that effect.'

- Mitigation maybe required for individual properties e.g. occupants of Church St., Museum St. and George St. receiving grant payments for cleaning or maintenance

Policy EN16 – Air Quality

- How can it be pollution attributed to new development be measured and mitigated?
- Objection to policy as it does not include provision for measurement or mitigation as well as not mentioning the impact of new development
- Objective of plan should be minimisation of traffic movements and development of non-fossil fuel transport
- M11 and A120 should both have 100-metre width zones
- Urgent need to tackle poor air quality in Saffron Walden town centre
- Construction of a partial or full relief road would remove HGVs and other traffic from the town centre
- Query on how, when and by whom will air quality be assessed and also will monitoring be ongoing?
- Need to recognise importance and role in removal of certain pollutants when planted in the right locations
- Query of existence of past emission reports
- UDC Air Quality Action Plan does not contain any measurable mitigation actions nor does it set a target date for lifting the Air Quality Management Area
 - No account being taken of cumulative effect on air quality despite explicit instructions from DEFRA
- “Phrases such as ‘reasonable and proportionate’ render policy utterly ineffective”
- All allocated sites except two will generate traffic through town thereby exacerbating the problem

Policy EN17 – Contaminated Land

- Stronger policies and enforcement required from UDC

Policy 18 – Noise Sensitive Development

- Policy EN18 in conflict with SP6 due Easton Park being affected by noise pollution from nearby Stansted Airport
- Proposed Stansted Airport expansion to 44.5mppa will worsen the pollution
- Recommended addition to policy “All activity should comply with BS5228:2009 Code of Practice for noise and vibration control on construction and open sites.”
- EN18 not in accordance with NPPF paragraph 109 which refers to unacceptable adverse noise and not adverse levels of noise as stated in UDC policy
- West Of Braintree Garden Community will be subjected to maximum noise and air pollution due being located under the eastbound flight path of aircraft departing Stansted Airport

Policy 19 – Light Pollution

- Requirement to specify criteria on design
- Street lamp design an important element of street furniture
- Concern over urbanisation effect of light pollution on villages
- Policy is in conflict with SP6 due to proximity of Easton Park to High Wood SSSI

- Boxted Wood “one of the darkest areas in the district” will be destroyed by the local plan
- NUGV proposal does not address adverse impact on the landscape and surrounding communities of light pollution from a highly visible development

Chapter 11 – Countryside

- Development depleting the countryside as well as destroying the natural habits and demolition of historic buildings.

Policy C1 – Protection of Landscape Character

- Policy considered as not seeking landscape enhancement
- Recommendation to change wording from “material harm”
- NUGC regarded as in conflict With Policy C1 principles regarding settlement pattern, scale, density and cross views
- Careful lighting installations in public and private developments to reduce visual impact in rural areas
- Policy supported for protection of panoramic views
- Thaxted’s historic character believed to be under threat from increasing levels of development especially, inappropriate design and lack of enforcement
- Policy considered not contrary to NPPF principles (paragraph 14)
- Policy considered overly restrictive and fails to recognise positive improvements and mitigations that development can provide

Policy C2 – Re-use of Rural Buildings

- Policy welcomed by Historic England as it will protect heritage assets or enhance the countryside
- Policy offers opportunity to identify a potential role for re-use of agricultural in supporting rural economy
- Use of Dutch Barn footprints for dwellings should be avoided
- Construction of agricultural buildings as a pretext to provide a future dwelling footprints should be avoided
- Delete last Policy Bullet point as is heading of next paragraph and Policy C3 title

Policy C3 - Change of Use of Agricultural Land to Domestic Garden

- Permitted rights should not be included
- Proposed Garden Communities do not meet Policy C3 criteria
- Proposed garden Communities will change the character and appearance of the countryside
- Policy rewording require to ensure that domestic gardens cannot be used for house building
- Policy may give rise to domestic infill in form of annexes on originally designated agricultural land

Policy C4 – New Community Facilities within the Countryside

- Reference to be made to Essex Rural Strategy 2016-2020 (RCCE 2016) and successor documents published by Essex Rural Partnership to help promote vibrant, mixed and sustainable rural communities
- Suggestion to add ‘indoor and outdoor sports facilities’ to the list in paragraph.
- Recognition that in principle outdoor sports facilities may be justified in the countryside beyond development limits is welcome
- Outdoor sports facilities requiring access to natural resources may not be met in urban areas due to land take and locational requirements
- Community facilities and other built amenities should not be permitted beyond development limits except in exceptional circumstances
- Policy as drafted make no provision for expansion or improvement of community facilities in the countryside
- Flexibility required to meet community needs
- Policy to be amended to require a Landscape Assessment on application

Chapter 12 – Residential allocations

No overarching summary

Chapter 13 – Non-residential allocations

No overarching summary

Chapter 14 – Delivery and Monitoring

- Monitoring proposals welcomed but concern that thresholds are inadequate or delivery requirements omitted altogether e.g. green space, sports provision and affordable housing.
- Monitoring should be completed annually, rather than waiting until the end of the plan period.
- Concern over the capacity of UDC to monitor development.
- Concern that the existing Plan has been ignored by UDC so monitoring should be central to the Plan.
- Concern that the impact of development on residents should be minimised.
- The default assumption should be that consultation with residents and parish councils is vital e.g. implementation of housing schemes.
- There should be a provision whereby applications will not be considered from developers who have been found to be inadequate in the past.

Chapter 15 - Glossary

No representations

Chapter 16

Appendix 1 – Replacement Policies

No representations

Chapter 17

Appendix 2 – Monitoring Framework

- 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.

Chapter 18

Appendix 3 – Housing Trajectory

- 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.

Chapter 19

Appendix 4 – Garden community principles

- 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.

Chapter 20

Appendix 5 – Marketing Assessment Information

- 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

Chapter 21

Appendix 6 – Existing Employment Sites Schedule

- 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.