

# Strategic Land Availability Assessment (SLAA) Methodology

November 2022

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# **Revision history**

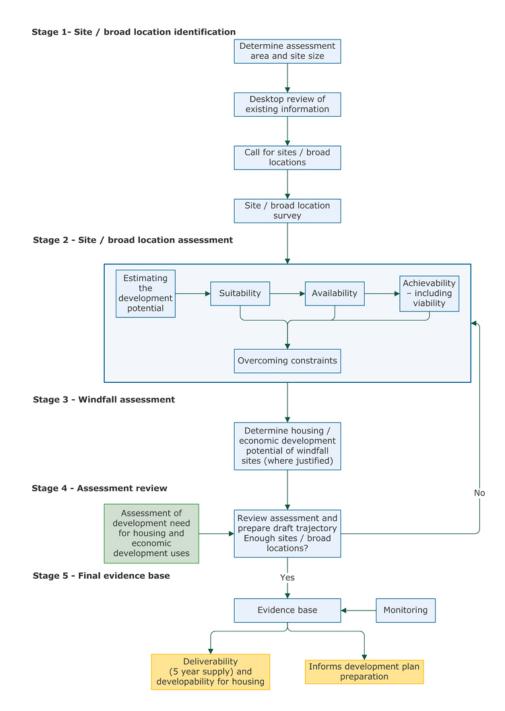
Revision	Revision date	Details
1	29 April 2021	Local Plan Leadership Group (29 April 2021)
2	31st October 2022	Changes and further detail to support commencement of site assessments following the comments received through the SLAA Technical Consultation

#### 1. INTRODUCTION

- 1.1 The purpose of the Strategic Land Availability Assessment (SLAA) is to identify a future potential supply of land which is suitable, available and achievable for housing and economic development uses over the plan period.
- 1.2 The assessment does not in itself determine whether a site should be allocated for development. It is important to appreciate that this is <u>not</u> the selection of sites for allocation, which will come later and involve a deeper consideration of a range of factors, but to identify which sites are and are not available for potential allocation.
- 1.3 The decisions regarding which sites will be proposed for allocation will be made in the emerging Uttlesford Local Plan (and neighbourhood plans) which will be subject to full public consultation and examination before any site or plan is adopted. (In the case of the Uttlesford Local Plan the District Council's provisional choices of allocations will be published in the Consultation Draft Local Plan in Summer 2023.)
- 1.4 The role of the SLAA is to provide information on the range of sites which are available to meet the local authority's requirements and to inform plan-making and decision-taking, including:
- Gaining an understanding of the land available for future residential or employment development
- Enabling the Council make informed decisions of where to allocate future development;
   and
- Informing housing and employment trajectories, including specific deliverable sites for years 1-5 of the plan period, and specific deliverable sites or broad locations for growth for periods 6-10 and 11-15 of the plan.
- 1.5 The National Planning Policy Framework (NPPF) describes how planning authorities should build a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment<sup>1</sup>. Detailed guidance is set out in the Planning Practice Guidance (PPG), which clarifies that the process applies to economic land in addition to housing land. In issuing its call for sites, the Council made it clear that sites are sought for the full range of uses including 'green sites' which may have benefits in terms of accessible open space, biodiversity gains and/or carbon absorption.
- 1.6 The land availability assessment methodology set out in the PPG is summarised in the flowchart reproduced below.

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<sup>&</sup>lt;sup>1</sup> NPPF (2021) paragraph 68



- 1.7 This document describes the Council's methodology, which is structured according to the guidance in the PPG.
- 1.8 As explained in the NPPF, the SLAA does not in itself determine whether a site should be allocated for development. It is the role of the SLAA to provide information on the range of sites which are available to meet the local authority's requirements, but it is for the development plan to determine which of those sites are the most suitable to meet those requirements. A separate topic paper will bring together the SLAA, Sustainability Appraisal and other evidence and set out why sites are included or excluded in the draft Local Plan.

#### Stakeholders

- 1.9 The SLAA will be carried out with the involvement of a wide range of stakeholders, and in accordance with the statutory duty to cooperate<sup>2</sup>. The stakeholders will include but not necessarily be limited to the following:
- Environment Agency
- Historic England
- Natural England
- Civil Aviation Authority
- Homes England
- Clinical Commissioning Group
- NHS Commissioning Board
- Office of Rail Regulation
- Integrated Transport Authority
- Highway authority
- Local Enterprise Partnerships
- Local planning authorities in the housing market area
- Local planning authorities in the functional economic market area
- Landowners and promoters
- Local property agents
- Developers
- Local communities
- Businesses and their local representative organisations
- Parish and town councils
- Neighbourhood forums preparing neighbourhood plans
- 1.10 All stakeholders will be invited to comment on the final SLAA, which will be published alongside the Draft Local Plan (Regulation 18) consultation in Summer 2023.

#### SLAA Technical Consultation Overview

- 1.11 The SLAA Technical Consultation was undertaken as an optional consultation (i.e. not required by Government regulations), the reasons for the technical consultation are set out below. The consultation took place between 18 October 2021 and 29 November 2021. The invitation to participate and consultation brief is shown in Appendix C.
- 1.12 The objectives of the SLAA Technical Consultation were:
  - To review the plotted site boundaries
  - To fact-check the key attributes of the sites detailed in the Site Proformas, resulting from our desktop analysis.
- 1.13 Parish and Town Councils and site owners/promoters were consulted in this SLAA Technical Consultation. They were asked to fact check sites included in our Site Proforma (151021). Sites are coded by Parish and suffix, according to proposed use:
  - Residential (RES)

<sup>&</sup>lt;sup>2</sup> As set out in The Town and Country Planning (Local Planning) (England) Regulations 2012

- Employment (EMP)
- Community (COM)
- Mixed use (MIX)
- Other (OTH)
- 1.14 The email inviting participation in the SLAA Technical Consultation stated that the consultation was not an opportunity to make general comments on the suitability of a site or the SLAA Methodology, it was not a consultation with set questions. However, we received many informative comments regarding the SLAA Methodology and how the different ratings and assessment will be used.
- 1.15 Over a 100 responses were received. This included response from 28 out of 60 Parish/Town Councils (8 parishes had no sites submitted through the Call for Sites).
- 1.16 Comments were received on both factual information in relation to the sites and the SLAA Methodology on a variety of themes. The comments are not a comprehensive list of all the detailed points received, however the aim is to summarise how point have been considered as part of the development of the Final SLAA Methodology.
- 1.17 We have responded to these and provided a commentary as to how these have been taken into account in the SLAA and plan making process, this can be found in Appendix D

