

Uttlesford District Council – Proposed Response

Chapter 4 Housing

Added text – shown underlined

Deleted text – shown crossed out or struck through

Paragraphs 4.1-4.7

Ref	Key Issue (from overarching summary)	Council’s Response	Change to the plan
	Concern over policy approach to size, type and tenure of houses	See response to Policy H2, H6, H8	
	Concern over policy approach to meeting accommodation needs of gypsy and travellers	See response to Policy H9	

Housing Density Policy H1 and associated paragraph 4.8

Ref	Key Issue (from overarching summary)	Council’s Response	Change to the plan				
H1	Densities are too high and do not reflect character of Uttlesford	<p>The figures in the policy are based on the Urban Capacity Study work carried out in 2005. Densities in the district have not changed significantly in the last ten years. This study investigated historic densities of existing typical housing areas in Saffron Walden, Great Dunmow and Stansted Mountfitchet. This provided an indication as to the range of densities of various styles of developments that already exist and with which people are familiar. This found the following:-</p> <table border="1" data-bbox="920 1334 1469 1369"> <tr> <td>Housing Type</td> <td>Density Range:</td> </tr> </table>	Housing Type	Density Range:	<p>Policy H1 - Housing Density <u>Unless otherwise specified in a Neighbourhood Plan</u>, housing development will be expected to achieve the average densities within the following ranges depending on the location of the development <u>and taking into account to the character of the area</u>.</p> <table border="1" data-bbox="1543 1299 2031 1369"> <tr> <td>Location</td> <td>Number of dwellings per</td> </tr> </table>	Location	Number of dwellings per
Housing Type	Density Range:						
Location	Number of dwellings per						

		<table border="1"> <tr> <td></td> <td>(dwellings per ha)</td> </tr> <tr> <td>Low density detached, linked, semi detached</td> <td>30-32</td> </tr> <tr> <td>Terraced housing</td> <td>35-67</td> </tr> <tr> <td>Flats</td> <td>38-122</td> </tr> <tr> <td>Mixed flats and houses</td> <td>50-128</td> </tr> </table> <p>These figures relating to housing types have been used to consider the types of housing acceptable in the 3 locations identified in the policy. The Council consider it important to have a policy guiding the density of development. The Council's approach is to ensure the most efficient use of land, while maintaining the character of the towns and villages of the district. The densities are based on the densities of existing housing and are not considered too high. The draft policy allows flexibility by allowing consideration of 'location of the development' and having regard to the Design Policies. However it is accepted that this flexibility could be made clearer in the policy and it is proposed to include reference to the character of the area.</p>		(dwellings per ha)	Low density detached, linked, semi detached	30-32	Terraced housing	35-67	Flats	38-122	Mixed flats and houses	50-128	<table border="1"> <tr> <td></td> <td>hectare</td> </tr> <tr> <td>Within the town development limits of Saffron Walden and Great Dunmow</td> <td>35-60</td> </tr> <tr> <td>Within the Development Limits of any other settlement</td> <td>30-50</td> </tr> <tr> <td>Adjacent to any settlement</td> <td>30-50</td> </tr> </table> <p>Housing development will be expected to make the most efficient use of land having regard to the Design Policies D1 – D10 set out in the Local Plan.</p>		hectare	Within the town development limits of Saffron Walden and Great Dunmow	35-60	Within the Development Limits of any other settlement	30-50	Adjacent to any settlement	30-50
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H1	Policy should be more flexible	<p>The draft policy allows flexibility by allowing consideration of 'location of the development' and having regard to the Design Policies. However it is accepted that this flexibility could be made clearer in the policy and it is proposed to include reference to the character of the area.</p>																			

H1	Make reference to density policies in Neighbourhood Plans	It is accepted that the policy should refer to any equivalent policy in a Neighbourhood Plan	
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Housing Mix Policy H2 and associated paragraphs 4.9 – 4.10

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
	Greater need for smaller properties	The policy is based on the evidence of the Strategic Housing Market Assessment as required by the NPPF.	No change.
H2	The sustainability Appraisal considers that there is a small degree of uncertainty surrounding the historic environment and the policy could make reference to the protection of the historic built environment as a physical reason why a housing mix cannot be achieved in some instances.	Amend policy to include reference to having regard to heritage assets.	Policy H2 – Housing Mix New housing developments will provide for a mix of house types and sizes to meet the different needs of the local area and the District as a whole including a significant proportion of 3 and 4+ bedroom market housing and 2 and 3 bedroom affordable housing to meet the needs of families as evidenced by the most recent Strategic Housing Market Assessment having regard to local character, <u>significance of heritage assets</u> and the viability of the development which will be assessed on a site by site basis.

Subdivision of Dwellings Policy H3 and associated paragraph 4.11

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
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H3	Ensuring a unit is not created subject to flood risk without area of refuge.	This is mentioned in the text and it is proposed to amend the policy to include reference to prevent units being at risk from flooding without a refuge	<p>Policy H3 - Sub-division of Dwellings and Dwellings in Multiple Occupancy</p> <p>The subdivision of dwellings into two or more units or the change of use of dwellings to houses of multiple occupancy will be permitted provided that:</p> <p>a. Sufficient car parking is provided in accordance with the Essex Parking Standards, Local standards and subsequent updates;</p> <p>b. There would be no material overlooking of neighbouring properties;</p> <p>c. A reasonable amount of amenity space is provided in accordance with the Essex Design Guide or subsequent design guidance for the occupiers of the newly-created units;</p> <p><u>d. If the dwelling is located within a flood risk area, no residential unit is created without access to a first floor level for refuge;</u></p> <p>e. The development would not have a detrimental effect on the character of the area by reason of:</p> <ul style="list-style-type: none"> • On street parking; • The loss of garden space for use as car parking; and • Unreasonable noise and disturbance to the occupiers of neighbouring properties from vehicles or any other cause.
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H3	Ensuring sufficient off street parking; Ensuring no detrimental impact on street scene, character or identity of area;	The policy specially refers to the need to provide sufficient car parking; amenity space in accordance with the Essex Design Guide and not having a detrimental effect on the character of the area in order for the development to be permitted.	No change
H3	Inappropriate to encourage such development	Having no policy would mean that there was no guidance in determining planning applications for subdivision of dwellings. The sustainability appraisal concludes that not having a policy may adversely affect the character of the area through an intensification which may comprise on-street parking, the use of garden space for car parking, an increase in overlooking or adjacent properties and general noise and disturbance. The Council believe that having a policy on the subdivision of dwelling would mitigate or prevent these adverse issues from arising	Retain policy.

Policy H4 Residential Extensions and Replacement Dwellings in the Countryside and the Green Belt and associated paragraphs 4.12 – 4.13

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
4.13 H4	Concern over consistency of policy with national guidance	<p>The core planning principles listed in Paragraph 17 of the NPPF includes recognising the intrinsic character and beauty of the countryside and is therefore considered important to have a policy to protect the countryside which includes controlling the amount of new development built though extensions or replacement dwellings.</p> <p>It is considered however that the policy should make a distinction between proposals within and beyond the Green belt. Proposals within the</p>	<p>Paragraph 4.13 Delete 'Policy H4 below sets out the considerations for proposals for residential extensions and replacement dwellings in the countryside and the Green Belt.'</p> <p>Delete policy and replace with Policy H4 - House Extensions and Replacement Dwellings beyond Development Limits</p>

		<p>Green Belt will need to accord with National Policy relating to size. Beyond the Green Belt it is proposed to amend the policy to remove reference to preventing disproportionately large increases but having a criteria to prevent development which would increase the impact of the dwelling over and above the impact of the existing dwelling.</p>	<p>House extensions and replacement dwellings beyond the Green Belt:</p> <ul style="list-style-type: none"> • Proposals to extend or replace existing dwellings within the area designated as Countryside or Countryside Protection Zone will be permitted provided that the proposal would not materially increase the impact of the dwelling on the appearance of the surrounding countryside or the open character of the Countryside Protection Zone by virtue of its siting, scale, height, character and design • A replacement dwelling should be positioned on or close to the footprint of the existing dwelling, unless design, landscape, highway safety, residential amenity or other environmental grounds indicate that a more appropriate location on the plot can be justified <p>House extensions and replacement dwellings within the Green Belt:</p> <ul style="list-style-type: none"> • House extensions will be permitted which would not result in disproportionate additions to the original dwelling or harm the purposes of the Green Belt; and • Replacement dwellings should be positioned on or close to the
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			<p>footprint of the existing dwelling and will be permitted which are not materially larger than the one it replaces.</p> <p>Both within the Green Belt and beyond it account will be taken of the size of the existing dwelling, the extent to which it has previously been extended or could be extended under permitted development rights, and the character of the area.</p>
H4	Policy is too weak and doesn't prevent increasing built form in the countryside	The size of development within the Green Belt is guided by national policy. Beyond the Green Belt the proposed amended policy aims to ensure that the development does not materially increase the impact of the dwelling on the appearance of the surrounding countryside or the open character of the Countryside Protection Zone by virtue of its siting, scale, height, character and design.	See amended policy above
H4	Policy should also relate to development in the Countryside Protection Zone	Agree that the policy should also relate to the Countryside Protection Zone.	See amended policy above

Policy H5 Residential Development in Settlements without Development Limits and associated paragraphs 4.14

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
H5	Reference should be made to Essex Design Guide	Agree that reference should be made to the Essex Design Guide.	Policy H5 - Residential Development in Settlements without Development

	and garden sizes		<p>Limits</p> <p>Proposals for small scale residential development on sites in settlements without development limits will be permitted if the following criteria are met:</p> <p>a. The setting of existing buildings, the natural and historic environment, and the character of the area are protected;</p> <p>b. <u>A reasonable amount of amenity space is provided in accordance with the Essex Design Guide or subsequent design guidance; The resulting garden space is not unreasonably small;</u></p> <p>c. The development would not have an overbearing effect or cause disturbance to neighbouring properties;</p> <p>d. There would be no material overlooking or overshadowing of neighbouring properties; and</p> <p>e. The resulting development would not result in unreasonable noise and disturbance to the occupiers of neighbouring properties from vehicles or any other cause.</p>
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Policy H6 Affordable Housing and associated paragraphs 4.15-4.23

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
	Include reference to Independent Living	It is proposed to include a new policy on Specialist Housing and Care Homes for Older and Vulnerable People (see below) which will reference the Independent Living Programme	New policy on Specialist Housing (see below)

		being delivered by Essex County Council.	
4.23	Include reference to Neighbourhood Plan policies on Affordable Housing	Additional text about the role and status of neighbourhood plans is being included in Chapter 3	No change
4.23	Viability test should be the exception and not the rule. Explain how viability of sites will be assessed.	The Council needs to be certain that a development will be delivered. The Council's starting point is to require the percentage of housing as set out in the policy. If the applicants consider that this would make the scheme unviable it is their responsibility to commission a viability study which would be assessed by the Council's viability specialists. Generally viability assessments use the Residual Method of valuation which compares the purchase price with gross development value minus the costs of construction, fees, S106 agreements and profit. The scheme will be viable if the development provides a profit. It is not considered necessary or appropriate to explain this in the supporting text.	No change
H6	Policy should require affordable housing to be pepper-potted throughout the site.	The Council's approach is to have small clusters of affordable housing. This provides a mix of tenures	Additional text to policy <u>Affordable housing units will be distributed through the development in appropriately sized, non-contiguous clusters.</u>

	Set out and justify the number of affordable houses to be delivered.	<p>The West Essex and East Hertfordshire Strategic Housing Market Assessment Affordable Housing Update July 2017 updates the affordable housing analysis undertaken from the 2015 SHMA.</p> <p>The supporting text can be updated with reference to this document.</p>	See below – Changes to supporting text paragraphs 4.15 – 4.23
	Threshold of 11 houses should not apply to Type A and B villages.	<p>Planning Practice guidance on Planning Obligations Paragraph 31 does not allow contributions to be sought from developments of 10 units or less and which have a maximum combined gross floorspace of no more than 1,000 m2 (gross internal area).</p> <p>Why are we not referencing 1000m2? Both East Herts and Epping make reference. The practicalities of operating this could be set out in SPD</p>	<p>Amend Policy</p> <p>Developments on sites of <u>which provide for 11 dwellings or more, or residential floorspace of more than 1,000 sq m (combined gross internal area)</u>, will be required to provide 40% of the total number of dwellings as affordable dwellings on the application site and as an integral part of the development. <u>The Council will prepare a Supplementary Planning Document on Affordable Housing.</u></p>
4.21	Policy should make reference to Starter Homes	<p>The SHMA – Affordable Housing Update July 2017 states that the costs associated with Starter Homes can be notably higher than low cost home ownership and also much higher than median private sector rents, and therefore they are unlikely to be affordable to those household identified as being unable to afford market housing considered in the update. Nevertheless, the initiative could help to widen opportunities for homeownership for those households able to afford market rents but unable to afford to buy</p>	<p>Supporting text: <u>Starter Homes can help to widen opportunities for homeownership for those households able to afford market rents but unable to afford to buy housing in the Housing Market Area. The Council is supportive of the model and awaits the publication of the Regulations.</u> <u>The SHMA found that starter homes are unlikely to be affordable to those</u></p>

		<p>housing in the HMA.</p> <p>On this basis the SHMA recommends that the provision of Starter Homes are considered as being additional to (and not part of) the affordable housing need identified by this update.</p> <p>Propose to include text explaining the above.</p>	<p><u>households identified as being unable to afford market housing. The provision of Starter Homes are therefore considered as being additional to (and not part of) the affordable housing need.</u></p> <p>Include Starter Homes in Glossary as <u>'new dwellings only available for purchase by qualifying first-time buyers which is to be sold at a discount of at least 20% of the market value and for less than the price cap (of £250,000 outside Great London) and is subject to restrictions on sale or letting for the initial 5-year period of occupancy.'</u></p>
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Changes to supporting text paragraphs 4.15 – 4.23

4.15 As explained in the Spatial Strategy in Section 3 of the Local Plan, since 2010 the Council has worked with Harlow, Epping Forest and East Hertfordshire Councils to prepare a Strategic Housing Market Assessment (SHMA). A SHMA was published in 2010 and updated in 2012 and 2015. The ~~2015~~ 2017 SHMA sets out an up to date and policy-compliant assessment of housing need across the Housing Market Area (HMA) for the period 2011-2033. It identifies that the four districts represent the most appropriate “best fit” for the West Essex and East Hertfordshire HMA.

4.16 The 2015 SHMA ~~concludes~~ concluded that the combined level of housing need across the four local authority areas is was 46,058 homes for the period 2011-2033. This figure ~~has been~~ was disaggregated amongst the four authorities.

4.17 The Government released new household projections in July 2016. These figures showed that, by 2033, the population of Uttlesford is was likely to be greater than originally expected. Following the release of these figures, further interim work on the SHMA ~~has shown~~ showed that the level of housing need in the District ~~has had~~ increased to around 14,100 new homes by 2033. ~~The Local Plan provides for this higher figure of 14,100~~ This further work

following the new household projections did not include consideration of the affordable housing component of the SHMA. The 2017 SHMA has updated the affordable housing need.

4.18 The ~~2015~~ 2017 SHMA identified that the affordable housing component of the District's total housing need is ~~19.5%~~ 27%. In the light of national policy which does not permit affordable housing contributions from sites of 10 units or less, it is considered appropriate to require developments of 11 dwellings or more to provide 40% of the total number of dwellings as affordable dwellings in order to ensure that the affordable housing need is met. This included a current unmet affordable housing need across the HMA authorities of over 3,100 dwellings, of which Uttlesford has a proportion. ~~The 2015 SHMA identified the need for an 18% uplift of the baseline housing need across the HMA authorities, based on market signals. However, the identified OAHN already incorporates an uplift of more than 20% on the baseline household projections, which will contribute to increasing the supply of affordable homes through market housing led developments. The Inspector of the withdrawn 2014 Local Plan considered that an additional 10% uplift was reasonable for the District. It is considered that the 10% uplift figure remains appropriate.~~

4.19 There are, and will continue to be, many households in Uttlesford lacking their own housing or living in housing that is inadequate ~~adequate~~ or unsuitable, who are unlikely to be able to meet their needs in the housing market without some assistance.

4.20 For affordable housing to be relevant to those in housing need in Uttlesford it must be available, both initially and for subsequent occupancy, only to those with a demonstrable housing need.

4.21 The Council encourages meeting affordable housing requirements through one of its preferred Registered Providers (RP) who have the management abilities and local knowledge to effectively manage new affordable housing. Increasingly though there are a range of different types of affordable housing and developers and property managers as well as Registered Providers. The Council will consider a range of different types of affordable housing subject to it meeting the overall intention of affordable housing. Innovative affordable housing products and development designs will be supported particularly within the new garden communities.

Starter Homes can help to widen opportunities for homeownership for those households able to afford market rents but unable to afford to buy housing in the Housing Market Area. The Council is supportive of the model and awaits the publication of the Regulations.

The SHMA found that starter homes are unlikely to be affordable to those households identified as being unable to afford market housing. The provision of Starter Homes are therefore considered as being additional to (and not part of) the affordable housing need.

4.22 The percentage and type of affordable housing on any given site may be subject to negotiation at the time of a planning application, to allow issues such as site size, sustainability and viability to be considered. An appropriate mix of tenures and property size would need to be agreed in the light of the most up to date housing need evidence and will be determined by local circumstances. The Council will set out in its Developer Contributions Supplementary Planning Document ~~the most up to date tenure mix and~~ specific site layout and design requirements for affordable housing. Currently the

tenure split is ~~70%~~ 71% affordable rent or social rented tenure and ~~30%~~ 29% shared ownership or intermediate housing tenure. Affordable housing units will be normally be distributed throughout the development in clusters of no more than 10 units, depending on the size of the development.

4.23 Requirements for affordable housing provision can render some schemes unviable, especially when faced with a downturn in the housing market or changes to funding. The viability of schemes is a key consideration. It is the responsibility of the applicant to commission a viability study by specialists to be agreed with the Council to prove that the affordable dwellings requirement as set out in the policy will make their scheme unviable and to propose alternatives to meet the requirements set out in Policy H6 below

Policy H7 Affordable Housing on Exception Sites and associated paragraphs 4.24 – 4.25

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
4.24	Make reference to working with parish councils and Neighbourhood Plans	Agree	Supporting text: <u>The District Council will work with Registered Providers, Parish Councils and Neighbourhood Plan Groups in identifying suitable sites.</u>
H7	Make sure policy is not unreasonably restrictive or too flexible.	The NPPF defines Rural Exception Sites as Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. Small numbers of market homes may be allowed at the local authority's discretion, for example where essential to enable the delivery of affordable units without grant funding. This policy updates the adopted policy in line	Policy H7 - Affordable Housing on Exception Sites Development of affordable housing will be permitted outside settlements on a site where housing would not otherwise normally be permitted, if it meets all the following criteria: <ul style="list-style-type: none"> The development will meet a demonstrable local need that cannot be met in any other way, <u>as demonstrated by an up to date housing needs survey prepared within the last three years;</u>

		<p>with the NPPF.</p> <p>Bullet point 1: These developments are being permitted on sites which otherwise would not be permitted. It is therefore reasonable that a local need is demonstrated. This is done through the housing needs survey which identifies any need and the scale of that need. It is proposed to combine bullet points 1 and 4.</p> <p>Bullet point 2: it necessary for the scale rural exception scheme to be relative to the settlement.</p> <p>Bullet point 3: It is important for the residents of the housing to have easy access to the services and facilities of the village and it is therefore important for the sites to adjoin the village.</p> <p>Bullet Point 4: The housing needs survey demonstrates the need, scale and tenure of the housing. It is proposed to combine this point with point 1.</p> <p>The NPPF allows for the provision of limited market housing. The policy ensures that the need and scale of the market housing is demonstrated.</p>	<ul style="list-style-type: none"> • The development is of a scale appropriate to the size and facilities of the settlement; • The site adjoins the settlement; and • There is an up to date housing needs survey prepared within the last three years. <p>The inclusion of market housing in such schemes will be supported provided that:</p> <ul style="list-style-type: none"> • Viability assessments demonstrate that the need for the market housing component is essential for the successful delivery of the development; and • The proportion of market housing is the minimum needed to make the scheme viable.
4.25			<p>Paragraph 4.25: Such people may for example, include <u>existing residents</u> who need separate accommodation locally, key workers or people who have</p>

			longstanding links with the local community, such as people who used to live in the village but were forced to move away because of a lack of affordable housing, people who need to move away because of a lack of affordable housing and people who need to move back into a village to be near relatives.
4.25			<p>Insert new paragraph</p> <p><u>Community Land Trusts (CLTs) are recognised as one potential arrangement to deliver, own and manage the provision of affordable housing including discounted market sale and intermediate homes to rent or buy. The Council supports the development of CLTs to meet local housing needs. As corporate bodies, CLTs must satisfy conditions within relevant legislation and furthermore should be willing to enter into planning obligations to secure the future affordability and occupancy of any dwellings they provide.</u></p>

Policy H8 Self Build and Custom Build Housing and associated paragraphs 4.26 – 4.30

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
	How will policy be implemented in practice?	Information from the register will be a material consideration in determining a planning application and will be considered alongside the	Delete policy D7 and supporting text and incorporate into new policy H8 and new supporting text

		<p>relevant policies.</p> <p>The policy will be relevant both to applications solely for self/custom build housing but also where such housing forms part of a larger housing scheme increasing the mix of housing types.</p> <p>Currently policy D9 in the design chapter also deals with self-build homes. It is considered that this should be amalgamated with policy H8 so that self-build homes are covered in one place in the plan. This will assist the reader.</p>	See below
	Policy should identify other factors which will be taken into account	Applications will be determined in accordance with other policies in the plan such as Strategic Policies on Development with in Development Limits; Protection of the Countryside; Sustainable Development Principles, and policies on Design and Environment	No change
<p>Self-Build and Custom Build Housing</p> <p><u>Paragraph 50 of the NPPF makes it clear that Local Planning Authorities should identify and make provision for people wishing to build their own home. Enabling self and custom building provides an important opportunity to bring more choice into the housing market and enable people to design and build homes that meet their specific needs.</u></p> <p><u>Self or custom build housing is identified as dwellings built (or commissioned) by someone to be occupied by them as their sole or main residence for at least three years. The three years is relevant in terms of qualifying for self-build Community Infrastructure Levy (CIL) exemption.</u></p> <p><u>The Self and Custom Housebuilding Act 2015 requires each Local Planning Authority to keep a register of individuals and associations of individuals who are seeking to acquire serviced plots of land in the authority area in order to build houses for those individuals to occupy as homes. The self-build register also provides information about the demand for such housing. This evidence should then be used to inform the Local Plan, consideration of planning applications and the disposal of public land.</u></p> <p><u>The Council considers that self and custom build schemes have a number of advantages that can complement traditional housing delivery models.</u></p>			

A key benefit of self-build and custom-build schemes is their ability to offer an effective way to increase the mix of housing types and tenures. Schemes also have the potential to increase the delivery of innovative and highly sustainable developments in a cost-effective manner.

The Council will work with developers on sites where the delivery of serviced plots for affordable housing are negotiated to enable some of these to be offered for self-build where a need is identified.

