

## Uttlesford District Council – Proposed Response

### Chapter 3: Spatial Strategy

#### Paras: 3.1- 3.3 and general comments on Chapter 3

Ref	Key Issue / Comment	Council's Response	Change to the plan
<b>Chap 3 Para 3.2</b>	Concerns over traffic congestion as a result of the new developments	The Local Plan sets out specific policies to ensure the provision of infrastructure in the District overall but particularly the garden Communities in the specific Garden Community policies and in Chapter 8 – Infrastructure of the Local Plan. This will be supported by the Infrastructure Delivery Plan which will be a “living” document – this means it will be regularly updated in consultation with infrastructure and service providers including Essex County Council, the NHS and the water companies. The specific Garden Community Development Plan documents will provide more detail about the type, timing, cost and delivery of infrastructure.	No change.
<b>3.2</b>	Concerns over the loss of countryside	The National Planning Policy 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	No change.

		mitigation is provided as far as possible to reduce impacts and provide enhancements or improvements.	
<b>3.2</b>	Concerns over the lack of infrastructure ie. health, education.	The Local Plan sets out specific policies to ensure the provision of infrastructure in the District overall but particularly the garden Communities in the specific Garden Community policies and in Chapter 8 – Infrastructure of the Local Plan. This will be supported by the Infrastructure Delivery Plan which will be a “living” document – this means it will be regularly updated in consultation with infrastructure and service providers including Essex County Council, the NHS and the water companies. The specific Garden Community Development Plan documents will provide more detail about the type, timing, cost and delivery of infrastructure.	No change.
<b>Chap 3</b>	Concern over the absence of any proposals for a SPV.	The exact form of the delivery of the Garden Communities is yet to be determined.	No change.
<b>Chap 3</b>	Questioning where the evidence base is to show when and where the housing is needed.	This evidence can be found in the SHMA, which provides evidence of the need and demand for housing based on demographic projections and establishes the Objectively Assessed Need for housing. This can be accessed on the District Council’s website at the following link: <a href="https://www.uttlesford.gov.uk/CHttpHandler.ashx?id=5344&amp;p=0">https://www.uttlesford.gov.uk/CHttpHandler.ashx?id=5344&amp;p=0</a>	No change.

## Uttlesford District Council – Proposed Response

### Chapter 3: Spatial Strategy – Policy SP1 and associated Paragraphs

#### Policy SP1 and associated paragraphs

Added text – shown underlined

Deleted text – shown crossed out or struck through

Ref	Key Issue / Comment	Council's Response	Change to the plan
SP1	Clarification sought as to the definition of “sustainable development” and “presumption in favour of sustainable development” specifically for the local context. Suggestion that Policies S1 and S12 could be combined.	The National Planning Policy Framework includes a presumption in favour of sustainable development. The NPPF indicates that local plans should be based upon and reflect the presumption in favour of sustainable development and that they should contain clear policies that will guide how the presumption will be applied locally. The Planning Inspectorate have issued a presumption in favour of sustainable development model policy. Policy SP1 is based on the Planning Inspectorate's model policy wording which is in accordance with the NPPF. Policy SP12 sets out the local principles that development should follow in order to be	No change.

		considered to be sustainable. Policies SP1 and SP12 have different purposes so it would be inappropriate to combine them into one policy.	
<b>SP1</b>	Concerns raised regarding the following part of Policy SP1: 'where there are no policies relevant to the application, or relevant policies are out of date at the time of making the decision, the Council will grant permission unless material considerations indicate otherwise'. The concern was that this position would undermine the Local Plan.	The National Planning Policy Framework includes a presumption in favour of sustainable development. The NPPF indicates that local plans should be based upon and reflect the presumption in favour of sustainable development and that they should contain clear policies that will guide how the presumption will be applied locally. The Planning Inspectorate have issued a presumption in favour of sustainable development model policy. Policy SP1 is based on the Planning Inspectorate's model policy wording which is in accordance with the NPPF.	No change.
<b>SP1</b>	Suggestion that the third paragraph of Policy SP1 currently states that where no policy, permission will be granted. Suggest this should be amended to: "where no policy, Council will determine one in order for the application to be determined".	The proposed change would not be in accordance with the NPPF.	No change.
<b>SP1</b>	Policy SP1 goes further than the NPPF provides. In particular it states: "The Council will always work proactively with applicants jointly to find solutions which mean that proposals will be approved wherever possible". This should be amended to refer only to proposals which would achieve sustainable	It is considered to be unnecessary to include specific reference to sustainable development in the second	No change.