# <u>Please note any site-specific comments, where factual, will inform the assessment of the sites.</u>

- 1.18 The Site Proformas dated 15.10.21 detailed 314 sites that came forward though the Call for Sites (2021) can be found <a href="https://example.com/here.">here.</a> They were prepared as part of a desk top exercise utilising a wide range of spatial data, by AECOM<sup>3</sup>. The analysis utilises Geographic Information System (GIS) mapping which draws on data from multiple sources. The Site Proformas were intended to give a high-level review of each site according to various constraint and opportunity features, reflecting different themes including:
  - Accessibility
  - Communities
  - Health and wellbeing
  - Transport, air quality & noise
  - Climate change and adaptation
  - Land and water resources
  - Landscape
  - Historic environment
  - Biodiversity and geodiversity
- 1.19 The journey time analysis in the Accessibility section, is a quantitative analysis which utilises Basemap's TRACC software, which calculates journey times including walking, cycling and public transport. It is intended to give a 'high level' indication of accessibility using sustainable travel and existing infrastructure. It indicates areas that are not currently

<sup>&</sup>lt;sup>3</sup> AECOM – the consultants commissioned to conduct the Sustainability Appraisal of Uttlesford's Local Plan

accessible, those that are highly accessible, and those areas in between. They do not necessarily reflect that there is a safe walking or cycling route at present and mitigation measures may be required in some locations. The TRACC Accessibility Analysis map and Technical Note can be seen <a href="here">here</a>.

1.20 The information on the Site Proformas is collated from a complex set of different data sources and assumptions for 'RAG' rules related to different features or criteria are outlined in the GIS Analysis Methodology (151021).

# 2. STRATEGIC LAND AVAILABILITY ASSESSMENT METHODOLOGY

# Stage 1 – Site / broad location identification

#### Assessment area and site size

- 2.1 The area selected for assessment is the plan-making area the district of Uttlesford.
- 2.2 The site size thresholds are as follows:
- 0.2 hectares (or 5 dwellings) for housing sites.
- 0.25 hectares (or 500m² floorspace) for employment sites.
- Other development no threshold
- 2.3 Unless otherwise stated, references to 'sites' should be taken to include broad locations which may be identified.

# Identifying sites

2.4 Sites will be identified from a wide range of sources, starting with the desktop review outlined in the below table.

Type of site	Potential data source
Existing housing and economic development allocations and site development briefs not yet with planning permission  Planning permissions for housing and economic development that are unimplemented or under construction	Local and neighbourhood plans Planning applications records Development Briefs Planning application records Development starts and completions records
Planning applications that have been refused or withdrawn	Planning application records
Surplus and likely to become surplus public sector land	Local authority records  National register of public sector land Engagement with strategic plans of other public sector bodies such as county councils, central government, National Health Service, police, fire services, utilities services, statutory undertakers
Sites with permission in principle, and identified brownfield land	Brownfield land registers (parts 1 and 2) National Land Use Database Valuation Office database Active engagement with sector
Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes, e.g. offices to residential)	Local authority empty property register English Housing Survey National Land Use Database Commercial property databases (e.g. estate agents and property agents) Valuation Office database Active engagement with sector

	Brownfield land registers
Additional opportunities for un-established uses	Ordnance Survey maps
(e.g. making productive use of under-utilised	Aerial photography
facilities such as garage blocks)	Planning applications
	Site surveys
Business requirements and aspirations	Enquiries received by local planning
	authority
	Active engagement with sector
Sites in rural locations	Local and neighbourhood plans
Large scale redevelopment and redesign of	Planning applications
existing residential or economic areas	Ordnance Survey maps
Sites in adjoining villages and rural exceptions	Aerial photography
sites	Site surveys
Potential urban extensions and new free-	Sustainability Appraisal Scoping Report
standing settlement	Landscape and heritage assessments

- 2.5 To ensure the process to identify land is transparent and identifies as many potential opportunities as possible, a call for sites was issued on 15 January 2021 with a submission deadline of 21 April 2021<sup>4</sup>. Details were published on the Council's website, circulated to those on the Local Plan contact database and publicised through adverts in the local press and social media posts.
- 2.6 A total of 298 site submissions were received through the call for sites. There are currently 420 sites within the SLAA. As the Local Plan progresses towards adoption, further sites may be submitted to the Council or circumstances may change on the sites included within the SLAA. The SLAA will be updated again during the plan making process to ensure site assessments remain up to date.

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<sup>&</sup>lt;sup>4</sup> Late submissions may still be considered to inform the emerging Local Plan, if received before critical tasks have been completed.

# Stage 2 – Site / broad location assessment

#### Housing Development potential

- 2.7 The draft SLAA Methodology had proposed a density of between 30-50 dwellings per hectare which differentiated by location. However, upon further investigation, it is considered that any density above 35dph in settlements outside Saffron Walden and Great Dunmow is not justified by evidence.
- 2.8 A search of the applications covering both planning permissions and completions which make up the five-year housing land supply has established that outside of the main settlements of Saffron Walden and Great Dunmow, or a new settlement, a density of above 35dph is not considered to be appropriate, as any higher density would not be considered to be in keeping with existing settlements across the district. To aid consistency in site assessments, a figure of 35dph and 45 dph is set out below:

Location	Density	Justification
Within Saffron Walden or	45 dwellings per	Allows a mix of housing types
Great Dunmow	hectare (dph)	comprising houses, terraces and flats
Within any other settlement	35 dph	Respects the rural character of
		Uttlesford
Adjacent to any settlement	35 dph	Respects the rural character of
	·	Uttlesford
New settlement	45 dph	Based on the main large settlements in
	·	the district.

2.9 The estimation of development potential will be based on the net developable area of a site. Smaller sites will typically make use of existing roads and facilities, potentially enabling up to 100% of the site area to be developed. However, larger sites will require space for internal access roads, strategic open space and landscaping so the developable area will be reduced. Informed by assumptions used for the withdrawn Submission Local Plan, the ratios identified in the following table will be used to calculate the net developable area of each site.

Site size	Gross to net ratio
Up to 0.4 hectares	100%
0.4 – 2 hectares	90%
2 – 15 hectares	75%
15 hectares and above	60%

#### Employment development

- 2.10 Where the capacity of employment development sites is not provided, it will be estimated on the basis of the development density assumptions are as follows:
- 2.11 The sqm floorspace projections<sup>5</sup> above have been converted to a land need based on the following plot ratios:
  - 0.3 hectares for office and R&D uses:
  - 0.4 hectares for industrial uses: and
  - 0.5 hectares for warehouse / distribution floorspace.

<sup>&</sup>lt;sup>5</sup> Uttlesford Employment Needs & Economic Development Evidence (November 2021). 10.3 page 99

#### Assessing whether sites are likely to be developed

2.12 Plan-makers must assess the suitability, availability and achievability of sites, including whether the site is economically viable. A judgment can therefore be made as to whether a site is deliverable within the next five years, or developable over a longer period.

