

Uttlesford District Council – Proposed Response

Chapter 1: Introduction

Comments made generally on Chapter 1 and comments on paragraphs 1.1-1.19

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
CH1	<p>Concern that the audit trail for the Local Plan is incomplete including the Local Plan Sustainability Assessment process, including the transparency and availability of data, the interim SA Environment Report and some supporting decision-making evidence.</p>	<p>The Local Plan preparation process has been clearly documented through reports to the District Council’s Planning Policy Working Group, which are all public documents available on the Council’s website: http://uttlesford.moderngov.co.uk/ieListMeetings.aspx?CommitteId=141</p> <p>The decision-making process is also documented through reports to the District Council’s Cabinet, which are all public documents available on the Council’s website: http://uttlesford.moderngov.co.uk/ieListMeetings.aspx?CommitteId=136</p> <p>The Local Plan is also supported by an extensive evidence base which is also available on the Council’s website. https://www.uttlesford.gov.uk/localplanevidence</p> <p>An independent Sustainability Appraisal process incorporating Strategic Environmental Assessment has been undertaken throughout the preparation of the Local Plan. The Sustainability Appraisal Scoping Report and the SA Environmental Report of the Issues and Options were both published in 2015. The Regulation 18 Draft Plan Sustainability Appraisal published in 2017. All the reports are available on the Council’s website: https://www.uttlesford.gov.uk/article/4130/Sustainability-appraisal#SA-REG18</p>	<p>No change required.</p>

CH 1; Paras. 1.13- 1.16	Concerns over traffic congestion as a result of Garden Communities.	Infrastructure will be provided in conjunction with the garden communities. A key principle of garden communities is that they rely on sustainable transport links to reduce reliance on the car.	No change required.
CH 1	Concern that the consultation period is undemocratic as it was undertaken in the school holidays.	Consultation was held in accordance with the statutory requirements and the Council's Statement of Community Involvement. The Regulation 18 Draft Plan consultation took place over a period of 7 and a half weeks rather than the usual 6 weeks in recognition of the summer holiday period. There will be a further opportunity to comment on the plan as it progresses.	No change required.
CH 1; Paras. 1.1- 1.4; Paras. 1.13- 1.16	Concern that the SA does not consider reasonable alternatives, especially in regard to the garden communities.	The purpose of the SA is to assess the extent to which the emerging plan will help to achieve relevant environmental, economic and social objectives when assessed against reasonable alternatives. Reasonable alternatives have been considered. The SA is an iterative process and will be updated if other reasonable alternatives come forward.	No change required.
CH 1; Paras. 1.1- 1.4; Paras. 1.11- 1.12	Concern that housing in the garden communities will not meet NPPF sustainability requirements.	Sustainable development in the NPPF includes: making it easier for jobs to be created in towns and villages; moving from a net loss of biodiversity to achieving net gains for nature; replacing poor design with better design; improving the conditions in which people live, work, travel and take leisure; widening the choice of high quality homes. The garden communities seek to achieve sustainable development through all of the above.	No change required.
CH 1; Paras. 1.1- 1.4; Paras. 1.11- 1.12	Questioning how housing targets have been reached	UDC has worked closely with its housing market area partners to prepare a SHMA which identifies an objectively assessed housing need for the area. Paragraphs 3.39-3.45 of the Regulation 18 Draft Local Plan explain this in more detail. Further information is also set out in the SHMA reports which form part of the Local Plan evidence and are available on the Council's website.	No change required.