	development.	sentence of Policy SP1 as it is already included in the first sentence of the Policy. The Planning Inspectorate have issued a presumption in favour of sustainable development model policy. Policy SP1 is based on the Planning Inspectorate's model policy wording which is in accordance with the NPPF.	
<b>SP1</b>	Questioning what is meant by "sustainable development".	Sustainable development is defined in the Glossary to the Regulation 18 Local Plan as well as in the National Planning Policy Framework.	No change.
<b>SP1</b>	There are many instances of weak wording that need to be strengthened in the Plan. In relation to Policy SP1 it is suggested that UDC could work proactively with applicants AND "communities" to jointly find solutions [second sentence of first paragraph of Policy SP1].	Agree- amend text.	Amend the second sentence of the first paragraph of Policy SP1 as follows: "The Council will always work proactively with applicants <u>and communities</u> jointly to find solutions..."
<b>SP1</b>	Questioning what 'Applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise' mean?	Material considerations are the matters that are relevant to deciding a planning application. The scope of what can be a material consideration is very wide but in general they must relate to the purpose of	No change required

		planning legislation and should not relate to the protection of purely private interests.	
<b>Para 3.4</b>	<p>The general content and policy direction of Policy SP1 is supported. It is however noted that paragraph 3.4 defines the key criteria against which the sustainable credential of a development should be assessed. It is considered that the need to actively encourage developments to make the efficient use of land by promoting the re-use of previously developed (brownfield) land should be included within the text. In order for the supporting text and Policy SP1 itself to be compliant with national policy, and therefore pass the tests of soundness, it is suggested that the following text change is needed to paragraph 3.4 [suggested additional text shown underlined]:</p> <p>“... This includes: building a strong, competitive economy, <u>making the efficient use of land by promoting the re-use of previously developed (brownfield) land</u>, ensuring the vitality of town centres: supporting a prosperous rural economy, promoting sustainable transport; supporting strong vibrant and healthy communities and protecting and enhancing the natural, built and historic environment...”</p>	Agree – amend text.	<p>Amend the fourth sentence of Paragraph 3.4 as follows:</p> <p>“This includes: building a strong, competitive economy, <u>making the efficient use of land by promoting the re-use of previously developed (brownfield) land</u>, ensuring the vitality of town centres; ...”</p>

## Uttlesford District Council – Proposed Response

### Chapter 3: Spatial Strategy

#### Policy SP2 and supporting text including Map 1 – Key Diagram

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
<b>SP2</b> <b>3.16</b> <b>3.17</b> <b>Map</b> <b>1</b>	Concern that the necessary infrastructure to service the new garden communities (such as schools, roads, sewage, water, health care) will not be provided.	The Local Plan sets out specific policies to ensure the provision of infrastructure in the District overall but particularly the garden Communities in the specific Garden Community policies and in Chapter 8 – Infrastructure of the Local Plan. This will be supported by the Infrastructure Delivery Plan which will be a “living” document – this means it will be regularly updated in consultation with infrastructure and service providers including Essex County Council, the NHS and the water companies. The specific Garden Community Development Plan documents will provide more detail about the type, timing, cost and delivery of infrastructure.	No change.

<b>SP2</b>	There is a lack of transparency on how the Garden Community sites were selected.	Sites have been selected through the SHLAA and the Sustainability Appraisal. These can be found in the Local Plan Evidence base section of the UDC webpage.	No change.
<b>SP2</b>	Concern that not enough affordable housing or bungalows will be built to meet local need.	<p>Policy H6 sets out the requirements for affordable housing and ensures that developments on sites of 11 or more dwellings will be required to provide 40% of the total number of dwellings as affordable housing. This responds to the identified need in the SHMA and the OAHN.</p> <p>Policy H10 states that provision will be made for housing, including bungalows, that meets the needs of the ageing population and those with disabilities. The supporting text states that the provision of 1 and 2 bed bungalows will be supported.</p>	No change.
<b>SP2</b>	Suggestion that Wendens Ambo and Elsenham could provide an appropriate location for development, given their proximity to existing rail links.	The settlement hierarchy and the distribution of development set out in the Draft Regulation 18 Plan has considered a range of factors. Proximity to existing rail stations is not considered alone to be an appropriate reason for	No change.



		locating development.	
<b>SP2 3.15</b>	Concern over out commuting from garden communities if employment opportunities are not provided.	Chapter 5 of the Plan sets out the employment strategy over the plan period. This notes that each of the Garden Communities will deliver a range of employment opportunities on site. This is also reflected in the individual policies for each Garden Community (Policies SP6, SP7 and SP8). The exact scale and nature of the employment opportunities will be determined through the Development Plan documents that will be prepared for each Garden Community.	No change.
<b>SP2</b>	The policy does not refer to the importance of the historic built environment. It is requested that the policy is amended to ensure that reference is made to the enhancement and conservation of the historic character of settlements.	Policy SP2 sets out the spatial strategy, i.e. where development will be located, at a high-level or strategic scale. The factors that will be taken into account when considering development proposals are set out in other topic or place specific policies in the Plan and do not need to be repeated in Policy SP2. Chapter 10 – Environment sets out specific policies in relation to the historic environment.	No change.
<b>SP2</b>	Suggestion that the LPA should adopt the CIL rather than S106s.	The Council are considering adopting a Community	No change.