#### Suitability

- 2.13 A basic level of information will be recorded for all identified sites. Depending on the data source, some of this information may not be readily available so enquiries may need to be made. The information, as described in the PPG, is as follows:
- Site size, boundaries, and location
- Current land use and character
- · Land uses and character of surrounding area
- Physical constraints (e.g. access, contamination, steep slopes, flood risk, natural features of significance, location of infrastructure/utilities)
- Potential environmental constraints
- Consistency with the development plan's policies<sup>6</sup>
- Proximity to services and other infrastructure, such as public transport
- Where relevant, development progress (e.g. ground works completed, number of units started, number of units completed)
- 2.14 Constraints mapping data will be sourced from the Uttlesford GIS add reference here. Planning app

#### Availability

- 2.15 A site can be considered available for development when, on the best information available, there is evidence provided by the landowner that there are no legal or ownership impediments to development. Call for sites submissions will include information to assist this assessment, although enquiries may need to be made by officers where details are lacking and for sites identified from other sources.
- 2.16 The following criteria will be used to assess availability:
  - Ownership/control
  - Sole owner
  - Multiple owners
  - Availability confirmed by owner(s)
  - Legal or ownership issues<sup>7</sup>

#### Achievability

- 2.17 A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.
- 2.18 The following criteria will be used to assess achievability:

# Market factors

As the r

<sup>&</sup>lt;sup>6</sup> As the new Local Plan is at an early stage of preparation, it is likely that limited/no information on this topic will be available initially and a 'policy off' assessment will be undertaken within the SLAA. <sup>7</sup> For example, whether formal agreements are in place to ensure that land outside of the direct control of the owner(s) is made available to support delivery.

- What is the market strength of the locality?
- What is the attractiveness of the locality, potential market demand and projected rate of sales?

#### Cost factors

- Are there any constraints for example, flooding, noise or physical features which need to be overcome, and where the cost of mitigation measures may prejudice viability?
- Are there any site preparation costs for example, associated with topography, contamination or existing uses/buildings which may prejudice viability?
- Are there any specific infrastructure requirements for example, transport or utilities infrastructure – which may prejudice viability?

### **Delivery factors**

 Based on the Council's evidence of housing delivery locally and the information submitted by site promoters, what are the realistic build-out rates on larger sites (including likely earliest and latest start and completion dates)?

Amount of development which could be delivered, by time period:

- Pre Year 1: Pre Apr 2024
- Year 1-5: April 2024–Mar 2029
- Years 6-10: Apr 2029-Mar 2034
- Years 11-15: Apr 2034-Mar 2039
- Post Year 15: Post Mar 2039
- Is a single developer, or are several developers, offering different housing products?
- What is the size and capacity of the developer?

#### Suitability, Availability, Achievability

Suitability		
Question Title	Explanation	
Physical	An assessment of any other physical constraints that would need to be	
Constraints	overcome through the planning application process e.g. access to the	
	site, infrastructure, neighbouring uses, proximity of waste water	
	treatment works, topography, mineral designations, etc. ground	
	conditions, hazardous risks, pollution or contamination	
Overcoming A range of potential solutions for any constraints		
suitability		
constraints		
Availability		
Submitted by?	Whether the site has been submitted by a landowner or an agent, and	
	whether there is a developer involved. This question will not feature any	
	names, addresses or personal details of any kind.	
Availability	Whether the site has a history of unimplemented planning permissions.	
Considerations	The number of landowners there are on the site. Impact of the existing	
	land use of the site on availability. Impact of any land ownership	
	constraints or any third party land required.	

Overcoming A range of potential solutions for any constraints	
availability	
constraints	
Achievability	
Is the site	Developer interest in the site can demonstrate that it is economically
economically	viable, along with a recent history of planning applications showing
viable?	developer intent.
Overall Deliverability	Depending on the evidence submitted in the suitability, availability and achievability sections, a site will be given a deliverability timescale, these being:
	0-5 years- no constraints to deliverability, or constraints can be mitigated. Units will be projected from the start of the supply period.
	6-10 years – constraints have been found that will take time to be mitigated, or the site is part of long-term phase. Units will be projected from year 6 of the plan period.
	11-15 years – significant constraints have been found that will take significant time to be mitigated, or the site is part of long-term phase. Units will be projected from year 11 of the plan period.
	Not deliverable – the constraints on the site cannot be mitigated against, and the site is held in abeyance, no units from this site will be projected in the supply.

## Site classification

Once a site has been assessed against the suitability, availability and achievability criteria, it will be given a classification from A to C in accordance with the below table.

Classification	Description
A: Considered deliverable within 0-5 years	<ul> <li>These are sites are considered deliverable within the first five years of the plan period. They either</li> <li>Have planning permission; or</li> <li>Do not currently have planning permission but are largely free from major physical and infrastructure constraints. The sites are broadly in line with national planning policy considerations</li> </ul>
B: Have potential to demonstrate suitability, availability, and achievability within 5-15	These are sites where there is either a change in policy or evidence is needed to demonstrate the achievability or suitability within the plan period. This could include, for example, mitigating impacts of noise or air pollution, mitigating against flooding, or minimising the impact on neighbouring uses or the landscape, historic or natural assets.
C: Not considered developable 15+	These sites are not considered developable for one or more of the following reasons:  • Development is unlikely or will not take place within the plan period  • Unable or unlikely to address physical constraints  • Unable or unlikely to address achievability issues  • Incompatible with National Policy

#### Engagement with site owners and promoters

2.19 It is likely that Council officers will need to liaise with some site owners and promoters to further their understanding of development potential. Any such engagement will take place in accordance with the approved *Local Plan Community Engagement Strategy* 2021<sup>8</sup>.

#### Site visits

2.20 It will not always be necessary to carry out a site visit in order to complete an assessment. However, depending on the nature of the site and any uncertainties regarding particular assessment criteria site visits will be undertaken by officers.

#### Updating the site assessments

2.21 As parallel work on the new Local Plan progresses, it will be necessary to update the SLAA. Further sites may come forward and there may be changes to the suitability criteria described above.

#### Stage 3 – Windfall assessment

- 2.22 The most recent evidence on windfall allowance was approved by the Council's Local Plan Leadership Group on 24 June 2021 and is contained within the supporting report entitled *Windfall Allowance for Uttlesford (June 2021)*. The report considers the delivery of windfall sites over the 10-year period from 2010/11 to 2019/20, concluding that there is evidence to justify a windfall allowance of **114 dwellings per year**.
- 2.23 If the Council identifies broad locations for development in years 6-15, this windfall allowance may be used.
- 2.24 Upcoming work will examine the windfall allowance so it is possible the figure will change. If this is the case, the SLAA methodology will be updated accordingly.