Community Land Trusts (CLTs) are recognised as one potential arrangement to deliver, own and manage the provision of self-build schemes. can provide an opportunity for affordable self-build schemes. CLTs are non-profit, community-based organisations run by volunteers that develop housing, workspaces, community facilities or other assets that meet the needs of the community, are owned and controlled by the community and are made available at permanently affordable levels. The Council supports the development of CLTs to meet local housing needs. As corporate bodies CLTs must satisfy conditions within relevant legislation and furthermore should be willing to enter into planning obligations to secure the future affordability and occupancy of any dwellings they provide.

The Council further recognises the opportunity of custom and self-build housing partly satisfying the affordable housing obligations from a residential development. Self-build development can provide for intermediate housing for rent or sale but would be subject to applying affordability and eligibility criteria. Several alternatives can be used to secure delivery. These include providing a specific number of fully serviced plots or homes that can be partly built out to be self-finished by purchasers. In all cases, these should be made available to households in housing need with a relevant local connection and provided for sale or rent at an appropriate discount below market value. Affordable self-build properties should meet the definition for affordable housing provided by the Local Plan and Annex 2 of the NPPF: for people who cannot afford to buy or rent a home on the open market.

Support for this growing sector can make a positive contribution to development within the District. Where areas of land are identified for self-build, either as part of a strategic development site, new garden community, or through other smaller scale or windfall development, good design principles will apply.

Masterplans and plot passports should be prepared that provide the parameters within which these new homes can be designed and built, allowing for individual interpretation, but within a framework that established the grain scale and rhythm of new development.

Plot Passports are a summary of the design parameters for any given plot, helping private homebuilders understand what they are allowed to build on the plot. They capture key information from the planning permission for the site, design constraints and procedural requirements. The passports clearly show permissible building lines within which the new dwelling can be built, as well as height restrictions and other details such as parking requirements. Aspects such as materials, roof styles and fenestration are usually left for the plot owner to decide.

Policy H8 – Self-Build and Custom Build Housing Units

Self and Custom Build proposals will be supported where they seek to address the need and demand for self and custom build housing and:

- **the site is located within Development limits;**
- **are of high quality design and accord with plot passports (where appropriate);**
- **are constructed sustainably and are energy efficient;**
- **do not conflict with other policies in the local plan.**

Self and Custom Build proposals will be supported as part of the Garden Communities and strategic sites.

Where land is proposed for self and custom build plots located within Garden Communities and strategic sites, a design code and individual plot passports should be prepared and submitted to the Council for approval. Together, these will regulate the form of development, establishing building parameters such as heights, footprints, set-backs, densities and parking requirements.

Neighbourhood plans may designate self and custom build sites where demand is identified.

In line with identified demand, a proportion of the self-built plots should be provided as affordable housing. These should be provided:

- **at an appropriate discount below market value; and**
- **to households in housing need with a relevant local connection.**

If Self or Custom Build plots are not sold after being marketed appropriately for 24 months, then they then should remain on the open market as Self or Custom Build plots or be offered to the Council as land to deliver additional affordable housing. If there is no interest from the above after 12 months then the developer can build out the site as open market housing.

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
4.35 4.36	Need to clearly identify what the needs are and is approach of criteria policy sound.	<p>A joint Essex, Southend on Sea and Thurrock Gypsy and Traveller Accommodation Assessment has been prepared. It comprises a Joint Methodology (January 2018); Summary (January 2018) and Need Summary report for each Local Authority. In summary the Uttlesford Assessment found that there is a need for no additional pitches over up to 2033 for Gypsy and Traveller household that meet the planning definition contained in the Planning Policy for Travellers Sites; a need for up to 8 additional pitches for Gypsy and Traveller households that may meet the planning definition; and a need for 10 additional pitches for Gypsy and Traveller households who do not meet the planning definition. No needs for travelling showpeople were identified. The Council is working with the other Councils in Essex to identify the need the appropriate location for transit provision.</p> <p>The Council is confident in the robustness of these reports.</p> <p>Changes to the text are proposed to clarify the situation.</p>	<p>4.35 In partnership with the <u>neighbouring Councils across Essex, Southend-on-Sea and Thurrock</u>, the District Council commissioned the Gypsy and Traveller Accommodation Assessment (GTAA) (2016) to provide a robust assessment of current and future need for gypsy and traveller and travelling Showpeople families. <u>The latest GTAA was published in January 2018 and the baseline for the Uttlesford Study is 2016.</u></p> <p>4.36 A total of 16 15 interviews were completed with Gypsies and Travellers and a further 1 was completed with Travelling Showpeople living on authorised and unauthorised sites and yards.</p> <p>The GTAA identified that in the District there is a need for <u>no additional pitches over up to 2033 for Gypsy and Traveller household that meet the planning definition contained in the Planning Policy for Travellers Sites; a need for up to 8 additional pitches for Gypsy and Traveller households that may meet the planning definition; and a need for 10 additional pitches for Gypsy and Traveller households who do not meet</u></p>

			<p>the planning definition. <u>No needs for travelling showpeople were identified. The Council is working with the other Councils in Essex to identify the need and the appropriate location(s) for transit provision.</u> are 39 'unknown' households that may meet the new definition of traveller and 15 households that do not meet the new definition. There was an additional need for 10 net pitches arising from the gypsy and traveller community that do not meet the gypsy and traveller definition under the PPTS. There is one 1 Travelling Showperson household identified in the District and details from the interview showed that there is no current or future need. There was an identified need for 8 net additional pitches for 'unknown' households. It cannot be determined if these families fall under the definition of gypsy and traveller under the PPTS or not.</p>
	<p>Need for further evidence on needs of those who no longer meet definition for planning policy purposes.</p>	<p>Although not a requirement, the GTAA does address the pitch needs of those who do not meet the planning definition as set out in the District Summary for Uttlesford. It concludes that the total additional need is for 10 pitches over the plan period.</p>	<p>No change</p>
	<p>Formally requested to evaluate evidence to determine whether there is the potential to assist in meeting the unmet need in Basildon for Traveller</p>	<p>On Thursday 22 March Basildon Council agreed to proceed with the publication of its Publication Local Plan for a Reg 19 consultation in the</p>	<p>No change</p>

	<p>pitches prior to progressing Local Plan to Regulation 19.</p>	<p>summer. The Publication Local Plan intends to meet its Gypsy, Traveller and Travelling Showpeople accommodation need of 53 Gypsy and Traveller pitches and 3 Travelling Showpeople plots in full. This is set out in Policy H3 of the Publication Local Plan.</p> <p>Assuming there are no further changes post Reg 19 consultation, it is therefore the intention of Basildon Council to meet its Gypsy, Traveller and Travelling Showpeople needs in full until 2034 within the Borough, noting however that further work is required to establish the transit needs in Essex; a separate study for which is due to be commissioned by the EPOA in 2018/2019.</p>	
H9	<p>Sustainability Appraisal</p> <p>It is recommended that the Policy is expanded to indicate what would and would not be suitable in any forthcoming applications regarding flood risk, in response to the significance of impacts that flooding can have on this specific form of accommodation.</p>	<p>In their representation on this policy the Environment Agency supported the inclusion of the 5th bullet point requiring the site not to be located in an area of risk of flooding and refer to Table 2 of the Planning Practice Guidance which classifies Caravans as highly vulnerable. Amend policy to reflect national guidance.</p>	<p>Policy H9</p> <ul style="list-style-type: none"> The site is not located in an area at risk of flooding <u>Flood Zone 3 and passes the Exception Test if the site is located in Flood Zone 2;</u>

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

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
4.40	Include reference to Independent Living	Agree to including supporting text suggested by Essex County Council	Paragraph 4.40 Uttlesford has an ageing population which has clear implications for the

		<p>It is further considered that the policy could be renamed for clarity.</p>	<p>future delivery of housing over the Local Plan period. <u>Essex County Council is the provider of social services in the District. Its Independent Living Programme is encouraging the provision of specialist accommodation in Essex as a means by which older people can continue to live healthy and active lives within existing communities. For Uttlesford District, ECC has set the target of delivering 73 additional units of specialist accommodation (33 through rental and 40 through ownership) to enable older people to live independently within the community by 2020. This target is set out in Essex County Council's Independent Living Position Statement (2016). This approach to meeting the specialist accommodation needs of older people is intended to reduce the demand for residential/nursing home care, which is a considerably more expensive way of meeting the needs of older people, and can unnecessarily restrict independence within this age group</u></p> <p>Rename policy to “Accessible and Adaptable Homes for older people and wheelchair users”</p>
H10	Evidence supporting the policy is required	The evidence for this policy is set out in the West Essex and East Hertfordshire Strategic Housing	No change

		Market Assessment September 2015. Paragraphs 6.25 to 6.34 consider Households with Specific Needs. The requirement for 10% of market housing and 15% of affordable housing to meet category 3 requirements takes into account current disability data and recognises the changing demographics of the area and provides an element of choice for households that need wheelchair user dwellings now as well as those households considering how their needs may change in the future.	
H10	Consider increasing the types of sites the policy applies to – The percentage for category 3 should be 15% for both market homes and affordable homes.	The West Essex and East Hertfordshire Strategic Housing Market Assessment September 2015. Paragraphs 6.34 draws on disability data to show that wheelchair users are notably higher for households living in affordable housing. It is therefore justified for the policy to differentiate between market and affordable housing.	No change
	Policy for delivery of C2 class uses and specialist housing required	<p>The 2011 Census identified 1148 people living in Communal Establishments in Uttlesford. The SHMA (2015) identifies the projected growth in population aged 75 or over living in communal establishments in the District as 542 persons between 2011 and 2033.</p> <p>Agree that the Council is lacking a policy on specialist Housing.</p>	<p>New text and policy <u>Specialist Housing and Care Homes for Older and Vulnerable People</u></p> <p><u>Some people, such as the elderly or disabled, may need specialist housing provision, which is specially designed for their needs. This can include extra care, sheltered and registered care homes for the elderly and disabled, as well as any other facilities for the homeless or those escaping violence. These uses generally fall within the C2 residential institutions or in some cases C3 dwelling homes use class and this is</u></p>

			<p><u>determined usually by the amount of care available on site and whether the units are self contained.</u></p> <p><u>Many of the considerations for specialist housing will be similar to those of general housing, and development will need to take into account all relevant policies in this plan but each use will have specific needs. For example, elderly or disabled accommodation should provide storage and charging points for wheelchairs/mobility scooters; whilst those accommodating children should have appropriate indoor and outdoor play space. In all cases, residents are less likely to have access to a private vehicle and so the nearby provision of shops and services is essential, in addition to good public transport links for trips further afield.</u></p> <p><u>Policy HXX Specialist Housing</u> <u>Specialist housing is defined as accommodation, which has been specifically designed and built to meet the needs of the elderly, disabled, young or vulnerable adults, and may include some elements of care and support for everyone who lives there.</u></p> <p><u>Proposals for specialist housing will be</u></p>
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			<p><u>permitted within development boundaries providing that all the following criteria are met:</u></p> <ul style="list-style-type: none">• <u>Everyday services that users would expect to access, such as shops and health services should be available on site or should be located close by and be able to be accessed by a range of transport modes</u>• <u>Parking should be provided in line with the Council's approved standards</u>• <u>There is an appropriate level of private amenity space to meet the needs of residents</u> <p><u>Sites beyond developments limits will be favourably considered if in addition to the above criteria</u></p> <ul style="list-style-type: none">• <u>The site adjoins a settlement</u>• <u>The setting of existing buildings, the natural and historic environment and the character of the area are protected</u>• <u>The development would not have an overbearing effect or cause disturbance to neighbouring properties</u>• <u>There would be no material overlooking or overshadowing of neighbouring properties.</u>
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Uttlesford District Council – Proposed Response

Chapter 5: Employment

Paragraphs 5.1 – 5.3 Introduction

Added text – shown underlined

Deleted text – shown crossed out or struck through

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
5.1-5.3	Change “in association with new garden communities” to read “as an integral part of garden communities”	Noted, agree the Garden Community Principles set out how important a wide range of local jobs within easy commuting distance of homes is. Amend the text to reflect this.	Amend the text to the following: “in association with new garden communities <u>as an integral part of garden communities”</u> .
5.1-5.3	Not enough local business or employment opportunities to match the proposed housing. Job shortfall.	Noted West Essex and East Hertfordshire Assessment of Employment Needs 2017, applies an adjustment to seek to balance the labour market and ensure that commuting levels remain at 2011 levels. Employment in the district is set to rise in the plan period by 33,100 jobs over the plan period of 2011-33. NOMIS data indicates that between 2004 and 2017 that	No Change Required

		<p>the number of jobs in the district have grown by 10,000 over a sustained period of growth, only dipping slightly in the middle of this period which could directly be attributable to the global financial crisis and subsequent economic slowdown / recession.</p> <p>However, there will be a percentage of the population that choose to live in the district and commute to other places for work. The employment study calculates that retaining the out-commuting rate at the 2011 level would mean that 38.2% of workers would still be commuting out of the district to their place of work.</p>	
5.1-5.3	<p>The three proposed garden communities attracting high skilled and high paid workers is not derived from the current trends on reliance of commuting. Cohesive policy needed to attract good quality companies and reduce the need for travel, rather than construct new commuter towns.</p>	<p>Noted. The Garden communities will provide a wide range of employment opportunities from jobs in schools and shops, to those in offices. This will ensure that the Garden Communities do not rely on high levels of commuting.</p>	<p>No Change Required</p>

<p>5.1- 5.3</p>	<p>Concern around the increase in employment numbers at Stansted airport which are main reason for new housing development.</p>	<p>Noted. In fact it is the employment forecasts that have been adjusted upwards to balance with the homes being provided across the SHMA / FEMA area.</p> <p>The 2017 Employment Study (West Essex and East Hertfordshire Assessment of Employment Needs 2017) moderated baseline job forecast identified job growth of 33,100 across the Functional Economic Market Area (FEMA area) (East Herts, Epping Forest, Harlow & Uttlesford). When this job growth was compared with the housing growth (and labour supply) in the 2017 SHMA (West Essex and East Hertfordshire Strategic Housing Market Assessment) it was apparent that the level of workforce growth was far beyond that required to meet the jobs growth. To maintain a balanced labour market, with an appropriate level of unemployment and commuting patterns in line with 2011 rates, would necessitate a further 20,000 jobs over and above the</p>	<p>No Change Required</p>
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		<p>moderated baseline.</p> <p>On this basis it is appropriate to consider whether higher employment growth scenarios could be developed. Four major drivers of additional job growth, over and above the moderated baseline were identified from the evidence review:</p> <ul style="list-style-type: none">- The relocation of Public Health England to Harlow, creating an additional 3,250 jobs in the area above the moderated baseline;- The planned growth of Stansted Airport, creating an additional 6,750 jobs in the area above the moderated baseline;- The economic development efforts at Harlow, including the Enterprise Zone, creating an additional 2,500 jobs in the area above the moderated baseline; and- The service sector employment implications of higher population projections, creating an additional 5,400 jobs in the area above the moderated baseline.	
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5.1-5.3	Many new employment sites identified are small and focus on Chesterford Park and Stansted Airport. Identifying larger sites should be a priority to attract larger businesses.	Noted. Chesterford Research Park and the North side allocation at Stansted Airport allow for the development of larger scale premises that can attract larger businesses. Other smaller allocations allow for a range of new business premises to be developed.	No Change Required
5.1-5.3	How to build footfall and average spend in a towns like Thaxted with a with diminished industry and agricultural land being utilised for housing	Noted. Within Thaxted, the majority of the town's economy is centred on the service sector to the local population and tourists. The plan seeks to protect the loss of employment sites to other uses t retain a diverse supply of jobs in the villages of Uttlesford, including Thaxted.	No Change Required

Uttlesford District Council – Proposed Response

Chapter 5: Employment

Paragraphs 5.4-5.10

Added text – shown underlined

Deleted text – shown crossed out or struck through

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
5.4-5.10	Paragraph 5.4 appears to restrict development within existing and proposed employment areas to Class B uses. These restrictions are unnecessary and	Noted. As the paragraph makes clear, references to employment land within this chapter is referring to B use class land, i.e. offices, R&D, industry and storage and distribution. Other areas of the plan	No Change Required

	<p>are likely to prohibit sustainable employment generating development, which may otherwise be delivered. Policies EMP2 and EMP1 and the supporting text at paragraphs 5.46 and 5.4 as drafted are not compatible with National Planning Policy set out in the NPPF and do not represent the most appropriate approach. Consequently, the draft Local Plan remains unsound in the context of paragraph 182 of the NPPF and requires amendment as below, to address our objections. Para 5.4 - Revise to include: 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</p>	<p>address and support the other economic functions within the district such as retail, leisure and agriculture.</p> <p>We have to protect these spaces to meet the long term employment need. However, EMP2 has flexibility built into bullet point 3 which states that “Where an applicant is able to provide demonstrable proof...”.</p>	
5.4-5.10	<p>The ELR seems to be based upon a direct link between population growth and employment requirement. This takes no account of expansion requirements of existing business or inward migration (e.g. from NE London or Harlow) of businesses looking to locate in the District. Local agents, have advised respondents that through many enquiries they receive, that urgent provision of sites is needed now to meet a known demand</p>	<p>Noted. The local plan references that the ELR identifies the amount of employment land and floorspace needed during the plan period and makes recommendations as to where it should be located within the district. The forecasts are not specific but do take into account wider factors than population growth, for example businesses relocating. The methodology used to determine these forecasts is appropriate and proportionate, and compliant with the requirements of the NPPF and the PPG.</p>	No Change Required
5.4-5.10	<p>Timeframes for the delivery of the floorspace figures quoted under Paragraph 5.7 should be specified, given that UDC has a vested interested in the delivery of the site.</p>	<p>Noted. The timeframe for this expansion will be for delivery within the plan period of up to 37,000 sqm of B1 (b) use employment space in Chesterford Research Park. With the remainder to be delivered beyond the 2033.</p>	No Change Required
5.4-5.10	<p>Predicted 900 jobs at Great Chesterford Research Park should not be used as a justification for the allocation of North Uttlesford Garden Village (NUGV).</p>	<p>Noted. The allocation of North Uttlesford Garden community is not solely justified on the job opportunities at Chesterford Research Park. Nevertheless, the fact that there are substantial employment opportunities easily accessible from North Uttlesford Garden</p>	No Change Required

		Community is a point in its favour.	
5.4-5.10	Whether the risk posed by Brexit and the impact this will have on employment and housing need has been considered.	Noted. The policies in the plan are based on our current evidence base and are subject to review if circumstances change. At this point in time the economic impacts of Brexit are not known and so cannot be taken into account.	No Change Required

Uttlesford District Council – Proposed Response

Chapter 5: Employment

Paragraphs 5.11-5.15

Added text – shown underlined

Deleted text – shown crossed out or struck through

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
5.11-5.15	The difference of 10 JPA between the Medium and High Growth scenario's is doubtful and 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.	Noted. The 2017 Employment Study (West Essex and East Hertfordshire Assessment of Employment Needs 2017) moderated baseline job forecast identified job growth of 33,100 across the Functional Economic Market Area (FEMA area) (East Herts, Epping Forest, Harlow & Uttlesford). When this job growth was compared with the housing growth (and labour	No Change Required

		<p>supply) in the 2017 SHMA (West Essex and East Hertfordshire Strategic Housing Market Assessment) it was apparent that the level of workforce growth was far beyond that required to meet the jobs growth. To maintain a balanced labour market, with an appropriate level of unemployment and commuting patterns in line with 2011 rates, would necessitate a further 20,000 jobs over and above the moderated baseline.</p> <p>On this basis it is appropriate to consider whether higher employment growth scenarios could be developed. Four major drivers of additional job growth, over and above the moderated baseline were identified from the evidence review:</p> <ul style="list-style-type: none">- The relocation of Public Health England to Harlow, creating an additional 3,250 jobs in the area above the moderated baseline;- The planned growth of Stansted Airport, creating an additional 6,750 jobs in the area	
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		<p>above the moderated baseline;</p> <ul style="list-style-type: none"> - The economic development efforts at Harlow, including the Enterprise Zone, creating an additional 2,500 jobs in the area above the moderated baseline; and - The service sector employment implications of higher population projections, creating an additional 5,400 jobs in the area above the moderated baseline. 	
5.11-5.15	The figures provided are broad assumptions without evidence.	<p>Noted. The figures provided are calculated using evidence based data. The East of England Forecasting Model (EEFM) provides consistent economic forecasts for the whole of the East of England region and selected other areas. The EEFM was originally developed by Oxford Economics with its first release in 2007 and regular updates to 2014. The latest 2016 release has been prepared by Cambridge Econometrics after a retendering of the contract. The Employment evidence uses a moderated baseline of the 2016 EEFM forecasts as a starting position to forecast employment growth</p>	No Change Required.

		in the district.	
5.11-5.15	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.	<p>Noted. The jobs allocation in the G2 application is based on a scheme that is no longer being promoted.</p> <p>The 2017 Employment Study (West Essex and East Hertfordshire Assessment of Employment Needs 2017) moderated baseline job forecast identified job growth of 33,100 across the Functional Economic Market Area (FEMA area) (East Herts, Epping Forest, Harlow & Uttlesford). When this job growth was compared with the housing growth (and labour supply) in the 2017 SHMA (West Essex and East Hertfordshire Strategic Housing Market Assessment) it was apparent that the level of workforce growth was far beyond that required to meet the jobs growth. To maintain a balanced labour market, with an appropriate level of unemployment and commuting patterns in line with 2011 rates,</p>	No Change Required

		<p>would necessitate a further 20,000 jobs over and above the moderated baseline.</p> <p>On this basis it is appropriate to consider whether higher employment growth scenarios could be developed. Four major drivers of additional job growth, over and above the moderated baseline were identified from the evidence review:</p> <ul style="list-style-type: none">- The relocation of Public Health England to Harlow, creating an additional 3,250 jobs in the area above the moderated baseline;- The planned growth of Stansted Airport, creating an additional 6,750 jobs in the area above the moderated baseline;- The economic development efforts at Harlow, including the Enterprise Zone, creating an additional 2,500 jobs in the area above the moderated baseline; and- The service sector employment implications of higher population projections, creating an additional 5,400 jobs in the area above the	
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		moderated baseline.	
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Uttlesford District Council – Proposed Response

Chapter 5: Employment

Paragraphs 5.18-5.21

Added text – shown underlined

Deleted text – shown crossed out or struck through

Ref	Key Issue (from overarching summary)	Council’s Response	Change to the plan
5.18-5.21	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.	Noted. As per the local plan draft. There is surplus warehouse space at Stansted Airport. As it is within the curtilage of the airport, these buildings, policy mitigates against them being used for anything other than airport use, apart from those at the Northside allocation, on Bury Lodge Lane. The proposed allocation at Northside is not restricted to airport-related employment as the site is not needed for airport related uses and is a brownfield site well located in terms of access to the strategic road network and	No change.

		<p>Stansted Airport.</p> <p>The constructed phase of the Taylors Way End way is now in private ownership, having been disposed of via BAA.</p>	
5.18-5.21	<p>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.</p>	<p>Noted. The units are in private ownership and can be let only for airport related business due to planning conditions currently place on all buildings within the airport curtilage. The reason for these conditions is to ensure there is appropriate space available to support the airport.</p>	<p>No Change.</p>
5.18-5.21	<p>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</p>	<p>Noted. There are improvement measures planned for the M11 at junction 8 to mitigate the congestion experienced there. Refer to Transport Chapter 7 of the local plan. These works consist of a funded proposal for interim works to the junction to provide a solution for short / medium term capacity. The airport will make a proportionate contribution.</p>	<p>No Change.</p>
5.18-5.21	<p>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.</p>	<p>Noted. Responses to representations in chapter 7 deal with traffic flow and access into Saffron Walden. Responses to representations in chapter 10 deal with air quality impacts in</p>	<p>No Change.</p>

		Saffron Walden.	
5.18-5.21	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.	Noted	No Change.