		Infrastructure Levy. This would operate alongside Section 106 agreements in accordance with legislation and national policy.	
<b>SP2</b>	Policy should be amended so that there is no assumption of hierarchy for development in SW and should state “the majority of development will be at the new Garden Communities at Easton Park, West Braintree and North Uttlesford followed by development at the towns of Saffron Walden and Great Dunmow”	Policy SP2 sets the top of the development hierarchy as Saffron Walden, Great Dunmow and the new garden Communities. This reflects the fact that these five settlements will be the main settlements in Uttlesford District and will provide the majority of new development over this Plan period. No hierarchy is proposed between Saffron Walden and the other main settlements.	No change.
<b>SP2</b>	Clarification is sought on the role of existing village design statements and neighbourhood plans in determining planning applications and delivering development to support local services.	Neighbourhood Plans and village design statements play an important role in setting out in more detail how a community wishes to see its area develop, and all planning applications will be determined in accordance with the Development Plan which is the Uttlesford Local Plan and any Neighbourhood Plans that have been made.  An additional section will be included in Chapter 3 to explain the important role of Neighbourhood Plans in setting	Add an additional section to Chapter 3 explaining the important role of Neighbourhood Plans.

		out in more detail how a community wishes to see its area develop.	
<b>SP2, Map 1</b>	The Plan fails to recognise the important role that Bishop's Stortford plays for residents in the south west of the district and Policy wording should be updated to reflect this.	The importance of Bishops Stortford is recognised as an important key centre outside the District in paragraphs 2.6, 3.32, 6.6 and 6.9.	No change.
<b>SP2</b>	Elsenham New Settlement performs comparatively better against a number of key criteria than NUGC.	The Elsenham proposal has been considered in the SLAA and the SA. It is not considered that the proposal performs better compared than the Garden Communities proposed in the Draft Regulation 18 Plan.	No change.
<b>SP2</b>	The client's land in Stebbing should be included in part or whole of to meet a range of housing needs within the village and surrounding smaller communities.	The land in question was considered in the SLAA. The site is considered unsuitable as development on this site would not contribute to sustainable patterns of development.	No change.
<b>SP2 3.15</b>	Concern that there is an overreliance on Stansted Airport as an employment site	The employment strategy is outlined in Chapter 5 of the Local Plan. Stanstead Airport is an important part of this strategy but not the only element.	No change.
<b>SP2</b>	Questioning why UDC has not determined its housing need in talks with Brentwood Borough as they have unmet housing need.	Brentwood is not in the West Essex and East Hertfordshire HMA. Brentwood has not requested that Uttlesford District accommodates any of its housing needs so this is not a matter for Uttlesford to consider as part of	No change.

		the preparation of this Local Plan.	
<b>SP2</b>	Questioning why the houses at the closing Garrison in Wimbish are not included in the draft plan.	The Carver Barracks are due to close in 2031, therefore this site will only become available towards the end of the plan period. This site was not submitted in the Call for Sites and so was not evaluated for its development potential in the SLAA.	No change.
<b>SP2</b>	Suggestion that 1. 2. And 3. should be amended to a. b. and c.	Agree. For clarity amend the text.	Amend the second set of bullet points in Policy SP2 to a), b) and c) rather than 1, 2 and 3.
<b>3.5 3.15 3.16 3.17</b>	Concern that UDC will fall short of its stated annual housing requirement due to the complexity of the Garden Communities and the required infrastructure.	The Council will work closely with infrastructure and service providers and other relevant partners to identify infrastructure needs and to make sure these needs are met. Phasing of development will need to be considered to take account of infrastructure and this will be outlined in the Garden Community Development Plan documents and the accompanying masterplans. The Plan also makes provision for a range of other housing sites which will together with the	No change.