#### Stage 4 – Assessment review

- 2.25 Once the sites have been assessed, the development potential of all sites can be collected to produce an indicative trajectory. This should set out the amount of housing and economic development that can be provided, and at what point in the future (i.e. within years 1 to 5, 6 to 10, and 11 onwards).
- 2.26 If there are insufficient sites to meet objectively assessed needs (including the identified local need), the Council will need to reconsider its assessment of sites. This could include, for example, issuing a further call for sites, or changing the assumptions about development potential to ensure the most efficient use of land.
- 2.27 While the scenario is considered highly unlikely for the district of Uttlesford, if insufficient land remains it will be necessary to investigate how this shortfall can be planned for. If there is clear evidence that the needs cannot be met locally, it will be necessary to consider how needs might be met in adjoining areas through the process of preparing statement of common ground, and in accordance with the duty to cooperate.

 $<sup>^{\</sup>rm 8}$  In particular, paragraphs 5.20-5.22 and Appendix F

#### Stage 5 – Final evidence base

- 2.28 The following outputs will be produced following the assessment:
- A list of all sites or broad locations considered, cross-referenced to their locations on maps
- An assessment of each site or broad location, including:
  - o Where these have been discounted, evidence justifying the reasons given
  - Where these are considered suitable, available and achievable, the potential type and quantity of development, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when
  - An indicative trajectory of anticipated development based on the evidence available
- 2.29 The assessment will be made publicly available on the Council's website, accessible from the landing page at <a href="www.uttlesford.gov.uk/new-local-plan">www.uttlesford.gov.uk/new-local-plan</a>. The publication format will be designed for accessibility, and will include an interactive map.
- 2.30 The assessment will be used to inform plan-making, and to demonstrate whether there is a five-year housing land supply (for example, utilising sites in classifications A and B) for both plan-making and decision-taking.

# Appendix A – Strategic Site Availability Assessment (SLAA) Form

The Suitability criterion have been added to the below Site Assessment Template Form setting out how the suitability criterion have been assessed.

Site assessment form		
Ref:		
Site address:		
Site classification:		
[Map]		
Existing use:		
Proposed use:		
Site area (ha):		
Developable area (ha):		
Capacity:	[Homes] [Economic developme	nt floorspace] [Other]
Surrounding uses:	North:	East:
Surrounding uses.	South:	West:
Source:		
List of submitted studies/reports:		
Suitability – Initial assessment		
For housing and economic developments, would the minimum threshold of development require the use of land in Flood Zone 2 or 3?		
Would the proposed development clearly have an adverse effect on a Site of Special Scientific Interest (SSSI)?		
Would the proposed development clearly result in the loss or deterioration of ancient woodland?  Would the proposed		
development clearly		

result in substantial harm to, or loss of, a scheduled monument?	
Would the proposed development clearly result in substantial harm to, or loss of, a Grade I or Grade II* listed building?	
Would the proposed development clearly result in substantial harm to, or loss of, a Grade I or Grade II* registered park or garden?	
Conclusion:	[Classification: E] / [Progress to detailed assessment]
Suitability – Detailed ass	essment
National policy constrair	nts
Does the site meet the definition of previously developed land?	
Is the site within or adjoining an existing settlement?	
Local policy constraints	
<sup>9</sup> Proximity to Green Belt	
Proximity to the Countryside Protection Zone	
Proximity to a Public Safety Zone	
Proximity to Important Woodland	
Proximity to a Special Verge	
Proximity to a Historic Landscape	
Proximity to a Local Historic Park/Garden	
Proximity to a Protected Lane	

<sup>&</sup>lt;sup>9</sup> Proximity is defined as whether the site is wholly within, partially within, adjacent to but outside or outside a particular constraint.

Proximity to a Protected Open Space	
Proximity to a Poor Air Quality Zone	
Is the site designated/allocated within a made Neighbourhood Plan?	
Flooding	
Which fluvial flood zone applies to the site?	
Which surface water flood zone applies to the site?	
Which groundwater flood zone applies to the site?	
Pollution	
Which aircraft noise contour applies to the site?	
Are there any potential noise issues?	
Proximity to an Air Quality Management Area (AQMA)	
Would development on the site increase movements through an AQMA?	
Which groundwater source protection zone applies to the site?	
If the site is ≥5 ha, is it within a Minerals Safeguarding Area for sand and gravel?	
If the site is ≥3 ha, is it within a Minerals Safeguarding Area for chalk?	
Is the site within a Minerals Safeguarding Area for brick earth or brick clay?	
Is the site within a Waste Consultation Area?	

Natural environment	
Proximity to Site of Special Scientific Interest Impact Risk Zones (SSSI IRZs)	
Proximity to European sites (Special Area of Conservation, Special Protection Area and/or Ramsar site)	
Proximity to National Nature Reserves (NNRs)	
Proximity to Local Wildlife Sites (LWSs)	
Proximity to BAP priority habitat	
Proximity to ancient woodland	
Proximity to Local Geological Sites	
Proximity to National Trails and public rights of way	
Landscape sensitivity	
Is the site within an area noted in a Historic Settlement Character Assessment?	
Are there any Tree Preservation Orders (TPOs) on the site?	
Which Agricultural Land Classification applies to the site?	
Historic environment	
Proximity to scheduled monuments	
Proximity to archaeological sites	
Proximity to listed buildings	
Proximity to locally listed heritage assets	
Proximity to conservation areas	
Proximity to registered parks and gardens	

Accessibility			
Primary school walking catchment			
Secondary school acces	Secondary school accessibility catchments for:		
Walking			
Cycling			
Public transport			
Sixth form accessibility of	catchments:		
Walking			
Cycling			
Public transport			
College accessibility cate	chments:		
Walking			
Cycling			
Public transport			
GP and health centre acc	cessibility catchments:		
Walking			
Public transport			
Hospital accessibility car	tchments:		
Walking			
Public transport			
Fruit and vegetable retail	ler accessibility catchments:		
Walking			
Public transport			
Local centres accessibility catchments:			

Walking	
Cycling	
Public transport	
Employment centres acc	essibility catchments:
Walking	
Cycling	
Public transport	
Bus and rail network wal	king catchments:
1 service per hour	
4 services per hour	
Rail station accessibility	catchments:
Walking	
Cycling	
Public transport	
Is there a viable route from the site to the principal or strategic road network (B roads, A roads and motorways)?	
Are there any fundamental constraints affecting safe site access for road/path users?	
Other land uses	
Would there be a net loss of open space, sports or recreational facilities?	
Would there be a net loss of employment land?	