Paras. 1.1-1.4; Paras. 1.5-1.10	The role of Neighbourhood plans.	<p>The role of neighbourhood plans is set out in paragraphs 1.7 – 1.8 of the Regulation 18 Draft Local Plan.</p> <p>An additional section will be included in Chapter 3 to explain the important role of Neighbourhood Plans in setting out in more detail how a community wishes to see its area develop.</p>	Add an additional section to Chapter 3 explaining the important role of Neighbourhood Plans.
Paras. 1.1-1.4	Questioning whether UDC have fulfilled Duty to Cooperate requirements, in particular with South Cambridgeshire District Council.	The co-operation is ongoing and will be detailed in the Duty to Cooperate Compliance Statement that accompanies the Plan. Further details of co-operation to date with duty to co-operate bodies, including South Cambridgeshire District Council, is available on the Council's website.	No change required
Paras. 1.1-1.4	The Reg 18 consultation only took into account written comments, rather than oral comments given at forums. This excludes certain groups of people.	Officers were present at the forums to answer queries. If help was required in forming and writing representations council officers were available to help with this.	No change required.
Paras. 1.5-1.10	Clearer referencing and explanation of technical terms	A glossary is provided in Section 15 of the Regulation 18 Draft Plan that explains technical terms. Footnote and references have been included throughout the Plan.	Review the referencing in the plan to see where it can be improved.
Paras. 1.13-1.16	Suggestion that waste management should be included in the Plan to identify where significant improvements can be achieved.	Policy D8: Sustainable Design and Construction of the Local Plan already refers to requiring new development to embed sustainable design and construction techniques from the outset as well as requiring development proposals to show how resource efficiencies and climate change adaption measures will be incorporated. The policy also requires waste, recycling and storage areas to be provided, as well as systems that reduce water consumption/ recycle water and maximising opportunities for using on-site renewable forms of energy. Together with the policies set out in the adopted Essex and Southend Waste Local Plan (October 2017) and national policy it is considered the Regulation 18 Draft Local Plan adequately sets out the approach to waste management and specifically identifies areas for improvement.	No change required.
Paras. 1.13-	UDC should include a Recreational Disturbance Avoidance and Mitigation	The need for disturbance and mitigation strategies for the garden communities will be considered through discussions with Natural England	No change required.

1.16	Strategy for recreational activities that will result from the garden communities.	as part of the preparation of the Development Plan Documents and the implementation process for the Garden Communities themselves. Policy SP5 is considered to provide adequate safeguards along with the other policies of the Plan as well as the NPPF and national Planning Practice Guidance.	
Paras. 1.13-1.16	The SA should be available for consultation	The SA was subject to public consultation at the same time as the Regulation 18 Draft Local Plan. The SA of the Pre-Submission Plan will also be published for public consultation at the same time as the Pre-Submission Plan.	No change required.
Para. 1.17	Reference to the Glossary is incorrect	Agree – typographical correction to the text required.	Amend the second sentence of Paragraph 1.17 as follows: “However, it does contain some technical language so there is a Glossary of Terms and Abbreviations in Section 14 <u>15</u> to help readers with the range of new terms that have been introduced.”
Paras. 1.17-1.19	Suggestion that a summary should be introduced to show the policies that are being replaced.	A detailed table with replacement policies is included in Appendix 1 of the Plan.	No change required.

Uttlesford District Council – Proposed Response

Chapter 2: Spatial Portrait, Vision and Objectives

Comments made generally on Chapter 2 and comments on paragraphs 2.1-2.20

“Straight forward” Proposed Changes

Added text – shown underlined

Deleted text – shown crossed out or struck through

Ref	Key Issue / Comment	Council’s Response	Change to the Plan
CH2	The vision should mention travel and transport	The vision does include reference to travel and transport, addressing: environmentally sustainable alternatives to the car; and improvements to strategic transport routes. More detail is provided in Chapter 7 - Transport in the Plan.	No change required.
CH2	Concern expressed over the lack of green space and sport facilities	Evidence studies in the past have identified a deficiency in the amount of public open space and the number of sports facilities, therefore increasing access to these is a key priority. These studies are currently being updated and their findings will be reflected in the Local Plan as well as the Development Plan Documents that will be prepared for the Garden Communities and	No change required.

		through Supplementary Planning Documents if required. The Council will also have regard to the most up to date evidence of open space and sport facilities deficiencies when considering planning applications.	
CH2	Concern over growth levels and evidence base used to inform housing numbers	UDC has worked closely with its housing market area partners to prepare a SHMA which identifies an objectively assessed housing need for the area. Paragraphs 3.39-3.45 of the Regulation 18 Draft Local Plan explain this in more detail. Further information is also set out in the SHMA reports which form part of the Local Plan evidence and are available on the Council's website.	No change required.
Para. 2.4	Reference for the population figure needs providing.	Agree - amend text.	In the last sentence of Paragraph 2.4 replace "85,100" with "86,200". Reference to be added in a footnote: <u>"Office of National Statistics Population Mid Year Estimate 2016 (NOMIS)"</u>
Para.	Sustainability of the loss of agricultural land/ natural environment in relation to	The National Planning Policy	No change required.