		Garden Communities ensure that the annual housing requirement is met.	
<b>3.5</b>	The Council's approach to site selection does not align with sustainable development as there are no sites in the smaller villages	The Type A and Type B villages will provide almost 700 new dwellings over this plan period. In addition, the Plan acknowledges that these settlements are suitable for a scale of development that would reinforce their role as service. An allowance of 1,190 dwellings has been included in the Plan for small unidentified windfall sites, some of which could come forward in the smaller villages. Neighbourhood plans could also identify sites in these smaller villages.	No change.
<b>3.6</b>	Para. 3.6 to be reworded to ensure sustainable development.	Agree. Add reference to sustainable development to more accurately reflect the spatial strategy.	Amend the first sentence of Paragraph 3.6 as follows:  "The strategy is to <u>encourage sustainable development, enabling</u> enable the local economy to thrive and prosper ..."
<b>3.7</b> <b>3.13</b> <b>3.15</b> <b>3.16</b> <b>3.17</b>	Concern that the rural character of the area has not been kept in regard to the new garden communities.	Chapter 9 sets out the design policies.  Policy D1 notes that all new development in Uttlesford	No change.

		<p>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. All buildings, spaces and the public realm should be well-designed and display a high level of architectural quality which responds positively to local context.</p> <p>Policy D4 requires that development frameworks and design codes are prepared for the strategic development sites and new garden communities. This will cover building heights, depths, widths, street typologies and landscape treatments. This will help to ensure that the new communities are sympathetic to their rural setting.</p>	
<b>3.8</b>	Suggestion that archaeology should be included in paragraph 3.8 to align with the NPPF.	Agree- amend text	<p>Amend the first sentence of Paragraph 3.8 as follows:</p> <p>“The strategy provides for a robust approach to the protection of historic and natural assets and a range of development</p>

			management policies are included to protect listed buildings, conservation areas, Sites of Special Scientific Interest (SSSI), <u>and sites of archaeological interest.</u> ”
<b>3.8</b>	Seeking clarity as to what design standards will be adhered to.	<p>Chapter 9 sets out the design policies.</p> <p>Policy D1 notes that 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. All buildings, spaces and the public realm should be well-designed and display a high level of architectural quality which responds positively to local context.</p> <p>Policy D4 requires that development frameworks and design codes are prepared for the strategic development sites and new garden communities. This will cover building heights, depths, widths, street typologies</p>	Reference will be included in the Local Plan to the new Essex Design Guide – see Chapter 9.

		and landscape treatments.  Reference will be included in the Local Plan to the new Essex Design Guide – see Chapter 9.	
<b>3.10</b>	Suggestion that the Plan refer to more than just aircraft noise in relation to Aircraft Pollution	Policies SP11, EN15, EN16 and EN19 address pollution including aircraft noise and particulate emissions.	No change.
<b>3.13</b>	Suggest para. 3.13 is amended to reflect that the Garden Communities are included in the Corporate Plan. Proposed Change: Add ‘and in alignment and accordance with UDC’s Corporate Plan.’	The Corporate Plan covers the period 2017-2021. It does not have the same statutory weight as this Local Plan or and subsequent Local Plans.	No change.
<b>3.15</b>	The total number of homes in the West of Braintree Garden Community is not yet an absolute number which is how it is reflected within this text. At present the BDC Local Plan estimates a range of between 7,000 and 10,000.	It is considered appropriate to include one number for the capacity of the West of Braintree Garden Community in order to provide clarity. It is acknowledged that through the preparation of the Garden Community Development Plan Document the site capacity will be refined and more reduce.	No change.
<b>3.15</b>	Sustainable transportation should be promoted and facilitated throughout the Local Plan. It is recommended that the sentence in bullet 2 be amended to read: ‘Located close to the A120 this garden community will be conveniently located by including sustainable transport options to Braintree and London Stansted Airport for employment opportunities.’	This change is not necessary as sustainable transport is already included in Policy SP5 – Garden Communities and Policy SP8 – West of Braintree Garden Community.	No change.
<b>SP2</b> <b>3.14</b> <b>3.18-</b>	Over-reliance on large strategic housing allocations which may not be deliverable within five years. Need for additional sites to be identified for housing.	The Plan makes provision for a range of other housing sites which will together with the	The additional site allocations are set out in Chapter 12 – Residential