Would there be a net loss of retail	
provision?	
Would there be a net	
loss of community	
facilities?	
If new homes are to be	
completed before 2030,	
do forecasts suggest a	
surplus or deficit of	
school places?	
If known, would any	
additional uses or	
infrastructure	
(including green	
infrastructure) be provided on site?	
provided on site!	
Conclusion:	
Availability	
Is the site under single or multiple ownership?	
Has availability been	
confirmed by the	
owner(s)?	
Are there any known	
legal, ownership or control issues?	
	ount of floor among (in m2) which accord by delivered in each
time period	ount of floor space (in m²) which could be delivered in each
Pre Year 1: Pre Apr	
2024	
Y1: Apr 24-Mar 25	
Y2: Apr 25-Mar 26	
Y3: Apr 26-Mar 27	
Y4: Apr 27-Mar 28	
Y5: Apr 28-Mar 29	
Y6-10: Apr 29-Mar 34	
Y11-15: Apr 34-Mar 39	
Post Y15: Post Mar 39	

What is the expected duration of	
development (including	
commencement and	
completion dates)?	
What would be the completion rate, in	
terms of the number of	
homes or amount of	
floor space (m <sup>2</sup> )	
completed per year?	
Conclusion:	
Achievability	
Market factors	
What is the market	
strength of the locality?	
What is the	
attractiveness of the	
locality, potential	
market demand and projected rate of sales?	
Cost factors	
Are there any	
constraints – for example, flooding,	
noise or physical	
features – which need	
to be overcome, and	
where the cost of mitigation measures	
may prejudice	
viability?	
Are there any site	
preparation costs – for example, associated	
with topography,	
contamination or	
existing uses/buildings	
– which may prejudice viability?	
Are there any specific	
infrastructure	
requirements – for	
example, transport or utilities infrastructure –	
which may prejudice	
viability?	

Summary of deliverable/developable capacity								
Reference	Suitable?	Available?	Achievable?	Deliverable capacity Pre Year 1	Deliverable capacity Years 1-5	Developable capacity Years 5-10	Developable capacity Years 10-15	Capacity not currently developable

Appendix C: SLAA Technical Consultation - copy of email consultation invitation sent to Parish and Town Councils and Landowners/Site promoters on 18 October 2021

#### Dear Sir/Madam

This email is being sent to all Town/Parish Councils, inviting comments on our initial assessment of sites that are potentially available for development. It is also being sent to those who submitted sites to us following the 'call for sites' in Spring 2021, and to Councillors (primarily for information purposes).

It is important to bear in mind that only some of these sites will be chosen for inclusion in the Local Plan and the Council is expecting to make that decision next Spring based on planning evidence. The first part of that evidence is a technical assessment for each site and your comments on that assessment are now requested.

All site assessments are ordered by parish within a single PDF document, which can be downloaded <a href="https://example.com/here">here</a>. The assessments do not cover 'committed sites' – housing and employment sites already with planning permission. These will be factored into our calculations on additional requirements, and in our proposals for where additional homes and jobs should be located.

The assessments have been completed as a desktop exercise, utilising a wide range of spatial data, by AECOM – the Council's consultants carrying out the sustainability appraisal of the Local Plan. They will feed into a broader piece of site assessment work known as the Strategic Land Availability Assessment (SLAA). An initial SLAA methodology was published in April – <a href="here">here</a> – and the process will be fully documented in reports that we will publish alongside our consultation on the Draft Local Plan (Regulation 18) in Spring 2022.

The purpose of this technical consultation is as follows:

- a) To review the plotted site boundaries
- b) To fact-check the results from our desktop analysis

The technical consultation is not an opportunity to make general comments on the suitability of a site. Please reserve any such comments for the assessment of the sites to be published alongside the Local Plan in the Spring.

Please send any comments to <u>localplan@uttlesford.gov.uk</u>, ensuring that the Subject field includes the words "SLAA Technical Consultation". Comments must be received by **29 November 2021**.

This stage of consultation with Town and Parish Councils is one of several opportunities over the coming months that local councils will have to comment on the emerging Local Plan, and we look forward to your response to help the District Council make the best decisions for the future planning of Uttlesford.

#### Please note:

- Sites have been referenced according to the format, [Parish] [Unique three-digit number] [Predominant use]. The 'predominant use' (RES Residential; EMP Employment; COM Community; MIX Mixed use; OTH Other; ??? To be confirmed) should be treated as indicative at this stage.
- The attached document describes the GIS analysis methodology, including how Red/Amber/Green thresholds have been applied.
- Wimbish 003 MIX: We are aware of an error regarding this site boundary. This will be resolved before the assessment is finalised.

#### **Local Plan and New Communities Team**

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## Appendix D: SLAA Technical Consultation – Summary of Comments and Review

Key general issues identified in the responses received were as follows:

- 1. Clarity was sought within the responses on the purpose of the consultation, the stage of plan making and what and when comments on sites were required. This is a key takeaway from the consultation. The questions and plan making stages will be more defined in future.
- 2. The level of detail which has been provided has been informative and has informed the SLAA Methodology. Factual site information will inform the assessment of sites over the coming months.
- 3. A key response to the SLAA was in reference to whether or not a site should be allocated. The intention of the SLAA is to assess available sites within the district and assess if they are deliverable. It is not the purpose of the SLAA to ascertain if they are suitable for potential allocation. It is however accepted that clarity should have been set out as part of the consultation on the SLAA process.
- 4. Further details on the Red/Amber/Green (RAG) ratings and values of the cumulative assessment of RAG ratings in decision making on sites were sought. Red RAG ratings of constraints such as Greenbelt, Countryside Protection Zone, Development Limits do not mean sites are not deliverable within the context of the SLAA. This is accepted and the individual RAG ratings have been removed from the SLAA Methodology.
- 5. Clarity was sought on the distances of the proximity to infrastructure, the data source and how this will be used to assess sites. The distances to infrastructure are used as a guide to relative sustainability of the site; they are not exact measurements or result in values or scoring of sites.

	Key questions/issues	Comments
1	for example a site in a conservation area and has a red score. This does not mean it is inappropriate for development.	Noted. The final SLAA Methodology has been revised to remove the scoring of individual site characteristics by RAG ratings (Red/Amber/Green).
2	assessment criteria are set out into themes which are supposed to align with the SA themes. How some of the criteria used for the	revised to remove the scoring of individual site characteristics by RAG ratings (Red/Amber/Green).
3	Question the methodology in relation to RAG ratings for TPOs Historic Environment, SSSI impact risk zone in determining the spatial strategy	Noted. The final SLAA Methodology has been revised to remove the scoring of individual site