Uttlesford District Council – Proposed Response

Chapter 5: Employment

Paragraphs 5.24-5.27

Added text – shown underlined

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Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
5.24-5.27	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);	Noted. The inset map will be amended accordingly	Amend Saffron Walden Inset Map
5.24-5.27	The boundary of the Saffron Walden Business Centre should be expanded to include the Homebase store.	Policy EMP2 Considers existing and proposed employment uses, defined as offices, warehouses, industrial and auxiliary B-class employment supporting 'sui generis' uses. The Homebase site does not sit within these uses so should not be covered by this policy. Chapter 6 covers retail policies.	No Change to Plan.

Uttlesford District Council – Proposed Response

Chapter 5: Employment

Paragraphs 5.28

Added text – shown underlined

Deleted text – shown crossed out or struck through

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
5.28	Where is the latest monitoring data?	The Monitoring data for April 2016 NON RLA has not been published.	Update section 5 of the plan with the latest data.

Uttlesford District Council – Proposed Response

Chapter 5: Employment

Paragraphs 5.29

Added text – shown underlined

Deleted text – shown crossed out or struck through

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
5.29	What information is there on the number of people working from home and how this maybe supported, as this can help reduce traffic.	Appendix 2 of the West Essex and East Hertfordshire Assessment of Employment Needs Study 2017 sets out the homeworking assumptions used in the translation of the employment forecasts into land requirements. Across all industry this is 12%, as based on the 2011 Census.	No change to the plan.

		The Council is proposing a policy on the provision of high quality communications infrastructure and superfast broadband. This infrastructure will support homeworking, having the potential to ease traffic pressures.	
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Uttlesford District Council – Proposed Response

Chapter 5: Employment

Paragraph 5.31

Added text – shown underlined

Deleted text – shown crossed out or struck through

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
5.31	What information is there on the number of people working from home and how this maybe supported, as this can help reduce traffic.	Appendix 2 of the West Essex and East Hertfordshire Assessment of Employment Needs Study 2017 sets out the homeworking assumptions used in the translation of the employment forecasts into land requirements. Across all industry this is 12%, as based on the 2011 Census. The Council is proposing a policy on the provision of high quality	No change to the plan.

		communications infrastructure and superfast broadband. This infrastructure will support homeworking, having the potential to ease traffic pressures.	
5.31	Object to the latest proposals for their site at Elsenham in the Regulation 18 Local Plan (the current draft Local Pan). The current draft Local Plan only identifies a small and incomplete part of the overall site as an employment site (policy EMP1) rather than the site as a whole, which was shown in previous versions of the Plan. The property is referred to throughout the draft plan as either Elsenham Industrial Estate or Gaunts End.	<p>Noted – however the development for the Tri-Sail Towers Site was given planning permission (UTT/1473/11/FUL) in April 2012 and nothing other than groundworks have taken place on the site since. Furthermore, the majority of the development would be surplus to requirements under current projections.</p> <p>The Sustainability Appraisal of this site identifies a number of problems with allocating the site, including proximity to water bodies, sensitivity of landscape to change, TPOs, the site is greenfield and within the CPZ.</p>	No Change to Plan.

Chapter 5: Employment

Paragraphs 5.32-5.33

Added text – shown underlined>

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Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
5.32-5.33	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.	<p>Noted. The 'Vision Stansted' (Land West of Bedlar's Green, Great Hallingbury) site is situated within the CPZ (Countryside Protection Zone) and is therefore deemed unsuitable for development for employment purposes as it fails to meet key allocation criteria.</p> <p>There are variations in the contribution that different parcels in the study area make to CPZ purposes. However, this study has demonstrated that the majority of the CPZ is performing well against the purposes defined for it. The CPZ helps to maintain the openness of the countryside and protects its rural character and restrict the spread of development from the airport. For some parcels, particularly to the south of the airport, the CPZ</p>	No Change

		<p>plays an essential role in protecting the separate identity of individual settlements. In summary, therefore, the CPZ is helping to maintain the vision of the 'airport in the countryside'.</p> <p>It is in review of these findings that the council has selected the sites allocated in this local plan and have decided to enforce the CPZ rigorously to protect the countryside around Stansted from further erosion.</p>	
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Uttlesford District Council – Proposed Response

Chapter 5: Employment

Paragraph 5.34

Added text – shown underlined

Deleted text – shown crossed out or struck through

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
5.34	There has been no consideration of employment opportunities at all in Thaxted e.g. retail, office.	Thaxted is designated as a Key Village and Key Villages are identified as a major focus for development in the rural areas –	No Change Required.

		<p>suitable for a scale of development that would reinforce their role as provider of services to a wide rural area. However, within Thaxted, there are limited opportunities for new employment and retail. The majority of employment within the town is in service to the local population and tourists. Policies in chapter 5 and 6 seek to protect existing employment and retail uses in villages within the district.</p>	
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Uttlesford District Council – Proposed Response

Chapter 5: Employment

Paragraph 5.35

Added text – shown underlined

Deleted text – shown crossed out or struck through

Ref	Key Issue (from overarching summary)	Council’s Response	Change to the plan
5.35	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.	Noted. Change 5.35 to indicate that there should be a wide range of local jobs within easy commuting distance of homes as per the TCPA garden community principles.	<p>Add the following sentence:</p> <p><u>“In accordance with TCPA guidelines, Garden Communities will have a wide range of local jobs within easy commuting</u></p>

			<u>distance from homes.”</u>
5.35	Unlikely that genuine employment will materialise in developer-led artificial settlement as suggested;	<p>Noted. The Garden Community Principles are an integral part of the development of Garden Communities. Without appropriate, robust planning for local employment opportunities the proposals will be refused.</p> <p>The Council will be developing economic strategies for the three Garden Communities; these strategies will inform the appropriate employment opportunities to be developed.</p>	No Change.
5.35	Delivery of employment will be long after delivery of housing and infrastructure	Noted. Disagree, the timely provision of local employment opportunities are essential to the successful delivery of Garden Communities.	No Change.
5.35	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.	Noted. The Council will be developing economic strategies for the three Garden Communities; these strategies will inform the appropriate employment opportunities to be developed.	No Change

Uttlesford District Council – Proposed Response

Chapter 5: Employment

Paragraph 5.36

Added text – shown underlined

Deleted text – shown crossed out or struck through

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
5.36	<p>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.</p>	<p>Noted. Land at the Airport has previously been identified specifically for development directly related to or associated with the airport. The role and function of the airport, however, has changed evolved with a greater emphasis on proportion of short-haul flights. These flights are now the mainstay of London Stansted with planes spending relatively little time on the ground and with the focus on carrying passengers and have limited cargo handling capability rather than cargo. Therefore, few facilities are required for cargo storage pending trans-shipment resulting in little demand to take up the space reserved for airport related uses identified in the adopted Uttlesford Local Plan for the Northern Ancillary Areas of the airport. As a result, much of the land to the north of</p>	No Change

		<p>the runway in the Northern Ancillary Area is unused or underused and new commercial units built on a speculative basis to the south of the runway have been empty subject to long and / or frequent periods of vacancy since they were completed. This makes the 43ha site ideal for allocation for non-airport related B uses subject to the proposals having a comprehensive development brief or masterplan which shall set out the phases of the development.</p>	
5.36	<p>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.</p>	<p>Noted. Noted. This plan is now not going ahead as the site did not fulfil the needs of this operator.</p>	<p>No Change.</p>
5.36	<p>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.</p>	<p>Noted. Since 1991 (when the north side terminal at Stansted closed) The North Side has proven to be surplus to needs. This site is appropriate as the employment land study identifies that the council should promote and encourage the efficient use of employment land within the Airport boundary, including the de-designation of</p>	<p>No Change.</p>

		areas within the Northern Ancillary area, which are currently underutilised as a result of restrictions on non-aviation related uses	
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Uttlesford District Council – Proposed Response

Chapter 5: Employment

Paragraph 5.37

Added text – shown underlined

Deleted text – shown crossed out or struck through

Ref	Key Issue (from overarching summary)	Council’s Response	Change to the plan
5.37	There is a conflict of interest with Uttlesford District Council having purchased a 50% share of the holding of the site and the site at North Uttlesford has subsequently been allocated.	<p>Noted. The planning functions of the Council are separate from the investment and estate management functions of the Council. Uttlesford District Council, when coming to any planning judgements, the Council is not allowed to, and will not, take into account the finances of the Council.</p> <p>The proposal to allocate land at North Uttlesford for a Garden Community is part of the statutory planning functions of the Council. Local Plan</p>	No Change to Plan

		proposals and decisions must be based on valid planning considerations. Valid planning considerations include, national policy and advice, the environmental, social and economic impacts of a proposal, access to and provision of infrastructure. Financial gain to the Council is not a valid planning consideration and cannot be used to inform local plan proposals. No account has been taken of the Council's financial interest in Chesterford Research Park in proposing this allocation.	
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Uttlesford District Council – Proposed Response

Chapter 5: Employment

Paragraph 5.39

Added text – shown underlined

Deleted text – shown crossed out or struck through

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
5.39	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.	Noted. The college construction due for completion for the start of the 2018 / 2019 Academic year.	Add the following to paragraph 5.39: "Stansted Airport is also

			<p>developing as a centre of Further Education within Uttlesford. A new Further Education College will open on the Airport site in autumn 2018. This college will run courses in aviation and business services, engineering and aircraft maintenance and hospitality, retail and events management. These will offer opportunities for local people to improve their career prospects.”</p>
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Uttlesford District Council – Proposed Response

Chapter 5: Employment

Paragraph 5.40

Added text – shown underlined

Deleted text – shown crossed out or struck through

Ref	Key Issue (from overarching summary)	Council’s Response	Change to the plan
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5.40	<p>Although the Plan refers to the need for broadband to be improved, it is not ambitious enough.</p> <p>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.</p> <p>The target should be at least 100Mb/s with technology that can be upgraded to 1GB/s as needed.</p> <p>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.</p>	<p>Noted. Superfast broadband is in the process of being rolled out through a countywide scheme called "Superfast Essex" this is subject to viability. The overall programme is set to enable 144,000 premises to access superfast broadband speeds of 30Mbps and above by December 2019.</p>	No Change
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Uttlesford District Council – Proposed Response

Chapter 5: Employment

Paragraph 5.45

Added text – shown underlined

Deleted text – shown crossed out or struck through

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
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5.45	<p>The reference to the role that built heritage has to play in the tourism industry, this is welcomed;</p> <p>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?</p>	<p>Noted. Tourism is supported by the strategies set out by policy EMP4, Bullet point 2 that supports rural economies.</p>	No Change
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Uttlesford District Council – Proposed Response

Chapter 5: Employment

Policy EMP1

Added text – shown underlined

Deleted text – shown crossed out or struck through

Ref	Key Issue (from overarching summary)	Council’s Response	Change to the plan
EMP1	<p>Suggestion that larger business sites include space for 'incubator/new businesses'.</p>	<p>Agree, the provision of incubator space and grow-on space within larger business sites, will allow for new businesses to emerge and grow all on the same site.</p>	<p>Change EMP1; Bullet Point 9 to read:</p> <p>“The council will support the provision of small scale office units to accommodate the needs of small sized businesses <u>including ‘incubator’ and ‘grow on space’.</u>”</p>
EMP1	<p>We should be about proactively encouraging employment opportunities in the Garden Communities, not just supporting.</p>	<p>Noted. Appendix 4 (Garden City Principles) indicates that the Garden Communities “must provide a full range of employment opportunities” and the Garden Community Policies require the provision of a range</p>	No Change

		<p>of local employment opportunities.</p> <p>Furthermore, the Council will be developing Economic Strategies for each of the Garden Communities that will help guide the type of employment opportunities in the Garden Communities.</p>	
EMP1	There is no provision for new employment land outside of the Garden Communities and Stansted.	Noted. There is provision for employment land in existing settlements and at Chesterford Research Park. Please refer to section 13 of the Local Plan; Non Residential Allocations.	No Change
EMP1	We should explicitly support the intensification/ expansion of the Principal Employment Areas.	Noted. The policy does support the intensification of the principal employment areas, although not necessarily their expansion. Proposals to expand the principal employment areas will be treated on their merits, it would not be appropriate to support their expansion in all instances.	No Change
EMP1	The wording of EMP1 is excessively restrictive with regard to supporting (non B-class) uses.	Noted. The policy sets out the Council's strategy with regards to employment uses, as defined as B-uses. Policy EMP1 is supportive of employment development in appropriate locations within the district.	Change EMP1 bullet points 1 & 5 to include 'complimentary sui generis uses'

		<p>Bullet points 5 & 7 of EMP 1 may seem in conflict with each other but when viewed in relation to policy EMP2 shows support of “sui generis” uses in existing and proposed employment sites. The allocation of 18ha of the Norther Ancillary Area was part of the withdrawn 2014 local plan this area has been amended as per the recommendation R7 of the 2017 Uttlesford District Council Employment Land Review Update to include the full 43 ha of the site to promote and encourage the efficient use of employment land on the site which has proven surplus to airport requirement since the closure of the northern terminal in 1991.</p>	
EMP1	<p>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.</p>	<p>Noted. Since 1991 (when the north side terminal at Stansted closed) the North Side has proven to be surplus to needs.</p>	<p>No Change.</p>
EMP1	<p>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</p>	<p>Noted. The Council has commissioned a review of the Green Belt in the District. This review did not identify any parcels of land that do not meet the purposes of retaining land in the Green Belt. Therefore the</p>	<p>No Change</p>

		Council has not proposed any changes to the Green Belt boundary in the district.	
EMP1	We should place greater emphasis on supporting high-tech industries.	Agree, amend the policy to place greater emphasis on supporting high-tech industries at Chesterford Research Park.	Amend fourth criterion as follows: “Enable and support the further development of <u>Research and Development space and ancillary office accommodation at Chesterford Research Park</u> as specified in Section 13 (Non Residential Allocations). <u>The development of this site could include a research institute;</u> ”
EMP1	We should support its Chesterford Research Park’s further expansion to assist meeting the overall employment need	Noted. The development of Great Chesterford Research Park is supported by Uttlesford District Council. Please Refer to Chapter 13, Non Residential Allocations.	No Change
EMP1	We should add greater focus and measures to support the construction industry specifically.	Agree. The policy, whilst supportive of skills training in modern industries such as IT. There is an oversight of the skills required for the more traditional industries such as construction and engineering. This will be amended in a new paragraph which builds on 5.39.	Add this new paragraph after para 5.39. In addition to the difficulties identified by the sustainable communities strategy with recruiting people with modern skills such as IT Training. This

		EMP1 bullet point 8 is an overarching policy which encompasses the encouragement of educational and training courses across all industries. The commitment to building skills in the district is evident with the opening of Stansted Airport College which offers qualifications in all aspects of aeronautical industries.	should not detract from measures needed to support traditional industry sectors such as construction and engineering.
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Uttlesford District Council – Proposed Response

Chapter 5: Employment

Paragraph 5.46

Added text – shown underlined

Deleted text – shown crossed out or struck through

Ref	Key Issue (from overarching summary)	Council’s Response	Change to the plan
5.46	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.	As with all draft policies in the plan, Policy EMP2 only applies to developments that require planning permission.	No Change

5.46	Policy, as currently worded would appear to restrict development within existing and proposed employment areas to Class B uses. This paragraph and policy should be revised to acknowledge significant employment generated by appropriate sui-generis and other complimentary uses, e.g. builders merchants and car showrooms.	Noted. Policy EMP2 seeks to protect Class B uses to ensure that a good supply of employment land is retained as this forms a stable foundation for localised economic growth and to ensure there is sufficient land to support the economic strategy set out in the plan. It recognises the important contribution made by other usage classifications. The policy and supporting text does support complimentary sui-generis uses, although this could be worded more clearly.	Amend paragraph 5.46 to read: The policy recognises that there is a significant amount of employment in <u>complimentary sui-generis</u> auxiliary B class uses, e.g. builders merchants which should be protected as part of the overall employment strategy.
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Uttlesford District Council – Proposed Response

Chapter 5: Employment

Policy EMP2

Added text – shown underlined

Deleted text – shown crossed out or struck through

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
EMP2	Concerns around the level of interest for employment land in the district	Noted. This policy seeks to protect employment land from inappropriate changes to alternative uses.	No change

EMP2	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.'	Noted. This policy seeks to protect employment land from inappropriate changes to alternative uses. However, this is a criteria based policy and if the applicant can demonstrate that the criteria are met then the loss can be justified. Requiring all three criteria to be met would potentially lead to the long term protection of employment uses where there is no reasonable prospect of a site being used for that purpose, and amendment is proposed.	Amend the policy such that either the first criterion needs to be met or both of the second criteria.
EMP2	Policy does not acknowledge important role of supporting (non B-class) uses in establishing successful business parks.	Noted. Uttlesford District Council seeks to ensure that a good supply of employment land is maintained as this forms a stable foundation for localised economic growth and to ensure there is sufficient land to support the economic strategy set out in the plan. It recognises the important contribution made by other usage classifications. The policy and supporting text does support complimentary sui-generis uses, although this could be worded more clearly.	Amend policy as follows: Existing and proposed employment areas identified as such on the policies map will be safeguarded for offices, warehouses, industrial and complimentary auxiliary B-class employment supporting 'sui generis' uses.

EMP2	We should clearly support the intensification of Principal Employment Areas.	Noted. This policy restricts the development of uses outside B Use Class or complimentary sui-generis uses, unless certain criteria are met. In doing so, the policy does encourage and supports applications for B Use Class and complimentary sui-generis uses.	No Change
EMP2	Employment sites in the Green Belt should be reviewed so as to allow reasonable expansion of existing employment sites.	Noted. The Council has commissioned a review of the Green Belt in the District. This review did not identify any parcels of land that do not meet the purposes of retaining land in the Green Belt. Therefore the Council has not proposed any changes to the Green Belt boundary in the district.	No Change
EMP2	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.	Noted. These allocations do support non-office related employment at these locations. Chesterford Research Park will be developed for R&D and ancillary office uses, while the Northern Ancillary Area will be developed for business, industry and non-strategic warehousing. Other smaller-scale allocations and existing protected employment sites are able to assist businesses seeking land that is available to meet shorter	No Change

		<p>term needs. In review of the study, it has been demonstrated that the majority of the CPZ is performing well against the purposes defined for it. The CPZ helps to maintain the openness of the countryside and protects its rural character and restrict the spread of development from the airport. For some parcels, particularly to the south of the airport, the CPZ plays an essential role in protecting the separate identity of individual settlements. Further sites have been identified that sit outside of greenbelt and CPZ restrictions and will be able to contribute to meeting the short term employment land needs for the district.</p>	
EMP2	<p>We should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing.</p>	<p>Noted. When a planning application is submitted other policies in the plan require infrastructure, services and environmental considerations to be taken into account. The plan seeks to meet its objectively assessed need for housing.</p>	<p>No change</p>
EMP2	<p>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.</p>	<p>Noted. The criteria based approach set out in the policy allows for a flexible approach to be taken to planning</p>	<p>No Change.</p>

		applications on employment areas. If circumstances change, this policy allows those changed circumstances to be taken into account.	
EMP2	Concerns over the marketing period suggested in the policy, either being too long or too short.	Noted. The marketing period, set out in Appendix 5, is for 12 months. The Council considers that this is an appropriate length of time to allow for the market to be tested ensuring that any potential occupiers have a chance to make their interests known. Any shorter period would not allow the market to be properly tested. A longer marketing period would impose excessive costs on the business exiting the site and / or the site operators, which if the market does not want to occupy that site, would be unreasonable.	No Change
EMP2	Conversion to residential should not be encouraged.	Noted. The purpose of this policy is to keep employment areas in employment use.	No Change

Uttlesford District Council – Proposed Response

Chapter 5: Employment

Policy EMP3

Added text – shown underlined

Deleted text – shown crossed out or struck through

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
EMP3	EMP3: As before with improved enforcement criteria for evidence base Appendix 5; Again, why invite change of use?	<p>Noted. This policy is in place uses beyond employment use can be found for sites where employment use is no longer a viable option. Retaining buildings in an empty state, without any hope of getting an occupier will result in buildings becoming derelict and is not a good use of land.</p> <p>Sites outside identified employment areas wishing to change use will need to demonstrate that employment use is no longer viable as Uttlesford District Council does not wish to lose valuable employment land.</p>	No Change.
EMP3	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	Noted. The inset map will be duly amended to show Saffron Walden Business Centre.	Amend Map 18 to show Saffron Walden Business Centre.

Uttlesford District Council – Proposed Response

Chapter 5: Employment

Paragraph 5.48

Added text – shown underlined

Deleted text – shown crossed out or struck through

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
5.48	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.	Noted. The council is committed to providing 40% affordable housing on sites of 11 dwellings or more during the 2011-2033 plan period.	No Change.

Uttlesford District Council – Proposed Response

Chapter 5: Employment

Policy EMP4

Added text – shown underlined

Deleted text – shown crossed out or struck through

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
EMP4	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.	Noted. Support welcomed.	No Change
EMP4	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.	Noted. Support welcomed.	No Change
EMP4	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.	Noted. Saffron Walden currently has 38 rooms spread between 2 three star hotels. The Essex Corporate Hotel and Conferencing Facilities Study indicates that there is no evidence for the need of further 3 Star hotels in Saffron Walden, although there is evidence that budget hotel could be supported in the town.	No Change

EMP4	Schemes should be encouraged to generate their own energy and to minimise use of the car.	Noted. The plan should be read as a whole, polices on transport and sustainable design and construction are contained in chapters 7 and 9.	No Change
EMP4	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.	Noted. Support Welcomed. Criterion c of the policy references the historic environment.	No Change
EMP4	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.	Noted. Criterion c of the policy references enhancing the historic environment.	No Change.

Add this new paragraph after para 5.39.

Notwithstanding the difficulties identified by the sustainable communities strategy with recruiting people with modern skills such as IT Training, this should not detract from measures needed to support traditional industry sectors such as construction and engineering.