3.23		<p>Garden Communities ensure that the annual housing requirement is met and the five year housing land supply deliverable.</p> <p>Additional sites are allocated at: Felsted, Great Dunmow, Great Easton, Henham, Newport, Thaxted and Saffron Walden.</p>	<p>Site Allocations and included in amended Policy SP3 – The Scale and Distribution of Housing Development.</p>
SP2	<p>Concern that the allocations in close proximity to Hatfield Forest SSSI will increase visitor pressure on the SSSI and in turn affect the paths and vegetation. The plan should demonstrate that the housing allocation proposed can be delivered without impacting on the SSSI.</p>	<p>The National Trust has produced a study looking into recreational impacts on Hatfield Forest. This makes various recommendations including the provision of alternative space on new developments to provide alternative destinations. The Council has been working with the National Trust on this study.</p>	<p>Reflect the situation in paragraphs 10.30-10.31.</p>
SP2	<p>Suggestion that Stansted Airport should not be allowed further growth beyond 35m passengers per annum until infrastructure improvements have been made. It is suggested that the plan should reflect this.</p>	<p>The government’s draft aviation strategy sets out the approach to how the government, working with their partners can help airports and the industry to grow in a way that is sustainable; increases competition and offers consumers greater choice and a quality experience. The planning system and Uttlesford District Council must take into account government policy.</p> <p>It would not be appropriate to</p>	<p>No change required</p>

		put a cap on growth at Stansted Airport in the Uttlesford Local Plan, given the government's desire to support sustainable airport growth. Policy SP11 in the plan sets out the criteria by which to judge applications at the airport.	
<b>SP2</b>	Suggestion that the plan should promote a brownfield first approach. A CPRE report found that the capacity of brownfield land to deliver housing has been underestimated.	As Paragraph 2.9 of the Draft Regulation 18 Plan states Uttlesford has relatively few previously developed and brownfield sites so it would not be possible to meet the housing need by adopting a brownfield first approach.	No change.
<b>SP2</b>	Questioning the robustness of the economic viability study: for example: A505 Newmarket Rd/A1301 (capacity) – roundabout junction improvements (PBA) is listed as costing £1 million, but South Cambridgeshire's Transport study lists the cost as £7.5-11 million pounds. Both the unlisted costs and the underestimated costs together mean that the costs of this development have been seriously misrepresented.	The A505 Newmarket Road/ A1301 (capacity) roundabout junction improvements cost is £1.5 - £2 million whilst the Junction 10 M11 costs are £7.5 - £11 million.	No change.
<b>SP2</b>	Hatfield Heath is surrounded by Green Belt, and therefore requires specific consideration for how to deliver growth and meet its ongoing needs.	It is considered appropriate for Hatfield Heath to remain as a Key Village in recognition of the range of services and facilities it provides whilst acknowledging that the opportunities for it to grow are limited as it is surrounded by Green Belt.	No change.
<b>SP2</b>	Land to the West of Mill lane presents an opportunity to make a contribution to the much-needed houses required to support Hatfield Heath, on previously developed land that does not contribute to the role of the Green Belt.	This is dealt with under chapter 12.	No change.

<p><b>SP2</b> <b>3.15</b> <b>Map</b> <b>1</b></p>	<p>Concern over the loss of Andrewsfield an important employment site and site of historical importance in the area.</p>	<p>The West of Braintree Garden Community would provide a range of employment opportunities which, depending on the final form of the garden Community, could compensate for loss of employment at Andrewsfield or, if the Airfield was to be retained, compliment it.</p> <p>There would be opportunities to recognise the historical importance of Andrewsfield as part of the Garden Community.</p>	<p>No change.</p>
<p><b>SP2</b></p>	<p>Suggestion of a new sub paragraph to Para 3 "Enabling the re-drawing of village envelopes to render villages a coherent shape within their countryside and locality."</p>	<p>The Council considers that the existing development limits remain appropriate. Development limits can be reviewed through the preparation of neighbourhood plans.</p>	<p>No change.</p>
<p><b>SP2</b></p>	<p>Suggestion that the delivery rates at the garden communities should be higher to match that of Braintree BC and South Cambridgeshire DC</p>	<p>The Council has reviewed the delivery rates of the Garden Communities and adjusted them to reflect a higher maximum build rate. This higher build rate was informed by a review of build rates elsewhere and the views of the promoters. However, as the Council has decided to produce DPDs, which add a greater degree of control</p>	<p>Amend housing trajectory to reflect higher maximum build rates and a later start date.</p>

		but take longer to produce, the start date for completions on Easton Park and North Uttlesford have been pushed back a year.	
<b>3.6</b> <b>3.7</b> <b>3.15</b>	Concern over the loss of agricultural land that results from the West of Braintree development.	As stated in Paragraph 2.10 of the Regulation 18 Draft Plan Uttlesford is a highly productive arable farming area with most of the agricultural land classified as Grade 2 (very good) with rest forming Grade 3 (good to moderate). The West of Braintree Garden Community site is predominantly a mix of Grade 2 and Grade 3 agricultural land. It is considered that the loss of Grade 2 and any Grade 3a agricultural land is justified to meet the objectively assessed housing need and due to a lack of reasonable alternatives that are in accordance with national policy.	No change.
<b>3.10</b>	Concern that the Countryside Protection Zone has previously been ignored by UDC. More assurance is sought on the sincerity of the CPZ.	The Local Plan sets out the Council's position in relation to the Countryside Protection Zone and proposals in the CPZ will be considered in accordance with Policy SP10. The Council has recently completed a review of the CPZ that recommended no changes to the boundaries.	No change.