		Library Assisting to DAO
		characteristics by RAG
4	It is suitical in toward of the decision taking museum that LIDC.	ratings (Red/Amber/Green). All available sites will be
4	It is critical in terms of the decision-taking process that UDC:	
	- discloses to Parish Councils, before proposing any site for	assessed consistently, taking
	inclusion in its revised draft Local Plan, the reasons for such	into account where
	selection; and	comments have been
	- ahead of initiating the formal Regulation 18 consultation	received and the clear
	procedure, provides Parish Councils concerned with an	justification for site selection
	opportunity to make formal representations relating to matters of	will be published. as part of
	fact regarding any such site proposed	the Local Plan evidence
		base. In addition, a further
		assessment of sites and the
		reasoning/justification for the
		proposed allocations will be
		set out within a separate Site
		Selection Methodology. The
		publication of the draft Local
		Plan will provide the
_	Mildhautan undan tandin nathana ana ana atau ta dha airean a ta dha airean a ta dha airean a ta dha airean a t	opportunity for comments,
	Without an understanding of the access to the site and potential	Noted. Through consultation
	layout it is more difficult for the parish council to verify the	with ECC Highway's we will
	technical data as walking distances	assess access for all sites.
	It is unclear whether there has been consultation on the SLAA	The SLAA methodology was
	methodology	noted by Local plan
		Leadership Group, 29 April
		2021. Although the SLAA
		Technical Consultation (18
		October – 29 November
		2021) was a fact checking
		exercise, comments were
		received as part of the
		consultation, which have informed the final SLAA
		methodology.
7	SLAA Technical consultation does not take into consideration new	
	facilities and infrastructure which will be delivered through	assessment as to whether a
	development	site has the potential for
	development	development. Through the
		site allocation's process
		policy considerations and
		new facilities and
		infrastructure will be
		considered in assessing if
		sites are appropriate for
		allocation.
8	Concern that suitability and deliverability should rely on a desk top	
	exercise	suitability and achievability
		combines both desk top
		analysis, officer judgement
		and site knowledge and visits
		where required. The final
		SLAA Methodology has been
		revised accordingly.
9	How have the stated times and distances been determined?	Journey times are based on
1		catchment time zones
		indicated on TRACC
		Accessibility Analysis
		outputs. Assumptions,
		limitations, data sets and
		methodology for identifying
		, , , , , ,

		catchments are outlined in the Uttlesford TRACC Datasets and Parameters Technical Note (20210818) available here (click on the Technical Note link via the webpage)
10	The same accessibility assessment of employment sites is not relevant. Should be treated different to residential	Noted, Further explanation on the assessment of Employment sites has been added to the Final SLAA Methodology.
11	Walking and cycling routes do not take into account suitability or safety	Noted, the routes are used as a guide to distances and journey times and do not take into consideration highways safety.
12	There are multiple inaccuracies in the measurements and omissions in the information presented in the Site Proformas	The TRACC Accessibility Analysis has been undertaken to provide an indication of the potential accessibility of areas within the district to a range of facility types. This provides a high-level indication of accessibility. It is not intended to provide accurate to the minute journey times. It is used to provide an indication of indicative access to infrastructure and services. The accessibility catchments are not a definitive indicator that an undeveloped area is accessible. Development may require and provide new infrastructure or services.
13	There is a reference to data limitations in the GIS analysis but the generalisations that have been applied throughout the desk-top initial assessment of sites have caused data flaws and inaccuracies. This lack of precision and clarity brings into question the validity of the entire document. Some attributes are not included or are different from the UDC Constraints Map. The document GIS Analysis Methodology shows data is said to be derived from disparate sources, including the Department for Levelling Up, the Environment Agency, Historic England and Natural England, with no further reference. It is impractical for members of the Parish Council to search out these sources.	Noted. The Uttlesford District Council constraints map will be the data source for
14	Treatment of the Green Belt - the SLAA methodology is correct and supported. The RAG rating should not be applied because it is a policy consideration.  The Green Belt status should therefore not form part of the analysis at this stage	The SLAA is a 'policy off' assessment as to whether a site has the potential for development. Through the site allocation's process policy considerations will be considered in assessing if sites are appropriate for allocation. The final SLAA Methodology has been

		revised to remove the scoring by RAG ratings (Red/Amber/Green).
15	criterion as limits are out of date.	The final SLAA Methodology has been revised to remove the scoring of individual site characteristics by RAG ratings (Red/Amber/Green).
16	, ,	The final SLAA Methodology has been revised to remove the scoring of individual site characteristics by RAG
17	The whole of the district comprises either Grade 2 agricultural land, Grade 3 agricultural land, urban land or other land in non-agricultural use. Therefore, the site assessment would be more meaningful and useful if the methodology was amended to score sites 'red' where they predominantly comprise Grade 2 land, 'amber' for Grade 3 land and 'green' for urban or non-agricultural land.	ratings (Red/Amber/Green).
18	criteria is based on a site's position within or outside a Special Protection Zone (SPZ), as defined by the Environment Agency. However, in reality a development's potential impact on groundwater sources will vary depending on a number of site-specific considerations, including geology, topography / levels and the likelihood of pollution from different types of development and uses.	Noted. Constraints published by the Environment Agency will be checked as part of the reassessment of sites. This will be noted within the site assessments as a constraint, how constraints and development potential will be assessed in detail further along in the Local Plan process.
19	worse. However, these two things are not linked, as existing settlements are not necessarily historic landscapes.	Noted. Proximity to Historic Landscapes will be removed from the SLAA. There is reference to heritage assets, conservation areas, and the landscape and heritage sensitivity evidence in the SLAA
20	' '	The final SLAA Methodology has been revised to remove the scoring of individual site characteristics by RAG ratings (Red/Amber/Green).
21	evidence base) does not identify the location of or area covered by 'Poor Quality Air Zones', nor does it define these areas or explain the significance or impact of this constraint. In addition to the inaccuracies in the assessment that has been undertaken with regards Air Quality, we are also concerned at the lack of evidence and information behind the Poor-Quality Air Zones themselves. There appears to be no framework or methodology in place for the identification of such zones and the process the LPA has been through to get to this point.	Constraints Map (layer titled: Local Plan – poor air quality zones). The SLAA is a 'policy off' assessment as to whether a site has the potential for

		Methodology has been revised to remove the scoring of individual site characteristics by RAG ratings (Red/Amber/Green) assessment.
22	Inaccuracies in Local Heritage List	Noted. It is acknowledged that the Local Heritage List references were incorrect in the Site Proformas 151021 and this will be addressed. The revision will reference the Uttlesford Local Heritage Lists dated 2018 and 2021.
23	There is no reference to Foul water disposal	Noted. Waste Water Treatment Works Access has now been added to the Site Assessment process.
24	Access to the Technical Note within GIS Methodology – link did not work	Noted. The Technical Note can be accessed via this link on the Uttlesford Accessibility Analysis resource
25	The document GIS analysis methodology shows that elsewhere in the tables, data is said to be derived from disparate sources, including the Department for Levelling Up, the Environment Agency, Historic England and Natural England, with no further reference. It is impractical for members of the Parish Council to search out these sources. Furthermore, in some instances (e.g. Listed Buildings) the site of the feature in question is not given. The present Local Plan expired in 2011. In the previous versions of the Plan which failed in 2014 and 2020, the dwellings which had been approved since 2011 were taken into account. The PC takes the view that any increase in numbers must be noted in the current exercise. Inclusion of the following data items is recommended for each parish: No of dwellings, 2011; No of dwellings approved, 2011-2021; Increase in number of dwellings: Percentage increase.  The number of dwellings in 2011 is readily available from the census for that year.	Noted. We appreciate that it is a complex task checking the facts displayed on the Site Proformas 151021 and the sources of information or data. The purpose of the SLAA is to identify a future supply of land which is suitable,
26	Reference to Neighbourhood Plans have been omitted.	The made Neighbourhood Plans form part of Uttlesford's Development Plan, however this is a 'policy off' assessment and local policies and aspirations are not in part of the SLAA assessment process. Neighbourhood Plan policies are addressed at a later stage of the plan making process. Allocations within Neighbourhood Plans are