<p>2.4; Paras. 2.18- 2.19</p>	<p>the Garden Communities.</p>	<p>Framework sets out a presumption in favour of sustainable development. The NPPF requires that Local Plans should meet the objectively assessed housing needs of an area unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. The Sustainability Appraisal (SA) of the Regulation 18 Draft Local Plan considered the impact of each of the garden communities against a set of sustainability criteria. The SA assessed each garden community against objective 13 (efficient use of resources) and the score was “strong prospect of there being significant positive impacts”. For objective 4 (sustainable use of land) the garden communities all score “strong prospect of there being minor positive impacts”. The policies set out in the Regulation 18 Local Plan seek to ensure that any impacts of development are minimised and where impacts are unavoidable mitigation is provided as far as possible to reduce impacts and provide enhancements or</p>	
---	--------------------------------	--	--

		improvements.	
Paras. 2.4-2.17	Objections to transport links being described as 'good'.	Paragraph 2.6 states that transport links to the District from London by road and rail are good. This is considered to be an accurate description of the rail services and the nature of the highway network. It is acknowledged in Paragraph 2.15 of the Regulation 18 Draft Plan that the District faces a number of challenges in terms of connectivity and accessibility.	No change required.
Paras. 2.4-2.17; Para. 2.20	Sustainability of the garden communities in regard to traffic and pollution and accompanying sustainable transport options.	Infrastructure will be provided in conjunction with the garden communities. A key principle of garden communities is that they rely on sustainable transport links to reduce reliance on the car. Development Plan Documents will be prepared for the Garden Communities which will consider transport options and delivery in more detail including mitigation measures to address potential impacts of development.	No change required.
Paras. 2.4-2.17; Paras. 2.18-2.19	Availability of employment opportunities/infrastructure in the garden communities.	Garden communities will provide a range of employment opportunities. Infrastructure will be delivered in tandem with the garden communities. Development Plan Documents	No change required.

		will be prepared for the Garden Communities which will provide more detail of the type of employment to be provided and the accompanying infrastructure. These plans will be supported by the Council's Economic Strategy.	
Para. 2.11	Questioning why Brownfield sites are not the priority for development	Due to the rural nature and history of Uttlesford there are relatively few previously developed or brownfield sites within the District. The Site Allocations do include a number of fully or partly brownfield sites for development.	No change required
Para. 2.19	Questioning whether Objective 2 (providing employment opportunities at Stansted Airport) is a contradiction of UDC's position on objecting to the second runway.	UDC recognises the importance of London Stansted Airport to provide opportunities for employment growth but this should be within the context of a single runway airport.	No change required.
Para. 2.20	Concern over the provision of affordable housing for local people	Affordable housing provision is based on the needs assessment in the SHMA. Policies H6 and H7 of the Regulation 18 Draft Plan set out a target and supportive policies to bring forward affordable housing. One of the garden community principles is the provision of mixed tenure homes and housing types that are genuinely affordable for	No change required.

		<p>everyone. The development plan documents for the garden communities as well as supplementary planning documents and the Council's own Housing Strategy will work together to ensure the delivery of a wide of housing including affordable housing in the garden communities and across the District.</p>	
<p>Paras. 2.18, 2.19</p>	<p>Representations support the aspirations for high quality design, however question how this will be ensured.</p>	<p>Section 9 of the Regulation 18 Draft Plan sets out a suite of policies that seek to guide the design of all development across the District. These policies include a number of measures that can ensure high quality design including adherence to the policies themselves through the planning application process, the preparation of development frameworks/ design codes, the application of Building for Life 12 assessments, Design Reviews, application of design standards and energy targets. Furthermore, the Development Plan Documents that will be developed for the Garden Communities will set out high aspirations for design in the</p>	<p>No change required.</p>

		new Garden Communities.	
Para. 2.19	Proposed Change Objective 1: change words to “ensuring high quality design” and delete “resisting poor”.	Agree - amend text.	Amend Objective 1e, first bullet: “ <u>Ensuring high</u> resisting poor quality design solutions, promoting best practice and celebrating Success:”