<p><b>3.16</b></p>	<p>Since the Reg 18 plan was produced an additional 85 permissions have been granted in Saffron Walden. This needs to be reflected in the next draft of the plan (the allocation needs to be reduced by 85 dwellings and extant permissions increased by 85).</p>	<p>Noted. Policy SP3 and the supporting text will be updated to reflect the latest position in relation to planning permissions and completions.</p>	<p>Policy SP3 and the supporting text will be amended to reflect the latest position in relation to planning permissions and completions.</p>
<p><b>SP2</b> <b>3.12</b> <b>3.14</b> <b>3.18-</b> <b>3.23</b></p>	<p>Objections to a number of villages being classed as Type A villages: Stebbing, Quendon, Rickling, Great Chesterford, Stansted Mountfitchet, Thaxted, Takeley and Elsenham.</p> <p>Suggestions that Wendons Ambo, Widdington, Felsted and Ugley should be allocated for more housing, due to having adequate services to support development.</p> <p>Suggestion that Felsted should be classed as a Type A village.</p> <p>Suggestion that Stansted Mountfitchet should be recognised as more than just a Key Village, as it has more services than other key villages.</p> <p>Suggestion that UDC should reconsider the settlement hierarchies so as that more development can occur in Type A Villages.</p> <p>Suggestion that the Market Towns tier in the hierarchy is redefined to reflect the cross-boundary importance of the fringe of Bishop’s Stortford.</p> <p>Objection to the Settlement Hierarchy set out as it is not clear how the distribution strategy was selected.</p>	<p>The village hierarchy reflects the services and facilities each village offers to residents. There will not always be an exact fit between the villages in the same place in the hierarchy, but generally each village fits into its place in the hierarchy.</p> <p>As described in the text, Key Villages include day to day shopping, GP services, primary education, public houses, community halls and regular bus services to other keys villages, nearby towns and London Stansted Airport. Type A Villages have a primary school and some local services, e.g. village hall, public house or shop.</p> <p>The Council considers that the villages are appropriately classified to reflect their level of services and their function as a service provider. The development strategy does not</p>	<p>No change.</p>

		specify particular limits on development in individual settlements, but instead provides guidance as to the appropriate level of development in general terms.	
<b>3.15</b>	Plan needs to clarify whether the 970 homes are in Uttlesford or in Uttlesford and Braintree combined.	970 dwellings are to be built by 2033 in Uttlesford District at the West of Braintree Garden Community. Amend the second bullet point in Paragraph 3.15 for clarity.	Amend the second sentence in the second bullet point in Paragraph 3.15 as follows: “The whole garden community, within both district, will comprise 10,000 new dwellings, of which a minimum of 970 homes will be built in Uttlesford district by 2033, ...”
<b>3.15</b>	Concern over the impact of the GC at Great Chesterford on the ground water supplies.	The North Uttlesford Garden Community is in Groundwater Protection Zone 3 but an identified impact can be mitigated. This will be considered in more detail in the Development Plan document for the Garden Community. The Water Cycle Study has not identified any show stoppers with regard water supply.	No change.

<p><b>3.15</b></p>	<p>Concern over the impact of the GC at Great Chesterford on flooding, as part of Hinxton are already flooding.</p>	<p>The majority of the North Uttlesford Garden Community site is in Flood Zone 1 although parts are in Flood Zones 2 and 3. The Garden Community will explore opportunities to manage flood risk to the benefit of the existing community. It is considered that the development will be able to demonstrate that there will no increased risk of flooding to existing properties. Further details will be provided in the Garden Community Development Plan document.</p> <p>Policy SP7 of the Draft Regulation 18 Plan already includes reference to flood risk management and the Garden Community will also have to meet the requirements of Policies EN11 and EN12 as well as the requirements of the Local Lead Flood Authority and the Environment Agency.</p>	<p>No change.</p>
<p><b>Map 1</b></p>	<p>Concern over the impact of Easton Park on Little Easton (heritage, rural character, urban sprawl, traffic)</p>	<p>Easton Park Garden Community will be required to comply with all the policies in the Local Plan including design, natural and historic environment, landscape and transport. It will also most notably be required to comply</p>	<p>No change.</p>