Uttlesford District Council – Proposed Response

Chapter 6 Retail

Added text – shown underlined

Deleted text – shown crossed out or struck through

Retail paragraphs 6.1 – 6.9

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
	<ul style="list-style-type: none"> – Retail in smaller towns should be supported where retail is being lost to accommodation – Support should be given for retail in smaller towns where retail is being lost to accommodation. 	Policy RET4 addresses the issue of Loss of Shops and Other Facilities.	No change
	Food superstores do not capture nearly all the main food-shopping spend in the district.	Noted. Saffron Walden and Great Dunmow food superstores do capture nearly all the main food-shopping spend in the District (N.B. spend outside the district, e.g. at Bishops Stortford, is by definition not counted as part of the main food shopping spend in the district). The text recognises that Stansted Mountfitchet is the third largest retail centre, and that residents shop in Bishops Stortford.	No Change

Town and Local Centre Strategy Policy RET1 and associated paragraphs 6.10 – 6.17

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
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Para 6.10	Out of centre retail not to be encouraged at the North Uttlesford Garden Community at the detriment of Saffron Walden	Policy RET1-Town and Local Centres Strategy aims to ensure the vitality and viability of existing town and local centres by requiring larger scale development to be focussed on the town centres with Saffron Walden being the first centres to be considered.	No Change
	Appropriateness of restricting of retail provision in proposed Garden Community neighbourhood Centres to a supermarket and small convenience shops to avoid adversely impacting on established centres.	The retail offer in the Garden Communities will be dependent on the resident population and is envisaged over time the retail provision would be proportionate to each Local Centre.	No Change
Para 6.12 – 6.13	No mention of increasing Saffron Walden town centre retail area. Growth of on-line shopping and impact not addressed.	Policy RET1 ensures that larger scale development will be focussed on town centres based on the given hierarchy with Saffron Walden at the top thus ensuring an increased retail offer over the plan period. The Retail Study Update 2018 shows the demand for retail floor space in Saffron Walden. Growth and impact of on-line shopping, though not mentioned is taken into account in the Retail Studies Update 2018 and is factored in when determining demand of future retail floor space.	No change No Change
	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.	Agreed, the Garden Community policies require new Local Centres that will contribute to meeting the day-to-day need of the communities.	No change
	Important that daily retail needs are met at the outset to minimise traffic movements and develop the community.	The Retail Study 2018 identifies the capacity for additional convenience floorspace in Saffron Walden and Great Dunmow by 2033. This will	No change

		provide the opportunity for people to shop locally and minimise travel.	
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The Location and Impact of New Retail Development – Policy RET2 and associated paragraph 6.18

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
Para 6.18	Proposal to add “out of town retail only if no town centre site/convenience stores are needed on developments more than 500m from retail centres.”	Flexibility is required and the stipulation that edge of centre sites should be accessible and well connected to the town centre negates stipulation of a specified 500m distance.	No change
Policy RET2	<p>Harlow Council welcomes recognition of retail hierarchy/future retail floor space for each garden community could be linked to the Retail Impact Assessment threshold in Policy RET2 (1,000m²)</p> <p>Policy RET2 retail threshold not based on any empirical evidence/should be 750sq. m.</p>	<p>Noted. It is not appropriate to manage new retail development in the Garden Communities through policy RET2, which deals with retail development outside town and local centres. Policy RET1 proposes that the new Garden Communities are designated as Local Centres.</p> <p>NPPF provides latitude for a locally set floor space threshold and in the absence of a local threshold NPPF provides a default threshold of 2,500sq m. The Council considers that due to the relatively small-scale nature of retail provision across the district, a threshold for the impact assessment of lower than the figure set out in the NPPF is appropriate.</p>	<p>No change</p> <p>No change</p>

Town and Local Centres and Shopping Frontages – Policy RET3 and associated paragraph 6.19 – 6.21

Ref	Key Issue (from overarching summary)	Council’s Response	Change to the plan
Policy RET3	Policy seen as reducing protection of Primary Frontages by allowing change of use from A1 of ground floor to non-A1 uses after demonstrating non-viability through a marketing or an independent assessment.	<p>This policy seeks to protect retail uses along the primary and secondary shopping frontages in the town and local centres. The policy requires any development that seeks to change use away from retail and town centre uses to meet the criteria set out in the policy.</p> <p>Some changes to the policy to protect main town centre .uses are proposed.</p>	<p>Amend the policy to read:</p> <p>Shop frontages form an intrinsic component to the character of urban streetscapes;</p> <p>“Along Primary Shopping Frontages as identified on the Policies Map, change of use (that require planning permission) of the ground floor from A1 uses to non-A1 uses will only be permitted if the applicant is able to demonstrate that the unit is not viable as an A1 shop use. <u>The change of ground floor uses from main town centre uses (see the definition in the NPPF) to uses falling outside that definition will only be permitted if the applicant is able to demonstrate that the unit is not viable as a main town centre use.</u> The non-viability of the unit would need to be proven either by marketing or an independent assessment in accordance with the requirements set out in Appendix 5.</p> <p>Along Secondary Shopping Frontages as identified on the Policies Map change of use of A1 shop units to town centre</p>

			<p>uses of retail, leisure, office and other main town centre uses will be permitted. <u>The change of ground floor uses from main town centre uses (see the definition in the NPPF) to uses falling outside that definition will only be permitted if the applicant is able to demonstrate that the unit is not viable as a main town centre use. The non-viability of the unit would need to be proven either by marketing or an independent assessment in accordance with the requirements set out in Appendix 5.</u></p> <p>Along both Primary and Secondary Shopping Frontages change of use to residential will be allowed on upper floors. Mixed use schemes with a residential element will be appropriate within the town and local centres.</p> <p>Development that would contribute to the tourism function within these centres will be supported where it conserves or enhances the character of the townscape.”</p>
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Loss of Shops and Other Facilities Policy RET4 and Paragraphs 6.22-6.23

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
Policy RET4	Criteria for viability in Appendix 5 need to be strengthened and then enforced.	<p>Policy RET4 criteria is robust and protects loss of shops and other facilities by requiring applicant to demonstrate that there is no significant demand for the shop/facility. The Marketing Assessment provides another level of protection from loss of shops/facilities.</p> <p>The planning application process will ensure that the criteria are adhered to in the course of decision making.</p>	No change proposed
Policy RET4	Clarify if Policy RET4 prevents pubs from becoming Express stores under permitted development rights.	Express shops would require permission and planning permission would be considered on the merits of each case.	No change

New Shops in Rural Areas RET5 and paragraphs 6.24

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
Policy RET5	Policy RET5 New shops in rural areas is supported but there should be of provision of foot /cycle paths	Noted. Policy RET-5 also stipulates that the site should be well related to the village have the potential to reduce the need to travel by car.	No change
Policy RET5	Policy should be extended to include all community facilities e.g. churches, pubs, schools, halls, museums etc.	<p>Policy C4 –New Community Facilities within the Countryside addresses this request.</p> <p>Including community facilities in Policy RET-5 would be an unnecessary duplication.</p>	No change

Uttlesford District Council – Proposed Response

Chapter 7: Transport

Added text – shown underlined>

Deleted text – shown crossed out or struck through

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
Para 7.1	Repetition causing confusion should be addressed for clarity.	Noted. Examples give context but last 2 sentences repeated in error.	Delete last 2 sentences
7.2	<p>Insufficient detail on transport impacts/mitigation</p> <p>lack of public transport, ineffective IDP</p> <p>limited transport assessments</p> <p>Rat running via Stebbing, Felsted, and Dunmow</p>	<p>Noted. Paragraph 7.2 simply describes overall approach with mitigation set out in Policy TA5.</p> <p>The strategy of 3 GCs will improve public transport</p> <p>Considerable transport work across district including 2016 UDC Transport Study and 2017 Updates. Detailed transport assessments will be submitted with the planning applications for development.</p> <p>More detail on transport and mitigation will be undertaken for IDP, DPD for West of Braintree GC and in master planning work.</p>	<p>No change required although further evidence will be produced on A505 and A120 corridors.</p>
7.3	<p>Bridleway network is fragmented, inadequate and requires improvement</p> <p>Non-motorised multi user paths instead of shared pedestrian/cycling paths that damage bridleway network</p>	<p>This paragraph describes account taken of other plans. The issues on bridleways raised however have implications for other paragraphs – 7.5 below</p> <p>Uttlesford is a rural district that with a significant although often fragmented network of footpaths and bridleways with demands from different users.</p>	<p>No change. However it is acknowledged the bridleway network is fragmented with opportunities for improvement including where appropriate non-motorised multi user</p>

	<p>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</p> <p>The A120 is already saturated several times a day</p>	<p>Paths available to wide group of users in ongoing North Uttlesford Garden Community Transport work that will develop Multi-Modal work developed with ECC. More detailed work will be undertaken for the DPD for North Uttlesford GC and in master planning work.</p> <p>The 2016 Transport Study assessment of A120 shows acceptable impacts in terms of traffic flows. A sensitivity test in the Transport Study 2018 Update further confirms this. The spatial strategy of a Garden Community in the north of the district spreads the load with greater impacts resulting from focusing 3 GCs on the A120. Programmed improvements to J8 will help reduce congestion.</p>	<p>paths in 7.5 below.</p>
7.4	<p>Often no reliable alternatives to car travel/lack of a good public transport network. What is planned?</p>	<p>Noted. Paragraph 7.4 shows that even without growth, congestion increases. Planned transport measures are in Policy TA5. The strategy of 3 GCs will improve the public transport network.</p>	<p>No change</p>
7.5	<p>Additional policies needed to improve public transport</p> <p>Acknowledge role Bishop's Stortford plays in delivering services and transport to UDC</p>	<p>Paragraph sets out the current situation for sustainable transport modes. The policies and context for public transport are in Policy TA1 - 2 and TA5. Supporting context to be enhanced.</p> <p>The Garden Communities will look at access to the rail network, as appropriate, through the DPD and master planning work. However, appropriate to add reference to the transport study.</p>	<p>New sentence "However it is acknowledged the bridleway network is fragmented with opportunities for improvement including non-motorised multi user paths"</p> <p>New paragraph on rail "The UDC transport study"</p>

	<p>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</p> <p>The walking network in Saffron Walden is not "well connected"/one pedestrian crossing</p>	<p>Saffron Walden has extensive walking network and as the largest settlement in the district has above average levels of walking</p>	<p>notes the opportunities for more rail use including access to rail in the Garden Community accessibility criteria”</p>
7.6	<p>Consider electric bikes</p> <p>Implement existing cycling strategy</p> <p>Lack of public transport network</p> <p>Include equestrians on cycle routes</p> <p>Lack of detailed transport assessment</p> <p>Complete the Flitch Way Bridle path from Takeley to Dunmow South roundabout</p> <p>All new developments should be made to include safe cycle routes to the nearest transport hub.</p>	<p>Para notes ECC cycle strategy with cycling measures set out in that strategy. ECC have recently updated its cycle strategy. The delivery of development in areas close to measures proposed in the cycling strategy will assist with the implementation of the strategy.</p> <p>The limitations of the public transport (and cycling network) network are acknowledged in Paragraph 7.5</p> <p>The Uttlesford Cycling Strategy 2014 (prepared by ECC) considers where cycleways appropriate for horse riders/is being updated.</p> <p>Detailed transport assessments will be submitted with the planning applications for development.</p> <p>Additions to Flitch Way Bridle path considered in para 7.14 and policy TA5, which references “Flitch Way Improvements – New walking and cycling connections planned south of Great Dunmow.”</p> <p>Not proportionate for all developments to provide safe cycle routes to the nearest transport hub. Policies TA1, TA2 &TA5 and the Uttlesford Cycling</p>	<p>Refer to updated ECC cycle strategy when published.</p> <p>Add reference to the Uttlesford Cycling Strategy 2014 guiding development and infrastructure provision in the plan.</p>

		Strategy set out the policy framework for the provision of cycle routes. Policy TA2 includes reference to 'safe design' of routes.	
7.7	<p>No modelling has been carried out to consider the impact of NUGC on Saffron Walden</p> <p>The proposed alternative route to avoid the SW town centre still passes through the AQMA</p> <p>What will happen if the Peasland Road TRO is not implemented</p> <p>Saffron Walden traffic solutions must not encourage more heavy traffic through Thaxted</p>	<p>The impacts on Saffron Walden have been tested in the WYG Transport study 2016 and 2017 ECC assessment and found to be at acceptable levels. This modelling covers the whole district (and beyond in places), and looks at the cumulative impact of development on the whole network.</p> <p>Saffron Walden AQMA stays within acceptable limits. The Uttlesford Local Plan Transport Study Addendum looking at Saffron Walden states "Deliverable improvements to the Peaslands Road corridor have been identified that will help to provide increased opportunities for traffic to avoid the centre. With these in place a development of circa 150 dwellings can be accommodated (on the Kier site) with acceptable impacts. Subject to an appropriate transport assessment /air quality assessment as part of the normal planning application process."</p> <p>Peasland Road TRO scheme is implemented - yellow lines on route</p> <p>There are no large developments proposed in Saffron Walden, and consequently large increases in traffic through Thaxted are not anticipated as a result of development in Saffron Walden. Transport work shows acceptable impacts in Thaxted</p>	No change

7.8	<p>No solution has been found to address unacceptable traffic impacts in Saffron Walden</p> <p>Need southern ring road for Saffron Walden</p>	<p>The measures proposed are those of the transport authority with traffic impacts levels shown to be acceptable.</p> <p>The need for a southern ring road is matter for plan review. Such a scheme is likely to require substantial development in the area to assist with funding for the scheme.</p>	No change
7.9	<p>Add future and existing Section 106</p> <p>Points to NUGC being car-reliant</p> <p>Needs a reference to Air Quality</p> <p>Query plans for the Kier site/150 homes</p>	<p>Agree, there is potential for future s106s to contribute to this scheme. Add “and relevant future S106s”</p> <p>NUGC will not be car reliant, policy SP7 requires the development to “Provide transport choice, including high quality, frequent and fast public transport services to Saffron Walden, Cambridge, Great Chesterford Rail Station and nearby employment parks (including the Wellcome Genome Campus and Chesterford Research Park). A network of safe walking and cycling routes will also be provided, including cycle routes connecting with the employment parks.” Master planning work, to be adopted as a Development Plan Document, will follow up this requirement with further detail.</p> <p>Cross-reference to air quality already mentioned Sustainable transport measures are proposed for NUGC</p> <p>ECC have assessed the impacts of the Kier proposal</p>	<p>Add to paragraph 7.9 end of 2nd sentence “This location complements the specific measures that will be delivered from existing Section 106 contributions <u>and relevant future Section 106s contributions.</u>”</p>

	<p>The proposal for full transport and air pollution studies of Saffron Walden is sound</p>	<p>and found impacts to be acceptable</p> <p>Noted</p>	
7.10	<p>Easton Park GC can only make traffic congestion considerably worse in Great Dunmow</p> <p>Travelling from NUGC to Audley End for London trains</p> <p>What public transport, how will it be paid for and who will have control?, very substantial trip movements, mostly by car</p> <p>Most sustainable transport impact small-scale, incremental development, following historic and natural growth of rural towns and villages</p>	<p>Para 7.10 notes that 3 GCs were found preferable in transport terms and the transport study shows acceptable impacts on the highway network.</p> <p>The plan puts in place a policy framework requiring a modal shift, particularly in the Garden Communities, from the private motor car to other means of transport. The master planning work, that will follow and be adopted as a Development Plan Document, will examine in further detail these measures.</p> <p>The villages have the least sustainable transport with growth in these locations unlikely to improve services</p>	No Change
7.11	<p>Allocate Beldham's Lane for housing on fringe of Bishops Stortford given services/recognise importance of Bishop's Stortford in providing UDC services</p> <p>Reflect high car ownership in parking provision for new developments</p>	<p>Para 7.11 gives context on transport in the district including modal splits for types of settlement. Site in green belt/no further supporting information on transport impacts</p> <p>Policy TA4 ensures that adequate parking provision made for new developments</p>	No Change

	Seems realistic/cycling as a leisure activity also attracts tourism, if investment in good cycle paths	Noted	
7.12	<p>Welcomed but failure to recognise importance of Bishop's Stortford</p> <p>Not only improve existing services but add to the provisions where possible to encourage use of public transport.</p> <p>More on expectations for passenger transport for Garden Communities</p> <p>The local press has recently reported that bus services are to be or have been reduced.</p>	<p>Bishop's Stortford's role recognised in spatial strategy</p> <p>Noted, new developments will have to demonstrate appropriate measures that will improve and support public transport and provide new public transport routes, in line with policy TA2. This could include adding services.</p> <p>Add reference to passenger transport for Garden Communities below 7.19 "that are outlined at a high level in the transport evidence done in conjunction with ECC and will be pursued further in more detailed Transport Assessments accompanying the planning application for the Garden Communities."</p> <p>Noted, new developments will have to demonstrate appropriate measures that will improve and support public transport and provide new public transport routes, in line with policy TA2.</p>	No Change/Add to Paragraph 7.19 as below

7.13	<p>Equestrians should be included on all Multi User paths unless it is not possible to do so, following consultation with British Horse Society. 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 e.g. cycle paths generating electricity</p> <p>Existing facilities mentioned are insufficient for existing use - so growth equals over demand/there needs to be effective planning of new facilities.</p>	<p>Stipulations on growth must be reasonable and proportionate. Separating cycle routes requires funding/extra land that may not be available. Add “in consultation with the British Horse Society. Nevertheless, multi-user paths are not the default position of Uttlesford District Council and the paragraph should be amended to reflect this.</p> <p>New transport infrastructure is addressed in Policy TA5</p>	<p>Amend the text as follows:</p> <p><u>“Where segregated paths cannot be delivered due to, for example funding or land availability</u> M<u>multi user paths will be encouraged for pedestrians, cyclists, and where appropriate horse riders in consultation with the British Horse Society.”</u></p>
7.14	<p>Omits that Flitch Way is mostly a definitive Bridleway, not a cycleway/mention of equestrian users</p> <p>Flitch Way is a country park is for leisure activity not be viewed as an alternative Cycle highway</p>	<p>Already notes that Flitch Way is a country park. Add that Flitch Way is mostly a Bridleway where walking, cycling and horse riding is allowed.</p> <p>All proposed developments should use existing links (access points) onto the Flitch Way. This is not to say that new networks of footpaths and bridleways should not be created around the Flitch Way spine but that no further direct access nodes should be created on to this recreational spine.</p>	<p>Add a new second sentence to 7.14:</p> <p><u>“The Flitch Way is, for the majority of its length, a Bridleway where walking, cycling and horse riding is allowed.”</u></p>
7.15	<p>Need more ambitious modal shift for garden communities/step change</p> <p>Travel plans must be supported by a robust series of measures, infrastructure and incentives/penalties</p>	<p>Agree to more ambitious modal share for garden communities/recognise step change subject to limits of making provision in a rural area.</p> <p>Agree, for Travel Plans to be robust there must be incentives and penalties regarding their implementation.</p>	<p>Adopt ECCs modal share ambitions. Add new sentence to the end of paragraph 7.15 “<u>That for Garden Communities a more ambitious shift away from single occupancy vehicle</u>”</p>

	<p>Locate growth in areas where need to travel minimised/ maximise use of sustainable transport modes</p> <p>NUGC selection is incompatible with creating a self-contained garden village/serving life sciences defeated by topography and location 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</p>	<p>Accessibility scoring for the Garden Community provides best locations for minimising need to travel/maximising sustainable modes</p> <p>NUGC subject to same sustainable policies as other garden communities and scores best of all on accessibility scoring. NUGC is located within 15-30 minute cycle ride of multiple employment locations. Furthermore, employment, community and social facilities will be provided for within NUGC. Further work on movement within and external to NUGC will be undertaken through the masterplan work.</p>	<p>trips is required to reduce the impact on the highway network. Travel plans must be supported by a robust series of measures, infrastructure, incentives and penalties to ensure delivery”</p>
7.16	<p>NUGC selection is incompatible with this/principles of creating a self-contained garden village that serves life sciences outside of its boundary contradictory/defeated by topography and location Destinations for employment, provisions, education and social centre should be walkable or within 5 to 15 minutes easy cycling distance. Valleys are long/thin, separated by sharp steep slopes/those at the extreme have a more distance to travel to amenities Movement within NUGV not supportable/large numbers of residents will travel long distances by road for employment Address Garden Communities separately on sustainability -i.e. step change in non-car use</p>	<p>Para 7.16 makes requirement for travel plans NUGC selection addressed in para 7.10 NUGC subject to same sustainable policies as other garden communities and scores best of all on accessibility scoring. NUGC is located within 15-30 minute cycle ride of multiple employment locations. Furthermore, employment, community and social facilities will be provided for within NUGC. Further work on movement within and external to NUGC will be undertaken through the masterplan work.</p>	<p>Amend the text as follows:</p> <p>“Applications for major new development sites will be required to submit clear proposals in a travel plan for reducing travel to work by car <u>for Garden Communities such plans should address step change in non-car use including the masterplan process.</u>”</p>
7.17	<p>Take account of on-demand services/car sharing/spaces for community vehicles/provide travel plan co-ordinator</p>	<p>Para sets context for travel plan. Mention community vehicles in 7.18</p>	<p>Amend the text as follows:</p> <p>“As part of the travel planning process developers will be</p>

			required to <u>provide</u> nominate a Travel Plan Coordinator and”
7.18	<p>Saffron Walden is choked with traffic already/need bypass to reduce traffic in the town</p> <p>Need more than culture change/Improve access to rail</p> <p>Need plan for electric car infrastructure</p> <p>No safe walking/cycle routes to key facilities or school</p> <p>Innovation needed- community run services/ speed up local journeys or journeys to railway hubs.</p>	<p>Paragraph 7.9 addresses bypass potential for Saffron Walden by referencing the plan review</p> <p>Policies TA1, TA2 &TA5 set out the policy requirements regarding access to sustainable travel modes and new infrastructure and measures.</p> <p>Policy TA3 sets out the policy for the provision of electric charging points for vehicles.</p> <p>Policy TA2 sets out the policy framework for delivering safe cycling and walking routes</p> <p>Para sets out details required. Mention community vehicles re; above.</p>	<p>To paragraph 7.18 third bullet add; “... and maximising the proportion of trips made by public transport <u>and community vehicles, by car share, on foot and by cycle.”</u>”</p>
7.19	<p>Henham 7/7a bus service is running at a loss but is essential</p> <p>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</p> <p>Add references to relevant Essex County Council documents to ensure measures designed and implemented to a high standard.</p>	<p>Noted</p> <p>3 Garden Communities will assist in the provision of bus services. Policy SP6 requires the investigation of a direct, high quality, frequent and fast direct public transport route to Stansted Airport and Great Dunmow.</p> <p>Add references to Essex CC documents</p>	<p>To Paragraph 7.19 Add sentence; “Applications should comply with the current Essex County Council Highways Development Policies and Essex Parking Standards Design and Good Practice. <u>Applications also need to take account of; Essex Design Guide</u>”</p>

			<p><u>Developer Guide to Infrastructure contributions</u> <u>Public Rights of Way Guide</u> <u>Bus strategy documents</u></p> <p>Add reference to passenger transport for Garden Communities below 7.19 “that are outlined at a high level in the transport evidence done in conjunction with ECC and will be pursued further in more detailed Transport Assessments accompanying the planning application for the Garden Communities.”</p>
Policy TA 1	<p>Getting to work relies on car, lower use of cars not possible in isolated villages.</p> <p>Key public transport role of Stansted though it has limitations.</p>	<p>Policies TA1, TA2 &TA5 set out the policy requirements regarding access to sustainable travel modes and new infrastructure and measures. The plan puts in place a policy framework requiring a modal shift, particularly in the Garden Communities, from the private motor car to other means of transport. The master planning work, that will follow and be adopted as a Development Plan Document, will examine in further detail these measures. More Detailed accessibility criteria used for Garden Communities to capture such issues</p>	<p>Delete second criterion and replace with “Development will be managed so that it <u>maintain or</u> improves road safety and takes account of the needs of all users, including mobility impaired users;.</p> <p>Delete bullet 5 and</p>