		included within the SLAA and included within the housing trajectory work.
27	Previous planning applications have been submitted and refused on proposed sites and/or lost at appeal. They should be considered.	Noted, site planning history will be fully assessed up to March 2022. Moving forward, the planning history of sites will be updated prior to examination. The planning history of a site will also inform the assessment of achievability, a past permission or refusal does not determine whether a site is deliverable and may be required if circumstances, national policy or need change.
28	How have journey times been calculated? Journey times are different to those recorded in the proforma, and fall within a different RAG rating	Journey times are based on catchment time zones indicated on TRACC Accessibility Analysis outputs. Assumptions, limitations, data sets and methodology for identifying catchments are outlined in the Uttlesford TRACC Datasets and Parameters Technical Note (20210818). The Uttlesford TRACC analysis has been undertaken to provide an indication of the potential accessibility of areas within the district to a range of facility types. This provides a high-level indication accessibility. It is intended to be used as a guide. However, highly inaccurate ratings will be noted in the detailed SLAA assessment.
29	Schools: Is this based on state primary and secondary schools? Are private/fee paying schools included?	The destination data source for schools is <a href="www.get-information-schools.service.gov.uk">www.get-information-schools.service.gov.uk</a> (formerly Edubase) as stated in the TRACC Technical Note in Appendix 2. It is based on state primary and secondary schools only. Private/fee paying schools are excluded.
30	Primary school (walking): The distance to the primary school is not appropriate or feasible for young children	We acknowledge that some distances may not be appropriate for very young children and that walking times may be slower. The

		journey times will be used as a guide to inform detailed assessment of sites.
31	secondary schools / sixth forms which are used by different	The destination data source for schools is <a href="www.get-information-schools.service.gov.uk">www.get-information-schools.service.gov.uk</a> (formerly Edubase) as stated in the TRACC Technical Note in Appendix 2. The journey is based on the nearest secondary school, taking into account and using public transport in term time.
32	Bus service: there are inaccuracies in some bus service journey times. In some instances this is due to temporary time table changes due to the Covid 19 pandemic; significant wait times for required for bus changes/connections.	The bus network journey times are based on public transport provision dataset provided by a National Public Transport Data Repository (NPTDR).  Bus timetables from January 2020 were used in the analysis to reflect the pre-Covid bus network operation. The analysis took place during the pandemic whilst reduced services were in operation, therefore it was requested by UDC to use the last available data prior to service reductions to reflect what accessibility was like prior to lockdown. The analysis uses the timetables from a Wednesday. The time periods used are detailed in the TRACC Technical Note in Appendix 2. This will be reviewed as the Local Plan evidence is updated as bus data is likely to change.
33	GP & health centre: GP services are over subscribed and not accepting new patients	This analysis looks at accessibility to the closest GP. Potential allocations in the Local Plan will take into account the need for and the provision of additional healthcare infrastructure.
34	Hospital (public transport): Full health services are not available at Saffron Walden community Hospital and Herts & Essex in Bishop's Stortford. Journey times to general hospitals with accident & emergency (Addenbrookes and Princes Alexandra Hospital in Harlow) are considerably longer.	With regard to access to hospitals, we appreciate that there are different levels of service provision available at hospitals which serve Uttlesford. Journey times are based on the nearest hospital and intended as a guide to

		inform detailed site assessment.
35	Retailers selling fruit and vegetables - assessment only looks at walking travel time to these shops	The Uttlesford TRACC analysis has been undertaken to provide an indication of the potential accessibility of areas within the district to a range of facility types. This provides a high-level indication accessibility. It is intended to be used as a guide. However, highly inaccurate ratings will be noted in the detailed SLAA assessment.
36	Reference to local convenience stores versus a full supermarket - review if these are acceptable to count towards distance to retailers and food supplies	Distinction between local convenience store vs full supermarkets is not a requirement for this fact checking exercise. Access to retailers that sell fresh fruit & veg is measured, because it contributes to health & wellbeing.
37	Local centres:	Noted, thank you for
	The definition of 'Local Centre' is a location with a post office and a retailer selling fruit & veg. There is no post office at Hatfield Heath and it should not be classified as a Local Centre.	providing updates to the provision in local centres, the local facilities are used to provide a broad indication of relative sustainability of a settlement. These will be
	There is no local centre (shops or post office) in Quendon and Rickling. Times are incorrect. Nearest centre is Newport.	reviewed and updated as part of the plan making process and in deciding whether
	The nearest local centre to Hatfield Broad Oak (where there is no post office) is Takeley/Priors Green.	settlements are appropriate for allocation or not.
	The local centre for Birchanger sites is Waitrose at the motorway service station. This is not designed for general public access	
38	Clarification is sought as to what constitutes an employment centre.	The 'Employment Centres' identified in the TRACC Accessibility analysis are based on locations comprised of town centres, industrial estates and business parks. The locations were cross-referenced with the 2011 Census workplace population data to ensure high job density locations were captured.
39	School services – reference to school services is confusing as would school services not be considered in school (public transport) ratings. Should Bus network be related to non-school services?	The bus services that are included in this assessment are based on registered bus services. There are several services that are specific school services that operate

		during school term time only. For the purposes of this assessment, except for public transport catchments generated for secondary schools, these services have now been removed to ensure that public transport catchments are only generated based on services that also operate throughout school holidays. Services that operate a school term
		variation to serve the school but continue to operate throughout the holiday without visiting the school stop have been retained in the dataset.
40	Bus network 1 service per hour: The no. 5 bus route was revised on 3.11.2021. This bus service no longer meets the criteria of 1 service per hour (now <1 per hour).	Bus service and journey times are based on prepandemic timetables in January 2020. We appreciate that there have some temporary changes have been made. The times are intended to give a highlevel indication of existing services.
41	There is no daily bus service transport in Clavering and Arkesden. There is Demand Responsive Transport Service but not available on a daily basis.	Noted. The bus network journey times are based on public transport provision dataset provided by a National Public Transport Data Repository (NPTDR). Bus services will be reviewed as the Local Plan evidence is updated as it is acknowledged bus data is likely to change.
42	Qualify what adjacent to a settlement development limit means. A site could be near to but not abutting the boundary. Adjacent housing sites built or approved, not yet built, could abut the development limit suggesting a new site, nearby could be an amber rating.	The final SLAA Methodology has been revised to remove the scoring of individual site characteristics by RAG ratings (Red/Amber/Green).
40	Adopted boundaries don't reflect true extent of a settlement.  Proposed sites abut development that has been permitted adjacent to, but outside Settlement Development Limits.	We acknowledge that some development has been permitted outside development limits and may have been either built or in the process of being built. Settlement development limits will be reviewed in the new Draft Local Plan and there will be an opportunity to comment as part of the regulation 18 Consultation.
43	The objective is to support healthy lifestyles for all community groups by reducing health inequalities and delivering positive	The SLAA also considers health & wellbeing in the