		with Policies SP5 and SP6 which set out specific requirements for the Garden Communities and Easton Park Garden Community. Further detail will be set out in the Easton Park Garden Community Development Plan document.	
<b>Map 1</b>	Site 03GtHal15 should be allocated in Bishops Stortford	See chapter 12.	No change.
<b>Map 1</b>	Size of West of Braintree on the map does not reflect its proximity to Stebbing or the size of the development	Map 1 is the Key Diagram for the Plan. It is a strategic map indicating the broad location of development. The Policies Map which accompanies the Local Plan provides detailed site maps to scale.	No change.
<b>Map 1</b>	Infrastructure to support the garden communities should be included on the map	The infrastructure to support the garden Communities will be included in the Development Plan documents prepared for each Garden Community.	No change.
<b>Map 1</b>	Concern over impact of West of Braintree on Boxted Wood	Policy SP8 requires the West of Braintree Garden Community to incorporate measures to protect and enhance Boxted Wood. Further detail will be set out in the West of Braintree Garden Community Development Plan document.	No change.



<b>Map 1</b>	Map 1 legend shows B roads in brown, but not all the B roads are shown. They should all be shown, or the Legend should be amended to Strategic B roads.	Paragraph 3.11 that accompanies Map 1 – Key Diagram states that it shows strategic road linkages. This should be reflected in the legend. Agree- amend map.	Amend the legend to Map 1 – Key diagram as follows:  “ <u>Strategic</u> B roads”
<b>Map 1</b>	The map shows Farnham as a Type B village, however Farnham is listed in the table of Type A villages in Table 3.2	Agree- amend map.	Amend Map 1 – Key diagram as follows:  Blue dot illustrating Felsted as a Type B village should be changed to a green dot to show it as a Type A village.

## Uttlesford District Council – Proposed Response

### Chapter 3: Spatial Strategy

#### Policy SP3 and associated Paragraphs

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
SP3	Development in Saffron Waldon and Great Dunmow will have a severe effect on the road network, suggesting that UDC should consider opportunities to link infrastructure to the airport and Easton Park.	The District Council is supportive of sustainable travel opportunities and is actively supporting a feasibility study of a link between West of Braintree, Easton Park and Stansted Airport. Policies SP5, SP6 and SP8 include reference to high quality, frequent and fast public transport links. Further details will be included in the Garden Communities Development Plan documents.	No change.
SP3	Upgrades may be needed to the sewerage treatment works at Bishop Stortford and Stansted Mountfitchet.	Noted. This is being considered as part of the Water Cycle Strategy update and will be reflected in the Infrastructure Delivery Plan and the Garden Community Development Plan documents.	No change.
SP3	It may be beneficial to allow some development in the Type A & B villages.	The Type A and Type B villages will provide almost 700 new dwellings over this plan period. In addition, the Plan acknowledges that these settlements are suitable for a scale of development that would reinforce	No change.

		<p>their role as service. An allowance of 1,190 dwellings has been included in the Plan for small unidentified windfall sites, some of which could come forward in the smaller villages. Neighbourhood plans could also identify sites in these smaller villages.</p>	
<p><b>SP3</b></p>	<p>Concerned over school provision to cope with the demand arising from new housing proposed in Uttlesford.</p>	<p>The Local Plan sets out specific policies to ensure the provision of infrastructure in the District overall but particularly the Garden Communities in the specific Garden Community policies and in Chapter 8 – Infrastructure of the Local Plan. This will be supported by the Infrastructure Delivery Plan which will be a “living” document – this means it will be regularly updated in consultation with infrastructure and service providers including Essex County Council in relation to schools.</p> <p>Policies SP6, SP7 and SP8 set out the number and size of primary and secondary schools to be provided at each Garden Community. The specific Garden Community Development Plan documents will provide more detail about the location, timing, cost and delivery of the schools.</p>	<p>No change.</p>

<p><b>SP3</b></p>	<p>Concern over urbanisation of the open countryside and loss of agricultural land</p>	<p>The National Planning Policy Framework requires local plans to meet the objectively assessed housing needs of an area unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. This means that the protection of the countryside and best and most versatile land must be weighed against meeting housing needs. The Local Plan has sought to achieve this balance by identifying sites to meet the District’s objectively assessed housing needs whilst setting out policies to minimise the impact on the countryside. In particular, Policy SP2 – The Spatial Strategy 2011-2033 of the Plan seeks to restrict development in accordance with Policy SP10 – Protection of the Countryside.</p> <p>In relation to the Garden Communities 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</p>	<p>No change.</p>
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		<p>(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 improvements.</p>	
<b>SP3</b>	Concerns over traffic congestion as a result of new development	<p>The Uttlesford Transport Study has considered the potential impact of development on the transport network and identified the mitigation measures required. This is reflected in the Infrastructure Delivery Plan that accompanies the Local Plan. The IDP will be a “living” document – this means it will be regularly updated in consultation with infrastructure and service providers including Essex County Council and Highways England in relation to transport matters.</p>	No change.