	<p>Encourage buses to call at GCs and employment sites - Genome/Stansted.</p> <p>Improve cycle and footpaths to existing and new sites></p> <p>Wider political pressure needed to draw in resources.</p> <p>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</p> <p>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</p>	<p>Stansted’s role as a service centre for buses is recognised in paragraph 7.5.</p> <p>Note buses/cycling/walking to key transport sites. Policy sets out requirements for accessible development including those used in Garden Community Accessibility Criteria. Master planning work, to be adopted as a Development Plan Document, will follow up this requirement with further detail.</p> <p>Policy TA2 requires cycling routes and facilities to be taken into account.</p> <p>Uttlesford will leverage all available resources to deliver sustainable development in the district.</p> <p>NUGC will plan for rail/bus/cycling/walking links to employment. The detailed work for this will be undertaken through the master planning work that will be adopted as a DPD.</p> <p>The 3 new Garden Communities will assist in the provision of bus services. Easton Park has 2nd highest accessibility score of those GCs assessed. Policies TA1, TA2 &TA5 set out the policy requirements regarding access to sustainable travel modes and new infrastructure and measures. The plan puts in place a policy framework requiring a modal shift, particularly in the Garden Communities, from the private motor</p>	<p>replace with the below two bullets:</p> <p><u>“A Transport Assessment will be required on all developments creating significant impact on the highway to assess the impact and potential mitigation required”.</u></p> <p><u>“Travel Plans will be required for major development proposals to ensure a reduction in single occupancy car travel will be achieved through a series of measures and incentives/penalties and targets, on larger developments a travel plan co-ordinator will be required”.</u></p> <p>New 4th bullet “Development should be located where it can provide safe, direct walking and cycling routes between new developments and schools / other community</p>
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	<p>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, does not meet aims of the policy with no access plans/reliance on B184/Saffron Walden, A505 already at capacity</p> <p>New growth should be linked to existing facilities by cycle paths/footpaths/roads dangerous/reduce pollution/needed prior to commencement</p> <p>Note Travel Plans and Transport Assessments/Statements are very different</p>	<p>car to other means of transport. The masterplanning work, that will follow and be adopted as a Development Plan Document, will examine in further detail these measures. Appropriate infrastructure and mitigation measures will be put in place to mitigate the impacts of the development.</p> <p>Accessibility scoring used for Garden Community locations with NUGC having the highest score of all assessed. Transport Study shows impacts acceptable impacts on Saffron Walden. Further assessment work done on A505 corridor that shows most of impacts from development outside the district. Policies TA1, TA2 &TA5 set out the policy requirements regarding access to sustainable travel modes and new infrastructure and measures. The plan puts in place a policy framework requiring a modal shift, particularly in the Garden Communities, from the private motor car to other means of transport. The masterplanning work, that will follow and be adopted as a Development Plan Document, will examine in further detail these measures. Appropriate infrastructure and mitigation measures will be put in place to mitigate the impacts of the development.</p> <p>Taken into account in paragraph 7.12 and policies TA1 and TA2.</p> <p>Noted, amend reference to Travel Plans and</p>	<p>infrastructure, together with appropriate design for these new facilities that encourages and delivers sustainable travel”</p> <p>Amend the final bullet of TA1 as follows: “Appropriate and safe networks, <u>as defined by the Essex Local Transport Plan</u>, will be provided to allow for increasingly independent travel by vulnerable road users to allow such individuals to provide for their own travel needs.”</p>
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	<p>Want all opportunities taken to enhance the off road network so accessible to all users including equestrians</p> <p>Supports policy that reduces car use. However public transport in Uttlesford is limited and providing links to a limited network is challenging. Uttlesford should lobby government for sustainable transport</p> <p>Support policy but need definition of appropriate and safe network</p> <p>Want towns and garden villages linked with cycle paths with opportunity for NPs to go into more detail</p> <p>Concerned too aspirational, too car reliant, no account of reality</p>	<p>Transport Assessments in Policy TA1 to ensure the differences in requirements is clear.</p> <p>Taken into account in paragraph 7.13 and TA2.</p> <p>The district is rural in nature with relatively limited bus services in many parts. However, the focus of development in the new plan is in three new Garden Communities. This concentration of development will mean that infrastructure, including public transport infrastructure is a viable and deliverable form of transport to support this development.</p> <p>Essex County Council, as the Highways Authority, sets standards for an appropriate and safe network. This can be found in the Essex Local Transport Plan 2011. Nevertheless, this could be made clearer in the policy text</p> <p>The Garden Communities will include a network of new cycle paths that link to nearby employment and other destinations. The detail of this work will be included in the master planning work, to be adopted by the Council as a Development Plan Document.</p> <p>Transport Study assess current and future situation. Nevertheless, it is right for development at the Garden Communities to be aspirational, but realistic, about many things, including sustainable modes of transport.</p> <p>Car park improvements at rail stations will be</p>	
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	<p>Need to expand existing car parking facilities around railway stations e.g. Stansted Mountfitchet, Elsenham, Chesterford</p> <p>Requested more comprehensive study for NUGC/A505 at capacity/two GC option better impact</p> <p>Lack of rail link/frequent bus service</p> <p>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</p> <p>Car sharing sensible as an option but cannot legislate to force people down this path</p>	<p>considered in conjunction with network rail as appropriate</p> <p>The Council has undertaken work on the impacts of NUGC on the A505. This study identifies that the impact of NUGC on this road is limited when compared to the wider impacts of growth, particularly in Cambridgeshire. It also looks at the feasibility of an upgrade to this road between Royston and the A11, and identifies a number of feasible options. The Cambridgeshire and Peterborough Combined Authority has also identified funding and is seeking to commission a feasibility study looking at the A505. Paragraph 3.61 of the plan identifies that the proposed highway improvements are capable of accommodating 3,300 new homes at this location with no worse impact on the junctions on the A505.</p> <p>Noted. The plans for the Garden Communities will include bus links to nearby destinations.</p> <p>Noted. It is right for development at the Garden Communities to be aspirational, but realistic, about many things, including sustainable modes of transport. The proposed mitigation will support the development.</p> <p>People cannot be forced to car share. Car sharing is acknowledged in paragraph 7.18, this identifies Travel Plans as a way of maximising the proportion</p>	
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	<p>Travel Plans for major developments should be defined/exempting specialised housing for older people as a low traffic generator</p> <p>Support Council ambition to reduce need to travel by car/increase the use of public transport/ should be located in locations which are sustainable</p>	<p>of trips by public transport, car share and by foot and cycle. It does not suggest this is done by force. Typically this is done by providing alternatives and allowing individuals to make their own choice.</p> <p>Specialised housing would be considered on its merits.</p> <p>Noted</p>	
Policy TA2	<p>Acknowledge ageing population/rural isolation recognise essential bus services, community travel, Dart scheme wanting encouragement of buses to call at employment sites</p> <p>Support plan policies aimed at reducing need to travel by private car, such as improved walking, cycling public transport infrastructure, and broadband</p> <p>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</p> <p>NUGC assisting in minimising car journeys by providing housing for knowledge economy</p> <p>Supports increasing rail patronage/measures subject to business case</p>	<p>Community travel is acknowledged in policy TA2.</p> <p>Support noted. Garden Communities ensure degree of self-containment. Accessibility criteria is based on proximity to sustainable travel/facilities</p> <p>Noted. UDC and ECC have submitted bid for A120 public transport study. While the government chose not to fund this, the Councils are committed to looking at radical improvements to public transport infrastructure and will consider other options for funding this study.</p> <p>Noted, plans for NUGC include public transport and walking and cycling links to the nearby employment sites.</p> <p>Support noted. Accessibility criteria includes</p>	<p>Amend bullet point 1 of the policy by replacing reference to “multi-user” with “appropriate”,</p>

<p>Supports policy that reduces car use/journeys/public transport limited and providing links to a limited network is challenging /lobby government for sustainable transport/rail is most sustainable form of transport</p> <p>Easton Park would be relatively isolated and motor transport will be the only realistic mode for residents</p> <p>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</p> <p>Welcome mention of equestrian access but want proactive approach to enhancement of network from new growth</p> <p>Welcomes improving sustainable transportation connectivity between Braintree Stansted and Bishop Stortford/amend bullet point 1 reference to multi-users/not all routes can accommodate multi users</p> <p>Supports this policy/seek definition of appropriate/safe network request Rights of Way, cycling, pedestrian Towns and garden villages</p>	<p>proximity to rail services and public transport/ Proposed rail improvements listed in the transport study. The district is rural in nature with relatively limited bus services in many parts. However, the focus of development in the new plan is in three new Garden Communities. This concentration of development will mean that infrastructure, including public transport infrastructure is a viable and deliverable form of transport to support this development.</p> <p>Accessibility Assessment scores Easton Park 2nd of assessed Garden Community options. The scale of Easton Park and the planned mix of uses, means that the day-to-day needs of residents will be capable of being met within the new community.</p> <p>NUGC proposes sustainable transport routes to the Wellcome Institute and other key locations.</p> <p>Noted. The masterplanning work for the Garden Communities, to be adopted as DPDs, will look at appropriate improvements to the nearby bridleway network.</p> <p>Noted, agree change to multi-user routes. Multi-user paths are not the default position of Uttlesford District Council and a change is proposed to paragraph 7.13 to reflect this.</p> <p>Essex County Council, as the Highways Authority,</p>	
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	<p>should be linked with cycle paths/Opportunity for NP to go into more detail</p> <p>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</p> <p>Need critical mass of people on bikes/supporting infrastructure/cycle and pedestrian-only routes from settlements to places of work/essential services. Cycle/pedestrian routes meander not sustainable unless to wider network, Cycling got to be easy, appealing and safe</p> <p>Investment in the existing public transport across region/detailed plan for links for the proposed developments</p>	<p>sets standards for an appropriate and safe network. This can be found in the Essex Local Transport Plan 2011. A change is recommended to TA1.</p> <p>Agree, policies SP6, SP7, SP8 and TA2 require safe walking and cycling routes to be provided connecting to local facilities.</p> <p>Agree, a critical mass of cyclists brings about many benefits. Getting a critical mass of cyclists requires the provision of high-quality, safe cycling infrastructure that goes directly to popular destinations that inexperienced cyclists would be happy to use.</p> <p>Noted. Policy TA2 requires developers to provide appropriate public transport improvements. This can include existing services and new services.</p>	
<p>Para 7.20-7.22</p>	<p>Need policy on Electric Charging provision that is not in new development</p> <p>Government anticipates all new vehicles must be hybrid or electric by 2040</p> <p>Suggestion of 20% not 2% for flatted development</p>	<p>Noted but limited means of delivery for existing development.</p> <p>Noted, revisions incorporated in supporting text</p> <p>Figures available for the first two months of 2018 see the plug-in car market make up 2.0 per cent of all new cars sold in the UK. This excludes existing cars. There is not currently the evidence to justify requiring 20% provision. An amendment is proposed to make better future provision for flats. As this market grows, the Council will keep this policy under review.</p>	<p>Add the following sentence to paragraph 7.20</p> <p>"The Government's new air quality plan says it will end the sale of all "conventional petrol and diesel cars" by 2040. The car industry anticipate that the uptake will increase rapidly before then with further measures rolled out</p>

	<p>Insist on charging facilities for development with no get outs</p>	<p>The policy requires the provision of charging points.</p>	<p>under the Automated and Electric Vehicles Bill."</p> <p>Add to paragraph 7.22/last sentence "... For flatted development a minimum provision is needed to ensure access to charging facilities. This would normally be 10% subject to demand. <u>If demand is limited provision should take the form of future proofing measures such as appropriate wiring</u>"</p>
<p>Policy TA3</p>	<p>Supports approach to encouraging modal shift and making provision for electric charging points but thresholds need to be clarified/10% minimum provision</p> <p>Support policy but request higher thresholds/20% for flats/min 7Kw support with greater number of charging points required</p>	<p>Noted. Take account of new government approach. Provision is already one per dwelling. An amendment is proposed to make better future provision for flats.</p> <p>Figures available for the first two months of 2018 see the plug-in car market make up 2.0 per cent of all new cars sold in the UK. This excludes existing cars. There is not the evidence to justify requiring 20% provision. An amendment is proposed to make better future provision for flats. As this market grows, the Council will keep this policy under review.</p> <p>Noted</p>	<p>Add to policy TA3 "<u>In addition for new flat schemes need to provide future proofing measures, such as appropriate wiring to ensure that demand for electric vehicles can be met as this increases over time.</u>"</p>

	<p>Support charging point provision/straightforward to put in new buildings/assist AQMA</p> <p>Developers request test of electric charging (a home charge point is £1400)/broadband via Whole Plan Viability Assessment/ensure do not threaten growth delivery</p>	<p>Assessed in Whole Plan Viability Study 2018. Government subsidy (Office for Low Emission Vehicles) also available to housebuilders for this provision.</p>	
7.23	Text supported/reference needed	Already makes reference to relevant documents	No Change
Policy TA4	<p>Concerned Residential Parking Standards document was last updated in February 2013 - two parking spaces for three bed houses inadequate Residential Parking Standards last updated February 2013 and review overdue</p> <p>Refer to locally agreed standards/any such policy identified within the local Neighbourhood Plans</p> <p>Garages should be of adequate size for modern cars, to maximise the use of off street parking.</p> <p>Note policy should go further and support car parking initiatives away from new development that can be accommodated in balance with policy TA2</p> <p>Essex County Council Vehicle Parking Standards were updated in Essex Design Guide</p> <p>To add as identified within the local Neighbourhood Plans/Development Management should not allow discounting</p> <p>Supports policy subject to review of relevant parking standards when</p>	<p>ECC do not propose any further update to its Residential Parking Standards, beyond those published in the new Essex Design Guide.</p> <p>New paragraphs in section 3 are proposed to deal with the interaction between Neighbourhood Plans and the Local Plan.</p> <p>The newly published Essex Design Guide includes appropriate dimensions for garages.</p> <p>Noted but limited means of delivery for existing development.</p> <p>Noted.</p> <p>New paragraphs in section 3 are proposed to deal with the interaction between Neighbourhood Plans and the Local Plan. The merits of individual schemes will be judged on a case-by-case basis.</p> <p>Noted.</p>	No Change

	<p>published</p> <p>Want increased car parking capacity for local people at railway hubs, including Stansted Airport, no new development without parking space for at least two vehicles</p>	<p>Noted, Stansted Airport are keeping car parking provision at the airport under review and the Council expects new parking to be provided in the near future.</p>	
Policy TA5	<p>Large parts of the district are rural/access for public transport difficult/Strategic Road Network 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</p> <p>Support inclusion in policy of reference to Braintree Branch line</p> <p>Amend policy to reference to Walking and Cycling Improvements to Multi-user route improvements enhance multi-user connectivity with definitive Bridleway/No cycle links to Flitch Way</p> <p>Any new development at Stebbing/Little Easton/Dunmow only exacerbate the situation/any new development at Junction 8 should be routed underground</p> <p>Mention the Cambridge to Haverhill Light Railway/new cycle paths/M11 new junctions north of Junctions 8/8A and improvements to Junction 9</p> <p>New cycle paths, e.g. Walden to Hinxton and Wimbish</p>	<p>Noted, assessment of Junction 8 and the rest of the road network in Uttlesford, and beyond including Galleys Corner, shows impacts acceptable with medium term improvement now funded. The Garden Communities will provide new and enhanced public transport routes.</p> <p>Reference already included in policy</p> <p>Disagree, some of these improvements will be to routes that are not designed for different users. The Flitch Way is a Bridleway that can be used by people cycling. All proposed developments should use existing links (access points) onto the Flitch Way. This is not to say that new networks of footpaths and bridleways should not be created around the Flitch Way spine but that no further direct access nodes should be created on to this recreational spine.</p> <p>J8 impacts acceptable with medium term improvement now funded.</p> <p>These measures are not programmed by the highways authority or required to mitigate the growth proposed.</p>	<p>Amend the first policy paragraph to; “The provision of new or enhanced transport infrastructure and initiatives will be pursued and implemented in partnership with the relevant transport providers. Developer funding for or provision of highway and transportation works and measures will be sought as appropriate. The following measures have been identified and others will come forward through assessment of specific sites”.</p> <p>Within Rail improvements include the sentence: “Improved accessibility for rail stations that will serve new developments, including cycle parking,</p>

	<p>Request mention of B1383/strategy to improve the M11 with air quality monitoring in Stansted Mountfitchet</p> <p>Note where Saffron Walden has problems with through traffic and its mitigation it follows, a priori, so does Thaxted</p> <p>Garages should be of adequate size for modern cars to maximise the use of off street parking</p> <p>Limits of district council planning for large scale urban development/ absence of binding commitments from delivery bodies</p> <p>Set targets for traffic reduction, to reduce congestion and emissions, and take account of technology/change over to electric cars</p>	<p>The Uttlesford Cycling Strategy contains a large number of recommended improvements, and this policy cannot reference all of them. The top two priorities from this strategy are included in the policy. Nevertheless, reference to the Strategy should be made within the policy.</p> <p>The B1383/M11 are mentioned in transport study including proposed improvements. The Transport Study contains a large number of recommended improvements, and this policy cannot reference all of them. Nevertheless, reference to the Study should be made within the policy.</p> <p>Noted, the Transport Study includes reference to mitigation measures includes reference to Coordinated mitigation strategy for junctions within Saffron Walden to be identified by the ECC transport study of the town. Appropriate mitigation to be agreed and S106 funding secured from developers through the planning approval process.</p> <p>The newly published Essex Design Guide includes appropriate dimensions for garages.</p> <p>Noted, planning requires working with other authorities. Nevertheless, policy TA5 references “securing the following initiatives”.</p> <p>Essex County Council is the Highways Authority for Uttlesford and would set any overall targets regarding traffic reduction, congestion etc. Essex County Council’s Guidance Notes for a Residential</p>	<p>cycle and pedestrian routes and bus infrastructure.”</p> <p>Add the following sentences to the policy under Walking and Cycling Improvements:</p> <p>“Schemes within the Essex Cycling Strategy and Uttlesford Cycling Strategy”</p> <p>Amend “Local Improvements” section to “Local Highway Improvements” and add the following sentences:</p> <p>“New developments will be assessed for their impacts on the network and where necessary, capacity, safety and enhancements to transport provision will be required from the developer to mitigate the impact on the network or linking to the network, this may include schemes within the Uttlesford</p>
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	<p>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</p> <p>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/Fritch Way improvements/bridleway and the linking route will have bridleway status/ new junction on the M11 after Junction 8a to effectively give a bypass</p>	<p>Travel Plan identifies targets between a 5% and 10% reduction in single occupancy car use over a set period. Alternatively, where baseline data is already considered to be at a reasonable level, it may be accepted that the target should aim to maintain the baseline. For employment ECC targets 3-5% reduction in drive alone commuting. A recent Government announcement anticipates that all new vehicles must be hybrid or electric by 2040.</p> <p>Noted, the Transport Study includes reference to mitigation measures includes reference to Coordinated mitigation strategy for junctions within Saffron Walden to be identified by the ECC transport study of the town. Appropriate mitigation to be agreed and S106 funding secured from developers through the planning approval process.</p> <p>Noted, the Transport Study includes reference to mitigation measures includes reference to Coordinated mitigation strategy for junctions within Saffron Walden to be identified by the ECC transport study of the town. Appropriate mitigation to be agreed and S106 funding secured from developers through the planning approval process.</p>	<p>Transport Study”</p> <p>Add bullet under “<u>sustainable transport walking and cycling improvements</u>” “support sustainable transportation connectivity between Braintree – Stansted and Bishop Stortford.</p>
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Uttlesford District Council – Proposed Response

Chapter 8: Infrastructure

Added text – shown underlined

Deleted text – shown crossed out or struck through

Ref	Key Issue (from overarching summary)	Council’s Response	Change to the plan
<p>Para 8.1 - 8.5</p>	<p>Amend definition of Green Infrastructure/NPPF Annexe 2 - network of multifunctional green space/mention of Places of Worship in paragraph 8.1</p> <p>Generally concurs with the issues raised on water infrastructure although notes impacts on rivers/need for detailed water cycle strategy to verify the assumptions in the stage one WCS. Without a detailed Water Cycle Study before submission plan unsound.</p> <p>Facilities will become more overstretched e.g. education, health, roads, limited public transport. Housing must be accompanied by facilities, but this is not happening with existing growth and new growth with be the same.</p> <p>In considering the potential requirements from development on ECC services and infrastructure reference should be made to the ECC Developers’ Guide to Infrastructure Contributions (2016) or amended versions.</p>	<p>The list in para 8.1 covers broad headings and is not exhaustive. Add reference to NPPF Annexe 2 glossary of definitions.</p> <p>Detailed WCS (part one) shows the impacts of growth and requirements for new sewerage infrastructure. No showstoppers found/add findings to Policies SP6-8. Joint EA/UDC position statement accepts that Thames Area work be completed after submission of the plan/before EIP. Update para 8.3 to include latest studies.</p> <p>The spatial strategy of 3 Garden Communities, by concentrating growth, will provide more facilities than meeting growth needs via small developments</p>	<p>Add reference “ The definition of infrastructure ... Planning Act as amended and <u>NPPF Annexe 2</u>”</p> <p>Update paragraph 8.3 “...<u>Sports Study, detailed Water Cycle Study, Infrastructure delivery plan</u>”</p> <p>Add findings of the detailed WCS to plan Policies SP6-8, and paragraph 8.3 “<u>A detailed WCS has been carried out for the Anglian Area finding that NUGC and West of Braintree are acceptable with no phasing restrictions necessary For the Thames Area (Easton Park) viable solutions have been identified going forward.</u></p> <p>Add to end of Para 8.3“ <u>In</u></p>

			<p><u>considering the potential requirements from development on ECC services and infrastructure reference should be made to the ECC Developers' Guide to Infrastructure Contributions (2016) or amended versions/10 Year plan for school places 2018-26</u></p>
INF 1	<p>Generally concurs with the issues raised with regard to water infrastructure although notes impacts on rivers/need for detailed water cycle strategy</p> <p>Supports the policy/add reference to key education documents to assist it</p> <p>Welcome policy in principle and its intention regards making provision although note that a robust evidence base needs to support it</p> <p>Green infrastructure study is required</p> <p>Pleased to see Green Infrastructure included/need for a Green Infrastructure policy that applies generally to development</p> <p>Infrastructure should consider impacts on heritage assets and their setting, as well as archaeological potential</p>	<p>Noted. Detailed WCS shows that no showstoppers exist as above</p> <p>Noted. Add reference to ECC's Developers' Guide to Infrastructure Contributions/10 Year plan for school places 2018-26 in para 8.4 above</p> <p>Noted/IDP provides the evidence base</p> <p>IDP/3 Garden Community masterplans will address green infrastructure needs of the development</p> <p>Note support/Green Infrastructure covered in Policy INF2 and in the IDP</p> <p>The plan must be read as a whole, policies EN1 to EN7 deal with the impacts on heritage assets. Furthermore, Full Heritage impact assessments carried out for the Garden</p>	<p>Replace Policy INF1 text as below;</p> <p>"Development must take account of the needs of new and existing populations. It must be supported by the timely delivery of infrastructure, services and facilities necessary to meet the needs arising from the development. This is particularly important for the new garden communities.</p> <p>Each development must address physical, community, social and green infrastructure.</p> <p>In assessing capacity, developers will provide</p>

	<p>Support allocations to enable the expansion of the primary school site so that Saffron Primary School can have two forms of entry</p> <p>Existing GP practices in the area do not have capacity to accommodate significant growth although begun to address capacity issues</p> <p>Issues are access to services and cost of public transport</p> <p>Provision of facilities are outside the control of UDC</p> <p>Substantial growth here on a piecemeal but substantial basis, with concerted and imaginative attempt needed to correct the inadequacies in provision</p> <p>Liaison with Braintree Council, East Herts Council and others remain a priority/cumulative impact adequately assessed/health care provision in the accident & emergency site needed/critical in easing opposition to the West of Braintree site support policy but clarify “Delivery in a timely manner” i.e. loophole</p> <p>Timely delivery of infrastructure cannot be achieved until infrastructure requirements properly assessed/costed with potentially crippling costs</p>	<p>Communities assessing impacts.</p> <p>Current planning application off Shire Hill/100 dwellings held in abeyance until receipt of adequate transport evidence</p> <p>Addressed in IDP. UDC has engaged with CCG to see how the Council can assist the CCG</p> <p>The 3 Garden Communities are selected on access to services. The cost of public transport is outside the remit of the Local Plan. However, development that supports increased patronage of public transport routes could help with the viability of such routes.</p> <p>IDP clarifies who makes provision and coordinates resources</p> <p>The Garden Communities will provide coordinated expansion as per IDP and masterplans</p> <p>Ongoing dialogue with LPAs and key stakeholders including on infrastructure needs and provision. Cumulative impacts including those on health provision is adequately assessed through the IDP UDC Infrastructure Delivery Plan. Accident and emergency provision not raised by NHS England but can be considered in GC master</p>	<p>evidence as to whether existing infrastructure can be used more efficiently, or whether the impact of development can be reduced through promoting behavioural change.</p> <p><u>Permission will only be granted if it can be demonstrated that there is sufficient appropriate infrastructure capacity to support the development or that such capacity will be delivered by the proposal in a timely manner. It must further demonstrate that such required capacity will prove sustainable over time physically and financially.</u></p> <p>A combination of funding sources will be sought to deliver the infrastructure required to deliver the spatial strategy. <u>Where a development proposal requires additional infrastructure capacity, to be deemed acceptable, mitigation measures must be agreed with the Council and</u></p>
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	<p>Review INF1 in line with model ECC policy</p>	<p>plans.</p> <p>IDP identifies what infrastructure is required and scale of contribution from proposals. Viability assessment based on the above show all GCs Viable. GCs would make proportionate contributions including to strategic measures.</p> <p>Use elements of model policy in INF1 (that is more exacting than existing) subject to NPPF</p>	<p><u>the appropriate infrastructure provider. Such measures may include (but not exclusively):</u></p> <p><u>Financial contributions towards new or expanded facilities/their maintenance;</u></p> <p><u>Direct provision or construction of new provision;</u></p> <p><u>Off-site capacity improvement works; and/or the provision of land.</u></p> <p><u>Developers and land owners must work positively with the Council, neighbouring authorities and other infrastructure providers throughout the planning process to ensure that the cumulative impact of development is considered and then mitigated, at the appropriate time, in line with their published policies and guidance.</u></p> <p><u>Planning obligations and phasing conditions will be required where necessary</u></p>
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to ensure that development meets the principles of this policy.