	to the level of deprivation of the area and whether it falls within the Stansted Airport Safety Zone. Again, this does not capture information to identify if the objective has been met or to answer potential assessment questions set out in the draft SA Framework	facilities and access to public transport.  The Sustainability Appraisal is a separate assessment which assesses the requirements and duties for Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EqIA) and Health Impact Assessment
44	It is not clear what poor air quality zone relates too, e.g. road, airport etc.	(HIA). There are two poor air quality zones in the district: A zone 100 metres on either side of the central reservation of the M11 and a zone 35 metres either side of the centre of the A120 These are referenced in policy ENV13 of the 2005 Local Plan and are indicated on the Council's Constraints Map. The Air Quality Management Area is also marked on the Constraints Map, located at Saffron Walden.
45	Noise Contours: The GIS methodology does not recognise the 54db noise contour, however it is recognised that 'significant community annoyance' starts at 54db	Noted. Noise will be assessed as part of the Site Selection Methodology and in consultation with UDC Environmental Health Officers.
46	Within the climate change theme, the objective is to reduce the contribution to climate change made by activities in the District. Considerations to achieve this include, proposals to improve or extend local footpaths or cycle paths, promotion of sustainable modes of transport, ability to generate energy from low or zero carbon sources. Yet the site assessment criteria under climate change adaptation is limited to whether the site is at fluvial flood risk. This captures none of the objectives set out in the SA. [row 518]	The SLAA considers this objective in a wider context by looking at walking and cycling accessibility to various services and facilities. It uses this as an objective proxy criterion. Climate change mitigation/adaptation and proposals to move to a net zero position are the core objectives of the Local Plan and will need to be demonstrated in spatial strategy for growth and potential site allocations later within the plan making stages.
47	Climate Change and Adaptation only refers to Fluvial Flood risk. This is not an accurate indication of flooding in specific areas, which have been well documented	Noted. More detailed information will be obtained on localised flood events in the Strategic Flood Risk

		Ta
		Assessment as part of the
		wider evidence based
		supporting the Local Plan.
48	We recommend that the scoring should differentiate between	The classification reflects the
	Grades 1-2 and 3 in order to identify those sites that are less	appropriate importance of
	valued agricultural land, in the context of Uttlesford District	agricultural land. It is
		recognised that much of
		Uttlesford is high grade
		agricultural land and at the
		next stage, RAG ratings have
		been removed for the SLAA
		Methodology.
49	Minerals and Waste Consultation Area - Should not constitute a	Noted. RAG ratings of
	red rating.	individual site characteristics
		have been removed for the
		SLAA Methodology.
50	Countryside Protection Zone: This is a policy designation in the	Noted. The SLAA is a 'policy
	adopted Local Plan and its compliance with the NPPF has not	off' assessment as to whether
	been tested at public examination. Inclusion of this planning	a site has the potential for
	designation with the description of the baseline environment is not	development. Through the
	appropriate and should be omitted from the site assessments.	site allocation's process
		policy considerations will be
		considered in assessing if
		sites are appropriate for
		allocation. The final SLAA
		Methodology has been
		revised to remove the scoring
		of individual site
		characteristics by RAG
		ratings (Red/Amber/Green).
51	The name of some conservation areas (shown in brackets) are	The Conservation appraisals
	incorrect.	are shown on the Council's
		website. Some conservation
		areas are split into more than
		one area. The labels on the
		Constraints Map are incorrect
		and will be updated.
52	All designations within the heritage environment are treated	National Planning Guidance
	equally, whether a listed building is Grade II or Grade I and that all	sets out the method for
	parts of a Conservation Area have the same significance as each	assessing land suitability. A
	other, which is rarely the case. The 50 m distance used for the	site or broad location can be
	amber and green indicators appears arbitrary. Question whether	considered suitable if it would
	the same distance should be applied to all heritage assets.	provide an appropriate
		location for development
		when considered against
		relevant constraints and their
		potential to be mitigated.
		The SLAA identifies
		constraints to be considered,
		including potential impacts
		including the effect upon
		landscapes including
		landscape features, nature
		and heritage conservation.
		The final SLAA Methodology
		has been revised to remove
		the scoring of individual site
I		labara stariation by DAC
		characteristics by RAG
		ratings (Red/Amber/Green).

53	and Local Wildlife Sites, or between Important	The boundary of Important Woodland may be different from that of Ancient Woodland, or a Local Wildlife Site. For example a Local Wildlife Site may only have one part woodland. The final SLAA Methodology has been revised to remove the scoring of individual site characteristics by RAG ratings (Red/Amber/Green).
54	Request for clarity on what Priority Habitat is referred to on the Site Proforma	The final SLAA Methodology has been revised to remove the scoring of individual site characteristics by RAG ratings (Red/Amber/Green).
55	A site may intersect for example an ancient woodland or Priority Habitat so is given a red rating. But the proposed development would protect the area concerned	As point 52 above. The final SLAA Methodology has been revised to remove the scoring of individual site characteristics by RAG ratings (Red/Amber/Green).
56	Hatfield Forest ZOI: consider rating and impact and appropriate mitigation through conditions and S106 contributions. RAG rating criteria need to be included in SLAA methodology	The final SLAA Methodology has been revised to remove the scoring of individual site characteristics by RAG ratings (Red/Amber/Green).
		The Zone of Influence of Hatfield Forest was updated to 10.4km in August 2022. Mitigation of recreational impact on Hatfield Forest is advised by Natural England. Approach to contribution to the mitigation strategy is under discussion with neighbouring Local Authorities, Natural England, National Trust and Essex place Services.
57	What is the definition of Important Woodland?	Important woodlands are referenced in paragraph 5.13 of the 2005 Local Plan. They are a local designation, recognised by Uttlesford District Council and are identified on the Council's Constraints Map in the layer titled 'Local Plan - important woodlands'.
58	Local Wildlife Sites - Question whether there should be differentiation between sites that intersect and adjoin LoWS	Noted. The final SLAA Methodology has been revised to remove the scoring of individual site characteristics by RAG ratings (Red/Amber/Green).