The Council may consider introducing a Community Infrastructure Levy (CIL) and would implement such for areas and/or development types where a viable charging schedule would best mitigate the impacts of growth. Section 106 will remain the appropriate mechanism for securing land and works along with financial contributions where a sum for the necessary infrastructure is not secured via CIL.

For the purposes of this policy the widest reasonable definition of infrastructure and infrastructure providers will be applied. Exemplar types of infrastructure are provided in the glossary appended to this Plan.

Exceptions to this policy will only be considered whereby:
•it is proven that the benefit of the development proceeding without full

mitigation outweighs the collective harm;
•a fully transparent open book viability assessment has proven that full mitigation cannot be afforded, allowing only for the minimum level of developer profit and land owner receipt necessary for the development to proceed;
•full and thorough investigation has been undertaken to find innovative solutions to issues and all possible steps have been taken to minimise the residual level of unmitigated impacts; and
•obligations are entered into by the developer that provide for review at appropriate interval(s) and appropriate additional mitigation in the event that viability improves prior to completion of the development.

<p>Paragraph 8.6 - 8.13</p>	<p>Need up to date/robust sports pitch evidence and strategy already deficiency in public green space, sports facilities, allotments meet Angst standards, most settlements within 400 metres of a green space, Fields in Trust guidelines</p> <p>Insufficient provision in Saffron Walden/only 3 public gardens in Uttlesford</p> <p>Rights of way network an essential part of links between green spaces.</p> <p>References on location of additional playing space created</p>	<p>Sports Strategy being prepared with support of Sport England.</p> <p>Addressed in Uttlesford Open Space, Sport Facility and Playing Pitch Strategy (2012) and the Sports Facilities Development Strategy (2016).</p> <p>Noted. The Master plans for the Garden Communities will include additional play space; this will be developed through the DPD process. Other developments will also provide sufficient open space in line with the policy.</p>	<p>No change</p>
<p>Policy INF2</p>	<p>Require provision of natural and semi natural green space</p> <p>Ideally a specific Green Infrastructure Strategy is required/standards needed in the policy on semi natural/natural green space</p> <p>Clarification is required to ensure does not apply to schools/ surplus school fund better education facilities/need for school to expand including on playfields</p> <p>Unclear standards for sports provision/facilities</p>	<p>Garden Communities s will require provision of natural and semi natural green space.</p> <p>Garden Community masterplans in the form of DPDs will identify the approach for each Garden Community.</p> <p>Amend so as to reference the circumstances when this policy would apply to schools playing fields.</p> <p>Detailed standards for sports provision will be set via sports strategy. Reference will be included in the policy text to the new sports study.</p>	<p>Add to Policy INF2 the following new criterion c:</p> <p>“c. In the case of school and college grounds, the loss through development may be permitted where the development meets a demonstrable educational need and protects playing</p> <p>“Uttlesford District Council has, working with Sport England, commissioned a Sports Strategy. Development proposals will</p>

	<p>Protection of allotment land/cannot simply be disposed of/improve standards/note allotments are protected/with duty to protect</p> <p>Standards of allotments not enough/gardens becoming smaller</p> <p>Concerned square footage per person for amenity space is too low/easier for parish to get play facilities via grant than land Provision is far below other LPA standards too low/lacking teeth, over use of management companies/held to ransom/enforcement of standards poor</p> <p>Support policy note/future obligations must be tied to enforcement mechanisms</p> <p>Better car parking needed</p> <p>Most open space standards too onerous/ease thresholds</p>	<p>Policy INF2 already protects allotments. Other restrictions equally apply to other categories</p> <p>The standards recommended in the plan are from the Uttlesford Open Space, Sport Facility and Playing Pitch Strategy (2012) and the Sports Facilities Development Strategy (2016).</p> <p>The Three Garden communities will include significant provision. The standards recommended in the plan are from the Uttlesford Open Space, Sport Facility and Playing Pitch Strategy (2012) and the Sports Facilities Development Strategy (2016). Delivery would be via planning condition or S106.</p> <p>Noted</p> <p>Noted. Car parking is covered by other policies in the plan.</p> <p>The standards recommended in the plan are from the Uttlesford Open Space, Sport Facility and Playing Pitch Strategy (2012) and the Sports Facilities Development Strategy (2016).</p>	<p>take into account the findings of this study and provide new sports facilities in line with the recommendations from this study.”</p> <p>Add the following text after “Open Space Requirements”:</p> <p><u>“... or based on the most up to date standards”</u></p>
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<p>Paragraph 8.14 -8.24</p>	<p>Biggest health issue is lack of hospital beds</p> <p>Extra stress on services/residents</p> <p>ECC recommends paragraph 8.15 includes reference to the Uttlesford Health and Wellbeing Strategy, which also includes specific health targets</p> <p>Paragraph 8.15 Health and Well-being should mention places of worship to be compliant with section 171 of the NPPF/ Health and Well-being should mention places of worship to be compliant with section 171 NPPF</p> <p>Implies wrongly no improvements to walking/cycling</p> <p>Health benefits of horse riding/exercise associated with the care of horses well documented/need more specific requirements for the provision of bridleways/NMUs</p> <p>This needs to be made much stronger. Liaison is inadequate-experience shows health facilities not expanded with demand/nothing to be occupied until such time as infrastructure in place/available as soon as new residents arrive</p>	<p>Noted, the Council consults the West Essex Clinical Commissioning Group on the Local Plan to ensure they are aware of the growth plans and to see how UDC can assist the CCG with their plans.</p> <p>Noted. 3 garden communities will provide new facilities</p> <p>Add Uttlesford Health and Wellbeing Strategy</p> <p>Protection of community facilities including places of Worship are covered by Policy RET4</p> <p>Paragraph 8.19 mentions the benefits of safe walking and cycling routes.</p> <p>Paragraph 8.19 mentions the benefits of active lifestyles, it cannot provide an exhaustive list of active lifestyles.</p> <p>Noted, liaison with health bodies is appropriate. The Clinical Commissioning Group are the body that plans for the provision of health care in the district. The Council does not have the expertise or funding to undertake this activity, and must rely on others in their respective roles.</p>	<p>Add to Para 8.15 after 1st sentence “The Council has prepared the Uttlesford Health and Wellbeing Strategy 2017-22”</p>
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	No evidence of how these aspirations will be delivered	Delivery of these aims will be addressed in the IDP/sports strategy and through working in partnership when development opportunities arise.	
Policy INF3	<p>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</p> <p>Wellbeing as cornerstone to society policy</p> <p>UDC has little or no control over these issues</p> <p>Commends requiring HIA but require other aspects such as design</p> <p>Requirement for HIA/threshold of 10 units/or lower/who advises the HIA once submitted/ECC lead on reviewing/requires further details of process</p> <p>Landowners/developers/retailers concerned policy not justified by evidence, better focused on design of all types of built development at the site</p> <p>Obesity issue/wish to strictly control fast food outlets</p>	<p>Amend to include assessment of how promotes activity</p> <p>Noted</p> <p>Noted, the Health Impact Assessments will require developers to think about these issues and adapt their plans accordingly.</p> <p>Add reference on design ECC in its Public Health role suggests no change to threshold as proposals need to be judged on merits Essex County Council will be consulted on details of HIA. Based on advice from Essex Planning Officers Association .</p> <p>Policy in line with NPPF/add reference on design as above</p>	<p>Replace INF 3 policy text as follows:</p> <p>New developments which are designed, constructed and managed in ways that improve health and promote healthy lifestyles and help to reduce health inequalities in the District will be supported.</p> <p>The following development proposals should undertake a Health Impact Assessment (HIA):</p> <ul style="list-style-type: none"> Residential development (Class C3) proposals of more than of 50

		Noted	<p>units</p> <ul style="list-style-type: none">• Non-residential development of more than 1,000 sqm• Residential care homes and nursing homes (Class C2)• Hot food takeaways (Class A5)• <u>Any application requiring an EIA due to the incorporation of Human Health and Populations from May 2017.</u> <p>The HIA should set out the impact on health and well-being resulting from a proposal and any demands that are placed on the capacity of health facilities arising from the development.</p> <p>Where significant impacts are identified, planning permission will be granted</p>
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			<p>where infrastructure provision and/ or funding to meet the health service requirements of the development is provided and/ or secured by planning obligations.</p> <p>The Council will require HIAs to be prepared in accordance with the advice and best practice for such assessments as published by the Department of Health, <u>Public Health</u> and other agencies, such as the West Essex Clinical Commissioning Group and other NHS organisations across Essex.</p> <p>Restrictions may need to be applied through appropriate planning conditions to reduce any negative impacts occurring in relation to hot food takeaways (Class A5) subject to HIA findings.</p> <p>Early discussion with the Planning team is strongly</p>
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			advised around any HIA. <u>Advice and guidance is available from Public Health and other Health Partners on these.</u>
Paragraph 8.25 – 8.29	Support this 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	Noted Noted Noted/reliant upon providers	No change
Policy INF4	UDC have little or no control over provision/little priority being given by ECC on basics High level technology provision bedrock of expansion in a rural area/correct provision of broadband needed Accepts requirement for high speed broadband/ recognises district's rural nature means alternatives Most broadband should be fibre based/free Wi-Fi in commercial centres Extend out of towns/Villages to more rural locations, address existing deficiencies, essential for all premises	Noted. The Council is reliant upon broadband providers and site developers. However, the Council can put conditions on developments to ensure broadband is provided by developers. Noted Noted Noted Noted the Council is reliant upon providers, however, if developers must provide justification to depart from the policy.	No change

	Supportive in behaviour change, precondition for business, should not prevent development where no connection possible, whole plan viability testing needed	Significant costs will be tested in whole plan viability assessment, developers must provide justification to depart from the policy.	
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Uttlesford District Council – Proposed Response

Chapter 9: Design

Policy D1 and associated paragraphs 9.1-9.7

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
D1	The 'historic environment' should be used and not heritage assets as in text.	Agree- amend text.	Amend second paragraph of Policy D1: "Proposals should also demonstrate how they respond to the landscape, local and longer-views, <u>and</u> the <u>natural and historic</u> environments and historic assets. "
D1	Policy should reference Sport England's and Public Health England's 'Active Design' guidance	Agree- amend text.	Add new paragraph after third paragraph in Policy D1: " <u>Development should result in healthy places which prioritise active travel and provide opportunities for and access to facilities for sport and physical activity.</u> "
D1 and Para. 9.7	The policy should include more reference to Secured by Design	Agree- amend Policy D1 and add new text at the end of Para. 9.7	Addition to the end of the first paragraph in Policy D1: " <u>Development should refer to Secured by Design principles to reduce crime and encourage safer</u>

			<p><u>communities.”</u></p> <p>Add new text at the end of Paragraph 9.7: <u>“Another important aspect of high quality design is community safety, including crime reduction. In order to maximise community safety development should seek to adhere to the guidelines set out in the national Planning Practice Guidance and the Secured by Design guides¹.”</u></p> <p>Footnote - <u>Association of Chief Police Officers - Secured by Design Initiatives design guides</u> www.securedbydesign.com</p>
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Policy D2 and associated paragraphs 9.8

Ref	Key Issue (from overarching summary)	Council’s Response	Change to the plan
D2	Policy should include provision for cycle parking in residential developments	The plan should be read as a whole. Cycle parking is addressed in Policy TA2.	No change.
D2	Further discussion recommended by Essex County Council Environment, Sustainability and Highways to ensure consistency with the SUDs/Flood Risk	Agree- amend text	Add a new sentence at the end of Policy D2:

	Strategy with regards to permeable car parking courts		<u>“The use of permeable surfaces for areas of parking will be promoted.”</u>
D2	Electric charging points should be provided within property curtilages	The plan should be read as a whole. Electric charging points are addressed in Policy TA3.	No change.

Policy D3 and associated paragraphs 9.9

Ref	Key Issue (from overarching summary)	Council’s Response	Change to the plan
D3	Policy should be amended to read <i>“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 <u>and not have a detrimental impact on flood risk”</u>.</i>	The plan should be read as a whole. Policy D8 states that the impact on flood risk from development should be minimised.	No change.
D3	Include the historic environment	This Policy states that development should relate to the surrounding area; this includes the historic environment.	No change.

Policy D4 – Shop Fronts and associated paragraphs 9.10 – 9.12

Ref	Key Issue (from overarching summary)	Council’s Response	Change to the plan
Para 9.10	Shop Front Policy suggested by officers as there was no such policy in the Local Plan	Agreed as this is an important element in contributing to the locally distinctive character of a town or village.	9.10 Shopfronts can contribute much to the locally distinctive character of towns and villages. They are important elements in the townscape and can contribute significantly to the attractive quality of any

			<p>street scene. The design of <u>new</u> shopfronts should reflect this and seek to preserve or enhance the character and appearance of the building and its location. It should respect the design of the building and not obscure, or result in harm to, existing architectural features.</p> <p>9.11 Existing shopfronts that contribute to the appearance or special interest of a building or the street scene should be retained. Particularly in listed buildings or conservation areas, or where they are of design or historic significance in their own right or as part of a group. Any modifications necessary should be sympathetic to the original design.</p> <p>9.12 The Council will seek to protect existing shopfronts that make a positive contribution to the appearance and local distinctiveness of an area, for example through their</p>
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			<p>architectural and historic merit. Special regard will be given to the need to preserve the appearance of shopfronts, taking into account the quality of its design, its historic importance and its location. Good examples of shopfronts should be retained wherever possible.</p>
<p>Policy D4</p>	<p>Proposed new policy for Shopfronts</p>	<p>Agreed as this is an important element in contributing to the locally distinctive character of a town or village.</p>	<p>Insert new policy after existing Policy D3 as follows: <u>“Policy D4 – Shop Fronts</u> <u>The Council will support the retention and enhancement of historic shop fronts and other shop fronts of quality that contribute positively to the character and distinctiveness of the locality and historic environment.</u></p> <p><u>Shopfront alterations which detract from the public amenity due to poor quality design or inappropriate scale, proportions, materials or detailing will not be supported.</u></p> <p><u>Proposals for new shop fronts will be supported where they</u></p>

			<p><u>are of a high quality of design and preserve or enhance the amenity of the locality, including the character and appearance of built and historic environment.</u></p> <p><u>This policy should be read in conjunction with the guidance set out in the Council’s supplementary planning document for shop front design.”</u></p>
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Policy D4 and associated paragraphs 9.10-9.16

Ref	Key Issue (from overarching summary)	Council’s Response	Change to the plan
D4	Major developments required at minimum to provide a sports facility plan/strategy as part of green infrastructure plans	Agree amend text.	<p>Amend second bullet point of Policy D4 as follows:</p> <p>“A development and land use plan showing the mix and type of development to come forward, including the broad locations of necessary supporting</p>

			services, including local centres, <u>open space, play and sports space</u> , health and education.”
D4	Policy should include reference to the historic environment	Agree- Amend text.	Add to third bullet point of Policy D4 as follows: “ <u>Development should demonstrate how it responds to the landscape context and the historic environment.</u> ”
D4	5 th bullet point in Policy D4 be amended to – “A green infrastructure plan setting out the network and typology of green spaces, links, <u>flood mitigation areas</u> and areas of ecological importance” (page 115).	Agree- amend text.	Amend the fifth bullet point of Policy D4 as follows: “A green infrastructure plan setting out the network and typology of green spaces, links, <u>flood mitigation areas</u> and areas of ecological importance.”
D4	Wording of the 3 rd paragraph in Policy D4 to be amended to read – “Development frameworks should be informed by best practice <u>landscape and urban design principles</u> ”	Agree- Amend text	Amend the first sentence of the third paragraph of Policy D4 as follows: “Development frameworks should be informed by best practice <u>landscape and urban design principles.</u> ”
D4	Equestrians should be mentioned and included in Policy D4	The plan should be read as a whole. Equestrian routes will be protected as per Policy TA1.	No change.
D4 and D1	Building for Life 12 Assessments should apply to all developments of 50+houses not just new settlements	Agree. Although reference is made in Policy D4 to Building for Life 12 in relation to the Garden	Add a new second sentence to the first paragraph of Policy D1:

		Communities this should apply to all development not just Garden Communities. Amend text in Policy D1 to include this.	“All new development in Uttlesford should contribute to the creation of high quality places through a design-led approach underpinned by good design principles and reflecting a thorough site appraisal. <u>Development proposals should be informed by Building for Life 12 and other good practice principles.</u> ”
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Policy D5 and associated paragraphs 9.17-9.19

Ref	Key Issue (from overarching summary)	Council’s Response	Change to the plan
D5	Design should be in accordance with an adopted Neighbourhood Plan requirements. Parish councils should be involved in discussions of design.	Design should be in accordance with the development plan which includes made neighbourhood plans, as well as other national and local policy and guidance.	No change.
D5	Concern that the requirement for a design review assessment is too restrictive. The size and complexity of West of Braintree development requires a site-specific solution and this policy may be too restrictive.	The NPPF recommends use of design review panels in assessing development sites.	No change.
D5	Policy D5 needs to clarify a development threshold to trigger the Design Review process	The Design Review process will be ‘triggered’ at the discretion of the Local Planning Authority on a case by case basis. Scale is not the only consideration in triggering the design review	No change.

		process. Location and sensitive sites are also important in the Design Review process.	
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Policy D6 and associated paragraph 9.20

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
D6	Delete last sentence as considered unenforceable and unmanageable	The purpose of this Policy is to encourage, not enforce, the running of design competitions.	No change.
D6	Query on how and who will judge the design competitions	Applicants, landowners and developers are encouraged to run and judge design competitions in partnership with the Council.	No change.
D6	New houses should complement the local area	Agree, however the plan should be read as a whole and other policies in the Plan (e.g. Policy D1) seek to ensure that development, including residential development responds to the local area.	No change.

Policy D7 and associated paragraphs 9.21-9.23

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
Paras. 9.21-9.23	Designs should be in accordance with specific requirements in Neighbourhood Plans	Design should be in accordance with the development plan which includes made neighbourhood plans, as well as other national and local policy and guidance.	No change.
D7, Paras. 9.21-9.23	Queries on how self-build will be identified and how those registered will be notified	The Council is required by legislation to maintain a register of eligible and prospective custom and self-build individuals which informs the local planning authority's decisions in relation to plan-making and the determination of planning applications.	No change.
Para. 9.21	Small plots of land outside villages and conservation areas should be available for development	The Council will consider applications on a case to case basis.	No change.
Para. 9.21	Suggested that larger sites to provide 5% of self-build land	Policy H8 encourages land to be reserved for self-build or custom house building. The use of a percentage target of allocated land for self-build is not supported. It may be that land within larger sites is appropriate but there is no basis for a specific target. Instead it is considered more appropriate to understand the types of plots that are required and ensure that land to meet that demand is identified either as smaller	No change.

		scale allocations or as part of the development plan documents' preparation process for the Garden Communities and shown on the specific masterplans for those sites.	
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Policy D8 and associated paragraph 9.24

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
D8	Wording of the 4 th paragraph of Policy D8 be amended to read, <i>"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."</i> (page 118).	Agree- Amend Policy D8 text to reflect this suggestion.	Amend the fourth paragraph of Policy D8 as follows: "Waste, recycling and storage areas should be provided. Equally, systems that reduce water consumption and allow for the reuse of grey water is encouraged. The impact on flood risk from development should be minimised. Development will not increase flood risk on or off site. "
D8	Policy should be amended to include waste access and provision of waste areas for flats.	This change is not necessary. The policy applies to all types of development. If considered necessary in the future specific guidance can be provided for different types of developments such as flats in the form of	No change.

		Supplementary Planning Documents or Design Guides.	
D8	Green roofs should be encouraged	Agree- amend para 3 of Policy D8 to include reference to green roofs.	Amend the third paragraph of Policy D3 as follows: “This should show how resource efficiencies and climate change adaptation measures will be incorporated through aspects such as the layout of the proposed development, orientation, massing, landscape and building materials. <u>Green roofs, walls and other similar measures are encouraged where appropriate.</u> ”
D8	The policy makes no specific reference to the historic environment or to visual impact and setting	The Plan should be read as a whole. Policy D1 requires proposals for new development to demonstrate how they respond to the landscape, local and longer-views, and the environment. Chapter 10 of the Plan sets out a suite of policies that ensure consideration of the historic environment. Policy C1 addresses the protection of landscape character including visual impact and setting. Development proposals are also	No change.

		required to be in accordance with the NPPF and have regard to national Planning Practice Guidance.	
D8, Para. 9.24	Use of BREEAM Standards and Home Quality Mark is an unnecessary financial burden on developers. New builds should exceed BREEAM.	The policy states that applications should accord with the appropriate standards at the time of submissions. It also encourages the use of the Home Quality Mark, but does not require it.	No change.
D8	Policy needs clarification as it might be misinterpreted as applying to all developments of all scales	This policy does apply to development of all scales. Encouraging sustainability in design and construction of all scales is important.	No change.

Issues for discussion by Planning Policy team/ Members

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
D8	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	Policy D8 does not set local standards but instead encourages new development to embed sustainable design and construction techniques from the outset. The policy acknowledges that development is required to meet Building Regulations but also notes that BREEAM standards may be appropriate. Paragraph 9.26 notes that national Planning Practice Guidance allows	No change.

		latitude for local plans to set local requirements subject to viability.	
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Policy D9 and associated paragraphs 9.25-9.33

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
D9	Proposed 30% improvements on Building Regulations is too high. Suggestion of 10%.	<p>It is considered that the Dwelling Emission Rate target should be challenging whilst realistic. If evidence is provided that this target cannot be met this will be a matter for the local planning authority to consider as part of the development management process. It is proposed to add to Policy D9 that these requirements will apply unless it can be demonstrated that they would make the development unviable.</p> <p>For clarity it is proposed to amend the target to 19% lower than the Target Emission Rate required by the Building Regulations Part L 2013 Edition. This is equivalent to Level 4 of the Code for Sustainable Homes and is in accordance with the 25 March 2015 Ministerial</p>	<p>In the first paragraph of Policy D9 replace "30%" with "19%" .</p> <p>Add a new footnote to the end of the first paragraph of Policy D9 as follows: <u>"Currently Approved Document L1A: Conservation of fuel and power in new dwellings, 2013 edition and Approved Document L2A: Conservation of fuel and power in new buildings other than dwellings, 2013 edition, DCLG March 2014 (as amended)."</u></p> <p>Add a new sentence at the beginning of Paragraph 9.32 as follows: <u>"Government guidance indicates that councils may require compliance with</u></p>

		Statement regarding the setting of technical standards for new housing.	<u>energy standards that exceed the Building Regulations.”</u> Delete the last sentence of Paragraph 9.32.
D9	Request for a specific policy relating to inclusion of renewable technologies in Conservation Areas with regard to historic buildings and wider historic landscape	This is not considered necessary. Chapter 10 of the Plan sets out a suite of policies that ensure consideration of the historic environment. If considered necessary in the future specific guidance can be provided in the form of Supplementary Planning Documents or Design Guides.	No change.
Para. 9.31	Policy wording is considered not strong and assertive enough	The use of a Dwelling Emission Rate target is considered to be clear and challenging whilst realistic.	No change.

Policy D10 and associated paragraphs 9.34

Ref	Key Issue (from overarching summary)	Council’s Response	Change to the plan
D10	Energy demands and carbon dioxide emissions are required to accord with Part L of the Building Regulations	Noted.	No change.
D10	All new housing should be built with solar panels PASSIV housing standard should apply to all social housing delivered by the Local Plan	The use of specific types of renewable energy technologies is a matter for each developer. Policy D10 encourages Passivhaus buildings including social housing.	No change.

D10	All new housing stock should include SMART and green technologies especially superfast or subsequent generations broad band	The Plan should be read as a whole. Policy INF4 considers high quality communications infrastructure and superfast broadband.	No change.
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Uttlesford District Council – Proposed Response

Chapter 10 Environment

Added text – shown underlined

Deleted text – shown crossed out or struck through

Introduction paragraph 10.1-10.5

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
Gen	Lack of environmental assessments on site allocations	The Local Plan is subject to SEA which requires under the regulations to assess the impacts of any developments on the locality and investigate alternative approaches and sites. Furthermore the larger allocations will be subject to EIAs as they are processed through the planning applications.	No change
Gen	Increase in population will result in more additional carbon emissions form additional traffic	Policies TA1 and TA2 recognise the need to reduce travel by car and therefore seek to increase sustainable forms of travel and facilitate sustainable modes of transportation through new developments thereby reducing carbon emissions.	No change
Gen	No overriding case presented for the unnecessary and unsustainable loss of the natural environment to rare species of flora and fauna and wildlife as well as the detrimental impact on the historic environment. This is contrary to NPPF sections 11 and 12.	The current Local Plan is out of date and is being prepared in compliance with NPPF. The Spatial Strategy which focusses growth on three Garden Communities ensures that growth takes place in the most suitable locations where it is needed, where it is deliverable and where it is most sustainable.	No change

Gen	Historic landscape characterisation should be included in the plan	The historic landscape characterisation is provided in the Landscape Character Assessment (Chris Blandford Associates, September 2006). Landscape considerations form part of the planning application determination.	No change
Para 10.1	<ul style="list-style-type: none"> – 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 	Up to date evidence has been provided by the Full Historic Impact Assessment Studies. Full HIAs are being undertaken for the three garden communities. The brief HIAs to three strategic sites are being supplemented to standard agreed by Historic England.	Evidence Base list should refer to the current HIA study 2018.

Protecting the Historic Environment Policy EN1 and associated paragraphs 10.2 -10.5

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
Policy EN1	Historic England welcomes Policy EN1 as it specifically addresses Heritage at Risk.	Noted	Noted
Policy EN1	<ul style="list-style-type: none"> • 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 • Strengthen policy by outlining proactive 	Noted and amended accordingly	<p>Development will be supported where it protects <u>preserves or</u> enhances the significance of any the <u>historic environment.</u> and. and makes a positive contribution to the street scene and/or landscape.</p> <p>Proposals will be favourably considered for the sympathetic and optimum viable</p>

	approach to addressing Heritage at Risk		<p>re-use of heritage assets, particularly where they make a positive contribution to the distinctive character of the local environment and can contribute to the delivery of sustainable development and regeneration.</p> <p>Development proposals for the re-use of heritage assets will be favourably considered where the proposals represent the optimum viable re-use and are consistent with their conservation. <u>In determining applications, the council will require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. Relevant historic environment records should be consulted, and the heritage assets assessed using appropriate expertise where necessary.</u></p> <p><u>Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, the council requires developers to submit an appropriate desk-based assessment and a field evaluation.</u></p>
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			<p>Proposals to modify heritage assets so as to reduce carbon emissions and secure sustainable development will be weighed against harm to the significance of the heritage assets in accordance with appropriate development management policies.</p> <p><u>Proposals to introduce energy efficiency and renewable energy measures affecting heritage assets will be weighed against harm to the significance of the heritage asset and the wider historic environment.</u></p> <p>The Council will work <u>proactively positively</u> to safeguard heritage assets identified as “at risk” on the Local Buildings at Risk Register and national Heritage at Risk Register as “at risk” by <u>where necessary using statutory powers to secure undertake enforcement action on urgent works, issue and repairs as necessary, notices</u> where there is identified harm, immediate threat or serious risk to its <u>the preservation. of a heritage asset.</u></p> <p><u>The Council will continue to work alongside owners and relevant partners including and also by working in partnership with land owners, Essex</u></p>
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			County Council, Historic England and other heritage bodies to secure their a sympathetic restoration and optimum viable re-use.
Policy EN1	Historic landscape characterisation should be included in the Plan	Historic Landscape Characterisation is included in Chapter 11; Countryside Policy C1.	Change 10.02 to read: In Uttlesford the historic environment is a rich, complex and irreplaceable resource. It has developed through a history of human activity spanning many thousands of years. Some of the resource is hidden in the form of archaeological deposits. Other elements such as the historic landscape are the highly visible result of many years of agricultural, industrial and commercial activity and are referenced in Policy C1; <u>Protection of Landscape Character</u> . The “built part of the historic environment is equally rich in towns, villages and hamlets set in the gently rolling countryside. There is a wealth of fine buildings, many of them ancient and listed, and these buildings with their varied styles and methods of construction span many centuries.

Design of Development within Conservation Areas Policy EN2 and associated paragraph 10.6-10.8

Ref	Key Issue (from overarching summary)	Council’s Response	Change to the plan
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Policy EN2	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.	The policy as drafted leaves scope for a balanced decision to be taken when weighing the resultant harm to the significance of the heritage asset against potential public benefits of the proposal.	No change
Policy EN2	The word 'essential' in first sentence implies a less stringent test than that required by the obligatory considerations of statutory provisions.	Agreed. The word 'essential' should be deleted in the first sentence.	Development will be permitted where it conserves or enhances the character and appearance of the essential features of a Conservation Area including plan form, the relationship between buildings, the arrangement of open areas and their enclosure the grain or significant natural or natural or heritage features.
Policy EN2	The character or appearance of the conservation area should be considered irrespective of whether or not it is considered to be essential. Likewise, the word "overall" in bullet point three should be removed.	Agreed. The word overall to be deleted from the third Bullet point.	There is no loss of overall character or historic significance of the Conservation Area.

Protecting the Significance of Conservation Areas Policy EN3

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
Policy EN3	Historic England welcomes inclusion of a specific standalone policy relating to setting of Conservation Areas	Noted	
Policy EN3	EN3 as drafted means development will only be permitted where it is not detrimental to the character, appearance or significance of a	The Policy will have positive impacts on the historic environment adjacent to Conservation Areas to the extent that Listed Buildings would be protected from neighbouring insensitive	No change

	conservation area. This is contrary to the NPPF advice as balancing is required between harm to asset and public benefits.	development. There will also be positive impacts associated with townscape.	
Policy EN3	Policy EN3 conflicts with SP6 at it does not conserve or enhance the character of the conservation area	A Full Historic Assessment of Easton Park has been undertaken and this will inform the development and at masterplanning stage the findings and recommendations will be taken into account.	No change
Policy EN3	NUGC will be damaging to the character, appearance and significance of the Conservation Area within Great Chesterford.	A Full Historic Assessment of NUGC has been undertaken and this will inform the development and at masterplanning stage the findings and recommendations will be taken into account.	No change

Development affecting Listed Buildings Policy EN4 and associated Paragraphs 10.9 – 10.14

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
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<p>Para 10.13</p>	<p>Objection to “.... some measures to improve the energy efficiency of a listed building can be undertaken without the need for consent”.</p> <p>Misleading statement as criteria outlined in policy are not what determine whether or not special interest is preserved and again conflicts with the statutory obligations</p>	<p>Agreed wording to be amended as any works that would affect the special architectural or historic interest of a listed building would require consent.</p> <p>Agreed and sentence referring to policy criteria deleted. Paragraph to read as shown.</p>	<p>Whilst some <u>minor</u> measures to improve the energy efficiency of a Listed Building can be undertaken without the need for consent <u>any works which would affect the special architectural or historic interest of a listed building would require Listed Building consent</u>. If you are considering any works to a Listed Building you are advised to have early discussions with the Council’s Conservation Officer.</p> <p>The policy identifies the criteria which need to be met to make sure there is no loss of the special interest of the Listed Building.</p>
<p>Para 10.14</p>	<p>Wording to be amended to align with NPPF para 128 regarding significance and not reasons for listing</p>	<p>Agreed wording to be amended.</p>	<p>Applications for development affecting a Listed Building need to refer to its historic or architectural importance and explain how the proposed development does not lessen the reasons why the building or structure was listed. <u>describe the significance of the Listed Building or structure affected including any contribution made by their setting and should explain how the proposal would preserve its special character and significance. This should be proportionate to the asset’s</u></p>

			<u>significance.</u>
Policy EN4	<ul style="list-style-type: none"> • 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 	Agreed EN4 para 4 does afford greater weight to renewable energy installations and needs rewording to retain the intention to support renewable energy installations whilst applying the stringent NPPF test.	<p>Development involving the installation of renewable energy equipment on a listed building will be acceptable if the following criteria are met:</p> <ul style="list-style-type: none"> • Locations other than on the a Listed Building have been considered and dismissed as being impracticable; • There is no irreversible damage to significant parts of the historic fabric; and • The location of the equipment on the Listed Building would not detract from cause harm to its character, appearance or significance. ; and • The impact is minimised through design, choice of materials, colours etc.

Scheduled Monuments and Sites of Archaeological Importance Policy EN5 and associated Paragraphs 10.15 – 10.17

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
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Gen	Historic England welcome provision of separate policy addressing scheduled monuments and sites of archaeological interest.	Noted	Noted
Gen	Retitle Policy EN5 as Archaeology to reflect its wider reaching scope.	The title is appropriate as it specifies what it covers.	No change
Policy EN5 Para 1	The policy seems to be seeking to replicate the test embodied in NPPF paragraphs 132-135 but in an inaccurate way. Draft policy as written does not accord with the NPPF.	Noted and amended to accord with NPPF paragraphs 132-135	<p>Where nationally important archaeological assets, whether scheduled or not and their settings are affected by proposed development there will be a presumption in favour of their physical preservation in situ for <u>example through modification of design, layout, drainage, landscaping or the siting and location of foundations.</u> The Council will seek the preservation in situ of archaeological assets unless <u>the need for the development outweighs the importance of the asset it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss or all of the following apply :</u></p> <ul style="list-style-type: none"> • <u>The nature of the heritage asset prevents all reasonable uses of the site; and</u> • <u>No viable use of the site itself can be found in the medium term through appropriate marketing that will</u>

			<p><u>enable its conservation: and</u></p> <ul style="list-style-type: none"> • <u>Conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and</u> • <u>The harm or loss is outweighed by the benefit of bringing the site back into use.</u>
Policy EN5 Para 2	Historic England object to “....in situations where there are grounds for believing that historic assets or their setting would be affected.....”	Agreed and amendment to wording required.. Applicants are required to provide a description of the significance of any heritage assets affected including any contribution to their setting based on evidence and appropriate expertise where appropriate.	In situations where there are grounds for believing that historic assets or their settings would be affected <u>is evidence to suggest that historic assets or their settings would be affected.....”</u>
Policy EN5 Para 3	As drafted Policy requires does not actually require an excavation but provision to be made.	Agreed. As drafted provision can be made without any actual excavation, investigation and recording taking place. Wording needs to be strengthened,	“.....until satisfactory provision has been made for a programme of excavation, investigation and recording has been submitted and agreed by way of a pre-commencement condition.
Policy EN5 Para 4	<ul style="list-style-type: none"> • 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. 	Noted, there are relatively limited circumstances when renewable energy provision will be considered in the context of Scheduled Monument, and consequently the fourth paragraph of the policy is of little value and should be deleted.	<p>Development involving the installation of renewable energy equipment within Scheduled Monuments will generally be permitted if the following criteria are met:</p> <ul style="list-style-type: none"> • There are no reasonable alternatives; • Impact on the fabric is limited and reversible; • The development involves the least damaging type of technology;

			<ul style="list-style-type: none"> • There is no loss of special interest or significance; and • Where free-standing equipment is proposed there is no detrimental impact on the setting of the Monument.
Policy EN5	<ul style="list-style-type: none"> • Historic Environment Assessment for Great Chesterford and Little Chesterford (July 2016) identifies topography as making major positive contribution to setting of Heritage assets 	In accordance with Policy EN5 the setting of heritage assets will be respected and enhanced where appropriate. Full HIA's for NUGC ,West of Braintree Garden and Easton Park have been undertaken and will inform future decisions on siting of development so as to preserve, retain and enhance the significance of settings.	No change

Historic Parks and Gardens Policy EN6 and associated Paragraphs 10.18 – 10.19

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
Para 10.19	<ul style="list-style-type: none"> • Applications to be accompanied by a statement of significance and assessment of proposed development's impact on significance 	Applications do not have to provide reasons for designation of the park/garden. The supporting text should be amended to clarify what is expected in the application.	Applications for development affecting a designated historic park or garden need to refer to the English Heritage Historic England Register and explain how the proposed development does not substantially harm the reasons why the park or garden was designated preserves, and where appropriate enhances the design, character, appearance and historic significance of the District's registered parks and

			gardens and how the proposed development impacts on the significance of the registered parks and gardens.
Policy EN6	<ul style="list-style-type: none"> • 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' • Policy should refer to settings of historic parks and gardens 	Noted and amended to reflect NPPF considerations; material harm deleted and reference to significance of historic parks and gardens.	Development will be permitted provided it sustains and enhances the significance of that no material harm is caused to the special interest of Historic Parks and Gardens such as their principal or associated buildings and structures, formal and informal open spaces, ornamental gardens, kitchen gardens, plantations and water features.

Non-Designated Heritage Assets of Local Importance Policy EN7 and associated Paragraphs 10.20 – 10.22

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
Para 10.21	Helpful to add to supporting text that non designated of archaeological interest and parks and gardens are considered under Policy EN7.	Agreed. The additional text would provide more clarity. Additional text appended as second sentence to paragraph 10.21.	The Council's local List of Heritage Assets identifies assets which although not statutorily listed make an important architectural or historical contribution to the local area and merit protection from development which adversely affect them. <u>Non-designated assets of archaeological interest and parks and gardens are considered under policy EN7.</u>

Policy EN7	Historic England welcomes a separate policy for non – designated heritage assets. The policy is considered clear and accords with NPPF.	Noted	No change.
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Protecting the Natural Environment Policy EN8 and associated Paragraphs 10.23 – 10.24

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
	<ul style="list-style-type: none"> 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 (Natural England) 	<p>Uttlesford District Council has no European or international wildlife sites. In terms of a hierarchy, Sites of Special Scientific Interest (SSSI) will receive the highest protection whilst the value of other sites is protected.</p> <p>Amendments to the policy and paragraph are proposed to reflect the NPPF.</p>	<p>Replace paragraph 10.24 as follows:</p> <p><u>Uttlesford has a range of important sites and habitats for biodiversity, recognised through designations, from national to local importance. Sites of Biodiversity or Geological Importance are identified on the Policies Map and these represent a tiered network for the conservation of biodiversity and geodiversity within the district. There are no European or international wildlife sites in Uttlesford, but there are sites in neighbouring districts and the Council has taken account of the impact of development in Uttlesford on these sites through its Habitats Regulations Assessment. These sites include the statutorily protected national designations (Sites of Special Scientific Interest (SSSIs) and the non-statutorily protected Local Nature Reserves and County Wildlife Sites.</u></p>

			<p>Sites with protected species, important habitats and sites which are important for their historic landscape interest will be protected and where possible enhanced</p> <p>Amend policy EN8 as follows:</p> <p>The Council will seek to optimise conditions for wildlife and habitats to improve biodiversity and tackle habitat loss and fragmentation.</p> <p>Development proposals will be supported where they <u>have regard to the status of</u> protect and enhance sites nationally and locally designated for their importance to nature conservation, ecological or geological value as well as non-designated sites of ecological or geological value. <u>Development proposals will protect and/or enhance the site.</u></p>
	<p>More detail required on how UDC will optimise conditions for wildlife and habitats to improve biodiversity and tackle habitat loss and fragmentation.</p>	<p>Optimisation of conditions for wildlife will be achieved through controlling development and ensuring that the highest level of protection is accorded and enhancement encouraged is</p>	<p>No change</p>

Delete policies EN8 and EN9 and replace with new policy EN8

Policy EN8 - Protecting and Enhancing the Natural Environment

The Council will seek to optimise conditions for wildlife and habitats to improve biodiversity and tackle habitat loss and fragmentation. Development proposals will be supported where they protect and enhance sites nationally and locally designated for their importance to nature conservation, ecological or geological value as well as non-designated sites of ecological or geological value. An ecological survey will be required to be submitted with the application if the development site affects or has the potential to affect any of the following:

- A nationally designated site; For example: SSSI's & National Nature Reserves.
- Locally Designated Sites; For Example: Local Wildlife Sites.
- Protected species;
- Species on the Red Data List of threatened species; and
- Habitats suitable for protected species or species on the Red Data List.

Furthermore, a biosecurity protocol method statement will be required for all development proposals where there is potential to impact sites protected for biodiversity importance to ensure the introduction of invasive non-native species of both flora and fauna is prevented.

Development proposals which would result in significant harm to a biodiversity or geodiversity interest will only be considered after alternative sites that would result in less or no harm have been assessed and discounted. In the absence of alternative sites development proposals must include adequate mitigation measures. Where harm cannot be prevented or adequately mitigated against, appropriate compensation measures will be sought.

To make sure that mitigation or compensation measures, which may include Biodiversity Offsetting, take place these will be secured by conditions or planning obligations upon any approval that may be granted and will need to include financial support for continued maintenance.

If significant harm to biodiversity or geodiversity cannot be adequately mitigated against, or compensated for, permission will be refused. The design of development should incorporate measures to improve the biodiversity or geodiversity value of the development site.

Such measures should include making a contribution to the network of biodiversity sites, including open spaces and green infrastructure and water bodies which make links between habitats and support wildlife. Measures should also attempt to link wildlife habitats together, improving access to, between and across them.

These measures will be secured by condition or planning obligations upon any approval that may be granted and may need to include a biodiversity management plan and financial support for continued maintenance.

Measures to enhance biodiversity should be designed so as not to increase the risk from bird strike to the operation of aircraft at London Stansted Airport; where appropriate the implementation of a bird hazard management plan will be secured by condition or planning obligation.

Protecting and Enhancing the Natural Environment Policy EN9 and associated Paragraphs 10.25 – 10.31

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
	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	Noted, amend paragraph 10.28 to reflect pressures on Hatfield Forest.	Add the following sentences to paragraph 10.28: "Hatfield Forest faces existing pressure from visitors, particularly in the winter months when paths in the forest can be damaged and habitat loss has occurred. Any increase in visitor numbers needs to be carefully managed so as to minimise impact on the forest."
	Environmental protection of Boxted Wood will be impossible with the proposed development of West of Braintree Garden Community	Protection of Broxted Wood will be accomplished through relevant Environmental policies.	No change
	Paragraph 10.29 objective is not included in Policy EN9	Noted	Noted

Protecting and Enhancing the Natural Environment Policy EN9 (

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
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Policy EN9	<ul style="list-style-type: none"> Automatic refusal of planning permission due to a reduction in biodiversity and geodiversity value is not an approach in accordance with NPPF guidance 	<ul style="list-style-type: none"> The Policy is in compliance with NPPF paragraph 118 and does not provide for automatic refusal of permission due to reduction in biodiversity and geodiversity value. Policy makes provision for a planning balance exercise where harm significantly and demonstrably outweighs the benefits will a proposal be refused 	This policy has been reviewed and amalgamated with EN8.
Policy EN9	Paragraph 3 of concern as it allows significant harm to biodiversity and geodiversity	Paragraph 3 ensures that development that causes significant harm must first demonstrate that alternatives have been considered. However, a change is recommended to be clear that development that causes significant harm will not normally be allowed.	This policy has been reviewed and amalgamated with EN8.
Policy EN9	Requirement of a biosecurity protocol method statement is recommended	Agreed. Add requirement to the policy.	This policy has been reviewed and amalgamated with EN8.
Policy EN9	Developments with river frontages not addressed	Disagree. This is outside the scope of the policy.	This policy has been reviewed and amalgamated with EN8.

Traditional Open Spaces and Trees Policy EN10 and associated Paragraphs 10.32 – 10.33

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
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Policy EN10	Definition of traditional open space which policy seeks to protect is not provided	Noted. On reflection the council considers that traditional open spaces includes all open spaces.	Definition should be included in the Glossary.
Policy EN10	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	The information is currently available as Evidence Base on the Council's Website. A new Sports Study is currently being commissioned and will provide up to date comprehensive information.	No change
Policy EN10	Rewrite EN10 show protection for visual and recreational and separate out trees.	Agreed. Policy EN10 rewritten to specifically refer to Open Spaces. Rename Policy as Policy EN 9 – Open Spaces	<p>Policy EN10 – Traditional Open Spaces and Trees</p> <p>Development must not result in any net loss of traditional open space and important tree specimens and should seek to provide net gains.</p> <p>Development proposals which would result in partial, cumulative or total loss of traditional open spaces including village greens or commons and other visually important spaces, woodlands, groups of trees and fine individual tree specimens will only be permitted where the need for the development outweighs their amenity value.</p> <p><u>Policy EN9 - Open Spaces</u> Development proposals will not be permitted which will harm the character of, or lead to the partial,</p>

			<p>cumulative or total loss of protected open spaces including traditional and non-traditional spaces, village greens, commons and other visually important spaces As defined unless:</p> <ul style="list-style-type: none">a. the open space uses can be satisfactorily replaced in terms of quality, quantity and access with an equal or better standard than that which is proposed to be lost; andb. the re-provision is located within a short walk (400m) of the original site. <p>In the case of school, college and university grounds, development may be permitted where it meets a demonstrable educational need and does not adversely affect playing fields or other formal sports provision on the site.</p> <p>Where replacement open space is to be provided in an alternative location, the replacement site/facility must be fully available for use before the area of open space to be lost can be redeveloped.</p>
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Ancient Woodland and Protected Trees Policy EN10 and associated Paragraph 10.33

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
Para 10.33	Title to read: <u>Ancient Woodland and Protected Trees</u>	Supporting text should be inserted.	<p><u>10.33 The NPPF encourages local authorities to protect ancient woodlands and veteran or aged trees. Ancient woodland is defined as an area that has been continuously wooded since at least 1600AD and such areas exist within Uttlesford. Veteran trees are particularly valuable for biodiversity due to the large amount of deadwood that they may contain. These trees are defined by Natural England to be, 'A tree which because of its great age, size or condition is of exceptional value culturally, in the landscape or for wildlife.'</u></p> <p><u>10.34 Ancient woodlands and veteran trees represent an important constituent of green corridors across the district since they have a high inherent biodiversity value.</u></p>

Policy EN10	Wording for New Policy	New policy EN10 on ancient woodlands and protected trees	<p><u>Development resulting in the partial, cumulative or total loss or deterioration of ancient woodland (as shown on the Policies Map) or veteran trees found outside ancient woodland or visually important groups of trees and fine individual specimens, will only be permitted unless the need for, and benefits of, the development in that location clearly outweigh the loss.</u></p> <p><u>Development proposals affecting ancient woodland or veteran trees will be expected to mitigate any adverse impacts, and to contribute to the woodland's or veteran tree's management and further enhancement via planning conditions or planning obligations.</u></p>
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Minimising Flood Risk Policy EN11 and associated Paragraphs 10.34 – 10.10.37

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
Para 10.34	Paragraph not consistent with national policy on the Guidance for Flood Risks and Coastal Change (DCLG 2014)	Some amendments made except that there is no tidal flooding in Uttlesford and therefore the text should only refer to fluvial.	All development should be located in areas at low risk of <u>all forms</u> of flooding. The main risk in the District is from river or fluvial flooding. Development in certain locations can

			<p>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 <u>fluvial</u> flooding. The scale of development required in the Local Plan period can be provided on land which is at the lowest risk of <u>fluvial</u> flooding and all new built development is expected to be located in this zone. <u>When locating development and placing development within a site, all forms of flooding should be considered.</u> The sequential test will be used to ensure new development takes place in the areas with the lowest probability of <u>all forms</u> 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” <u>(paragraph 10.34, page 132).”</u></p>
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Para 10.35	NPPF,NPPG: Flood Risk and Coastal change require a site-specific risk assessment and is not a requirement of the Environment Agency's Standing Advice	See NPPF para 103	A site-specific flood risk assessment will be required for new development sites
Para 10.35	Text omits that Essex County Council Environment, Sustainability and Highways as Lead Local Flood Authority for Essex requires submission of a drainage strategy for review for all major development.	Agreed amend text to reflect this requirement.	A site-specific flood risk assessment will be required for new development sites in accordance with the Environment Agency's Standing Advice. All <u>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.</u> 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.
Para 10.36	Quoted references not up-to-date	Agreed and references updated.	The Uttlesford Strategic Flood Risk Assessment (SFRA)(2016) and the Environment Agency's fluvial flood risk maps <u>Risk Surface Water Flooding Maps</u> show the flood risk across the District.

Para 10.36	Essex County Council is the Lead Local Flood Authority for Essex.	Amend and replace Essex County Council with Essex County Council Environment, Sustainability and Highways as Lead Local Flood Authority	Essex County Council Environment, Sustainability and Highways as Lead Local Flood Authority for Essex
Policy EN11	Reference should be made to Environment Agency's Risk Of Water Flooding-Map	Noted and amended	A sequential approach will be applied to all proposals in order to direct development to areas at the lowest probability of <u>all forms</u> of flood risk which is Flood Risk Zone 1 on the Environment Agency Flood Map <u>Environment Agency's Risk of Water Flooding-Map</u> in order to avoid flood risk to people and property, unless the proposal has met requirements of the sequential test and the exception test.
	A drainage strategy should be submitted for all major developments in accordance with the Essex SuDs Design Guide	Agreed and amended with addition of the suggested wording after last sentence	A drainage strategy should be submitted for all major developments in accordance with the Essex SuDs Design Guide.
Policy EN11	The policy should refer to the role of Essex County Council Environment, Sustainability and Highways as the Lead Local Flood Authority.	Role of Essex County Council Environment, Sustainability and Highways as the Lead Local Flood Authority mentioned in paragraph 10.36.	No change
Policy EN11	Development opportunities in Flood Zone 3, functional flood plain are restricted irrespective of developer submitting a flood risk assessment and mitigation measures.	Agreed and amended	<u>Development in Flood Zone 3b, the functional flood plain, must accord with those categories in Table 3 Flood Risk Vulnerability Classification which are described as appropriate for this Flood Zone'</u>

Policy EN11	Request to see specific reference to foul drainage and sewage treatment	All new development proposals will need to demonstrate that adequate foul water treatment and disposal exists or can be provided in time to serve development.'	No change
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Surface Water Flooding Policy EN12 and associated Paragraphs 10.38 – 10.39

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
Para 10.39	Paragraph 10.39 should be amended to refer to Essex SuDs Design Guide instead of SuDs guidance	Agree, the policy should make reference to the Essex Design Guide.	Applicants should take account of the SuDs <u>Essex SuDs Design Guide produced by Essex County Council in accordance with the Flood and Water Management Act 2010 or other relevant guidance.</u>
Policy EN12	Exclusion of car parks and hard standings from incorporation of SuDs queried	Agreed, it is SuDs should be incorporated into all forms of development including hard standings and car parks, where appropriate.	Amend policy as follows: All new development excluding extensions, car parks and hard standings will incorporate Sustainable Drainage Systems (SuDS) 
	Essex County Council Environment, Sustainability and Highways queries UDC's information on an increase in water pollution associated with SuDs because SuDs do not increase pollution.	SuDs do not lead to an increase in water pollution and the policy should not imply they do. However, SuDS may not be appropriate if there are known contamination issues on site, or if the soil drains poorly and would inhibit the use of infiltration SuDS but not the use of	Amend policy as follows: <u>"Only where there is a significant risk of pollution to the water environment, SuDS may not be appropriate if there are known contamination issues on site, or if the soil drains poorly and would inhibit the use of infiltration SuDS but not the use of attenuation SuDS.</u>

		attenuation SuDS.	<u>Only where there are inappropriate soil or geological conditions and/ or engineering difficulties, should alternative methods of drainage be considered.</u>
	Reference should be made to Environment Agency's climate change allowances and the appropriate allowance should be included within approved drainage schemes.	Policy EN12 mentions optimum run-off rates based on relevant or national standards . national and these allowances are easily accessible from the Environment Agency's website.	No change
Policy EN12	Manchester Airport Group (MAG) recommends that the last policy paragraph should refer to long-term maintenance of SuDS systems as well as bird hazard management plan.	Agreed and amended	SUDs systems should be designed so as not to increase the bird hazard risk or the safe operation of London Stansted Airport or the movement of aircraft; where appropriate the implementation <u>of a long-term maintenance of SUDs plan</u> and of a bird hazard management plan will be secured by condition or planning obligation.

Protection of Water Resources Policy EN13 and associated Paragraphs 10.40 – 10.45

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
Policy EN 13	Environment Agency is generally supportive of the policy as the comprehensive coverage and wording of policy complements Environment Agency's internal water resources policy.	Noted	No change

Policy EN 13	<p>Changes to 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</p> <p>Any additional requirements need to be fully evidenced and the Local Planning Authority should consider the impact of using standards as part of the Local Plan Viability Assessment</p>	<p>Noted</p> <p>This policy seeks to promote positive impacts on resource use and infrastructure provision where the policy ensures that new development will only be permitted if it is fully supported by water infrastructure and also seeks to minimise the consumption of water.</p>	<p>Noted</p> <p>No change</p>

Minerals Safeguarding Policy EN14 and associated Paragraph 10.46

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
Policy EN14	Through Reference to Essex Minerals Local Plan 2014	Additional threshold needed and included as third bullet point	<ul style="list-style-type: none"> • 5 hectares for sand and gravel • 3ha for chalk and • <u>Greater than 1 dwelling of brickearth brick clay</u>
Policy EN14	Policy is a duplication of policy in the adopted Essex Minerals Local Plan 2014 and for modification of policy required to clarify relationship between the	Agreed. Clarification provided by addition of a sentence after second paragraph	Consultation with the Essex County Council as the Minerals Planning Authority must be undertaken on development exceeding these

	two policies.		thresholds in accordance with the adopted Minerals Local Plan.
Policy EN14	<ul style="list-style-type: none"> • Policy considered too onerous and not in accordance with NPPF paragraph 143 • Blanket policy seeking to refuse development where minerals will be sterilised is therefore contrary to guidance 	The policy as drafted does not appear to cover all the permutations outlined in NPPF para 143. The policy seeks to ensure that consideration of minerals is undertaken through the planning process, and it does prevent development in all circumstances.	<p>Proposed policy rewording</p> <p>Where development proposals fall within a Minerals Safeguarding Area the Local Planning Authority will consult the Minerals Planning Authority where the site is greater than :</p> <ul style="list-style-type: none"> • 5 hectares for sand and gravel • 3ha for chalk and • <u>Greater than 1 dwelling of brickearth brick clay</u> <p>Within these mineral safeguarding areas identified, planning permission will not be supported for any form of development that is incompatible by reason of scale, proximity and permanence with working the minerals, unless the applicant can demonstrate to the satisfaction of the Minerals Planning Authority that:</p> <ul style="list-style-type: none"> • The mineral concerned is no longer of any value or has been fully extracted. • The full extent of the mineral can be extracted satisfactorily prior to the incompatible development taking place.

			<ul style="list-style-type: none"> • The incompatible development is of a temporary nature and can be completed and the site returned to its original condition prior to the minerals being worked. • There is an overarching need for the incompatible development that outweighs the need to avoid the sterilisation of the mineral resource. • That prior extraction of minerals is not feasible due to the depth of the deposit. • Extraction would lead to land stability problems.
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Environmental Protection Paragraph 10.47

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
Para 10.47	No provision of credible strategy for tackling air pollution and traffic congestion in Saffron Walden	Noted, an Air Quality Management Area has been declared in Saffron Walden and any development will be expected to contribute to a reduction in levels of air pollutants within the AQMA in line with policy EN16.	No change

Para 10.47	UDC not taking into account cumulative effects of new development	The Environment Act 1995 provides for ways to deal with cumulative impacts and no purpose would be served by replicating this legislation and policy already in place.	No change
Para 10.47	Saffron Walden cannot sustain the level of development without serious infrastructure improvements	Noted, only limited growth is planned in Saffron Walden.	No change

Pollutants Policy EN15 and associated Paragraphs 10.48 – 10.51

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
	Attention to be paid to schools and hospitals in proximity to airport due to additional air and road traffic generated by Stansted Airport	This policy seeks to control pollution and minimise instances where pollution negatively impacts on sensitive receptors.	No change
	Compensation to listed buildings of significant heritage importance to facilitate repairs caused by increased pollution and air traffic vibration	Noted	No change
	Noise assessments should be undertaken on a 24-hr basis so as to assess cumulative impacts on directly affected towns and villages	Noted	No change

Pollutants Policy EN15 and associated Paragraphs 10.48 – 10.51

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
Policy EN15	Proposed addition of, "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."	Ensuring removal of pollutants from construction sites and verification of clearance of pollutant storage areas is currently done through planning permission conditions and site monitoring from start to completion of construction.	No change.
Policy EN15	Recommendation to reconsider some of the policy provisions as well as Essex SuDs Design Guide and successor documents	Noted	Noted

Air Quality Policy EN16 and associated Paragraphs 10.52 – 10.53

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
	Objection to policy as it does not include provision for measurement or mitigation as well as not mentioning the impact of new development	The policy refers to the UDC Air Quality Technical Guidance wherein information is provided on Air Quality Assessments and Determining Significance of Impacts.	No change

	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	Amended policy proposed	See new policy below
<p>Policy EN16 - Air Quality</p> <p>Development will be permitted where it can be demonstrated:</p> <p>It can be demonstrated that That is it does not lead to significant adverse effects on health, the environment or amenity from polluting or malodorous emissions, or dust or smoke emissions to air; or</p> <p>Where a development is a sensitive end-use, that there will not be any significant adverse effects on health, the environment or amenity arising from existing poor air quality, as set by national objectives, targets and emission limits for pollutants, or sources of significant odour.</p> <p>Specifically a Applicants , where reasonable and proportionate, according to the end use and nature of the area and application, must also demonstrate that:</p> <ul style="list-style-type: none"> • <u>There is no adverse significant effect on air quality in an Air Quality Management Area (AQMA) from the development;</u> • <u>Pollution levels within the AQMA will not have a significant adverse effect on the proposed use /users;</u> • <u>Development has regard to relevant UDC Air Quality Technical Guidance.</u> • <u>Development within or affecting an Air Quality Management Area (AQMA) will also be expected to contribute to a reduction in levels of air pollutants within the AQMA. The development will not lead to an increase in emissions, degradation of air quality or increase in exposure to pollutants at or above the health based air quality objective;</u> • <u>Any impacts on the proposed use from existing poor air quality, are appropriately mitigated;</u> • <u>The development promotes sustainable transport measures and use of low emission vehicles in order to reduce air quality impacts of vehicles;</u> 			

Applicants shall, where appropriate prepare and submit with their application, a relevant assessment, taking into account guidance current at the time of application.

Where development proposals would be subject to unacceptable air quality standards or would have an acceptable impact on air quality standards they will be refused.

Where emissions from the proposed development are prescribed by EU Limit values or national objectives the applicant will need to assess the impact on local air quality by undertaking an appropriate air quality assessment and detailed modelling exercise having regard to guidance current at the time of the application to show that the national objectives will still be achieved.

Larger development proposals that require a Travel Plan and Transport Assessments/Statements as set out in Policy TA1 will be required to produce a site based Low Emission Strategy. This will be a condition on any planning permission given for any proposed development which may result in the deterioration of local air quality and will be required to ensure the implementation of suitable mitigation measures.

~~Development has regard to relevant UDC Air Quality Technical Guidance;~~

~~Development within or affecting an Air Quality Management Area (AQMA) will also be expected to contribute to a reduction in levels of air pollutants within the AQMA;~~

~~The development does not prevent compliance with national objectives, targets and standards for pollutants;~~

~~Any sources of emissions to air, odours and fugitive dusts generated by the development are adequately mitigated to prevent loss of amenity for existing and future occupants and land uses; and~~

~~Any impacts on the proposed use from existing poor air quality, odour and emissions are appropriately mitigated.~~

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
Policy EN17	Policy is supported	Noted	Noted

Noise Sensitive Development Policy EN18 and associated Paragraphs 10.55 – 10.57

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
Policy EN18	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	Agreed and amended to include “unacceptable levels”.	The occupiers of surrounding land or the historic and natural environment is exposed to <u>unacceptable</u> adverse levels of noise.
Policy EN18	Policy EN18 in conflict with SP6 due Easton Park being affected by noise pollution from nearby Stansted Airport	Proximity to Stansted Airport will entail being affected by noise but Policy EN18 seeks to ensure against unacceptable adverse levels of noise pollution. Easton Park lies outside the required noise contours for residential development.	No change.
	West of Braintree development will be located in an area of maximum noise and air pollution since it is under the eastbound flight path of aircraft departing Stansted Airport	Proximity to Stansted Airport will entail being affected by noise but Policy EN18 seeks to ensure against unacceptable adverse levels of noise pollution. West of Braintree lies outside the required noise contours for residential development.	No change
	Policy fails to mention how the London Stansted Noise Strategy and Action Plan may be breached by the proposed airport expansion and impact on the Garden Community located adjacent to the airport	Any aircraft noise resulting from the expansion of Stansted Airport is governed by 4 tiers of regulation i.e. International Civil Aviation Organisation (ICAO), European Regulation (European Civil Aviation Conference (ECAC); National (DfT, DEFRA, CAA) UDC through planning conditions and obligations. Stansted Airport has to comply with noise regulations of the above mentioned bodies.	No change

	Proposed Stansted Airport expansion to 44.5mppa will worsen the pollution	Noted	No change
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Light Pollution Policy EN19 and associated Paragraphs 10.58 – 10.59

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
Para 10.59	Requirement to specify criteria on design	By considering external light proposals on a case by case basis against the latest national guidance and lighting standards including the Guidance Notes for the Reduction of Obtrusive Light GN01:2011 will ensure that the proposals respond to the requirements of each area. Design criteria in this case would be very general and serve no purpose.	No change.
	Policy is in conflict with SP6 due to proximity of Easton Park to High Wood SSSI	The lighting proposal that will eventually be approved for Easton Park will ensure minimum adverse impact of light pollution from artificial lighting on local amenity and intrinsically dark landscapes and nature conservation.	No change
	Boxted Wood "one of the darkest areas in the district" will be destroyed by the local plan	The lighting proposal that will eventually be approved for Easton Park will ensure minimum adverse impact of light pollution from artificial lighting on intrinsically dark landscapes and nature conservation.	No change

	NUGV proposal does not address adverse impact on the landscape and surrounding communities of light pollution from a highly visible development.	The adverse impact of light pollution on the landscape and surrounding communities will be fully addressed at the detailed planning level.	No change
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Uttlesford District Council – Proposed Response

Chapter 11 Countryside

Added text – shown underlined

Deleted text – shown crossed out or struck through

Introduction paragraph 11.1-11.12

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
Para 11.2	Development is depleting countryside, destroying natural habits and demolition of historic rural buildings.	The scale of development during the Local Plan period will impact on the countryside. However, the distribution of development, together with Environment and Countryside policies will ensure that the impacts on the countryside, natural habitats and historic environment are mitigated.	No Change

Protection of Landscape Character Policy C1 and associated paragraphs 11.3 -11.6

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
Policy C1	Policy does not seek landscape enhancement and refers to 'material harm' and changing wording is recommended.	Agreed wording changed.	<ul style="list-style-type: none">• No material harm is caused to <u>It preserves or enhances</u> the historic settlement pattern, especially scale and density and that is uses materials and colours that complement the landscape setting and landscape character. Such development should be well integrated with the surrounding landscape;• No material harm is caused to <u>It</u>

			<p><u>preserves or enhances</u> the landscape pattern and structure of woodland areas, hedgerows and individual trees and does not diminish the role they play in views across the landscape;</p> <ul style="list-style-type: none"> • No material harm is caused to <u>It preserves or enhances</u> the historic landscape character of field patterns and field size, greens, commons and verges; • No material harm is caused to <u>It preserves or enhances</u> the form and alignment of protected historic lanes; and • <u>It preserves or enhances the landscape significance and better reveals cultural and heritage links.</u>
Policy C1	NUGC regarded as in conflict with Policy C1 principles regarding settlement pattern, scale, density and cross views	NUGC land has been allocated for development in the Local Plan and is not included in the definition of Countryside. However, a Full Historical Impact Assessment has been undertaken and at Masterplanning stage the appropriate densities and policies will be taken into consideration. As a consequence the NUGC development will be in accordance with Policy C1 and other relevant Policies.	No change

<p>Policy C1</p>	<p>Policy Approach restricting development on basis of material harm regardless of significance of harm and potential mitigation is contrary to NPPF paragraph 14</p>	<p>Agreed and wording changed to be in accordance with NPPF paragraph 14. Policy C1 will read as shown.</p>	<p>Development will be permitted provided that:</p> <ul style="list-style-type: none"> • No material harm is caused to <u>It preserves or enhances</u> the historic settlement pattern, especially scale and density and that is uses materials and colours that complement the landscape setting and landscape character. Such development should be well integrated with the surrounding landscape; • No material harm is caused to <u>It preserves or enhances</u> the landscape pattern and structure of woodland areas, hedgerows and individual trees and does not diminish the role they play in views across the landscape; • No material harm is caused to <u>It preserves or enhances</u> the historic landscape character of field patterns and field size, greens, commons and verges; • No material harm is caused to <u>It preserves or enhances</u> the form and alignment of protected historic lanes; and • <u>It preserves or enhances the landscape significance and better</u>
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			<u>reveals cultural and heritage links.</u>
Policy C1	Policy considered overly restrictive and fails to recognise positive improvements and mitigations that development can provide	Agreed. Wording changed to reflect flexibility	Changed to above wording.
Policy C1	Development of all three proposed Garden Communities will cause all the harms that Policy C1 is seeking to protect against	Full Historic Impact Assessments have been undertaken and used to inform the masterplans of each garden community. The development of each Garden Community will be will be in accordance with Policy C1.and all relevant policies within the Local Plan.	No change

Re-use of Rural Buildings Policy C2 and associated paragraph 11.7

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
Policy C2	Policy welcomed by historic England as it will protect / enhance heritage assets and also protect the character of the countryside.	Noted	No change

Change of Use of Agricultural Land to Domestic Garden Policy C3 and associated paragraph 11.8

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
Para 11.8	Permitted development rights should not be included on agricultural land that is changed to garden use.	The Policy requires flexibility to allow consideration on a case by case basis and conditions removing permitted development rights will be imposed where considered	No change

		appropriate.	
Policy C3	Policy required to ensure that domestic gardens cannot be used for house building or domestic infilling in the form of annexes.	Policy C3 stipulates that permission would be granted if it does not result in a material change in character and appearance of the countryside.	No change

New Community Facilities within the Countryside Policy C4 and Paragraph 11.9

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
Para 11.9	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.	Agreed and UDC as member of the Essex Rural Partnership we should be referring to the said documents.	11.9 In line with the Essex Rural Strategy 2016 – 2020 (RCCE 2016) and successor documents published by Essex Rural Partnership the Council seeks to promote vibrant, mixed and sustainable rural communities.
Policy C4	Suggestion to add 'indoor and outdoor sports facilities' to the list in paragraph.	Agreed to include 'indoor' in list of facilities.	The provision of new or replacement <u>indoor and outdoor sports facilities</u> , recreational or community facilities is acceptable beyond development limits.