<b>SP3</b>	Concerns regarding the locations of the site allocations in proximity to ancient woodland.	<p>Consideration has been given to ancient woodland in the assessment of potential sites in the SLAA and the SA of the Local Plan.</p> <p>Policy SP8 – West of Braintree requires the Garden Community to incorporate measures to protect and enhance Boxted Wood. Further details will be set out in the Garden Community Development Plan document.</p>	No change.
<b>SP3, Para 3.35</b>	Concern regarding 5-year land supply as the Garden Communities will take longer to deliver than expected.	<p>The Plan makes provision for a range of other housing sites which will together with the Garden Communities ensure that the five year housing land supply is deliverable.</p> <p>Additional sites are allocated at: Debden, Felsted, Great Dunmow, Great Easton, Henham, Newport, Thaxted and Saffron Walden.</p>	The additional site allocations are set out in Chapter 12 – Residential Site Allocations and included in amended Policy SP3 – The Scale and Distribution of Housing Development.
<b>SP3</b>	Suggestion that the rate of delivery should be higher in the garden communities	The Council has reviewed the delivery rates of the Garden Communities and adjusted them to reflect a higher maximum build rate. This higher build rate was informed by a review of build rates elsewhere and the views of the promoters. However, as the Council has decided to produce DPDs, which add a greater degree of control but	Amend housing trajectory to reflect higher maximum build rates and a later start date.

		take longer to produce, the start date for completions on Easton Park and North Uttlesford have been pushed back a year.	
<b>SP3</b>	It is suggested that development should not take place in a number of villages: Elsenham, Takeley, Thaxted, Henham due to lack of services.	The settlement hierarchy and the distribution of development set out in the Draft Regulation 18 Plan has considered a range of factors. It is considered that is an appropriate range of services available in Elsenham, Takeley, Thaxted, Henham that reflect their relative places in the hierarchy.	No change.
<b>SP3</b>	Concern expressed that the MoU does not include Brentwood, which cannot meet its housing need	Brentwood is not in the West Essex and East Hertfordshire HMA. Brentwood has not requested that Uttlesford District accommodates any of its housing needs so this is not a matter for Uttlesford to consider as part of the preparation of this Local Plan. A Memorandum of Understanding is not required with Brentwood.	No change.
<b>Para. 3.25</b>	Provide a summary of the differences between the calculations underpinning the OAN for the whole market area from 54,608 to 51,700 explaining why a lower number has been arrived at	This detail is not required in the Local Plan itself. The evidence base should be read alongside the Plan. The differences are explained in the latest SHMA itself – the 2017 SHMA.	No change.
<b>Para. 3.25</b>	Section 3 of document ED112 indicates that an uplift of 20% might still be justified as a response to market signals, to align with future jobs. The figures supporting these issues do not seem to have changed, but a lower uplift is now proposed.	Document ED112 is the 2017 SHMA (the reference is the East Herts Local Plan Examination library reference). The SHMA explains the approach to an uplift.	No change.

<p><b>Para. 3.25</b></p>	<p>Concern that Epping Forest will struggle to plan for the necessary homes</p>	<p>Epping Forest has not requested that Uttlesford District accommodates any of its housing needs so this is not a matter for Uttlesford to consider as part of the preparation of this Local Plan. Epping Forest is meeting all of its objectively assessed housing need as set out in the Memorandum of Understanding in its recently Submitted Local Plan.</p>	<p>No change.</p>
<p><b>Para. 3.25</b></p>	<p>Concern over duty to cooperate with Cambridgeshire on NUGV in regard to visual impact, traffic, pollution, water supply, flooding and sewage</p>	<p>The Council has been in regular contact with Cambridgeshire County Council in the development of Uttlesford's Local Plan. The Council has engaged with Cambridgeshire County Council on an ongoing basis, including looking at the transport impact of the proposal on roads within Cambridgeshire.</p>	<p>No change.</p>
<p><b>Para. 3.25</b></p>	<p>Concern that the GLA 2016 household projections have not been examined in the Local Plan</p>	<p>The updated SHMA 2017 has included consideration of the GLA 2016 household projections</p>	<p>No change.</p>
<p><b>Para. 3.26</b></p>	<p>Concern that Duty to Cooperate has not been met with SCDC, especially in relation to NUGC.</p>	<p>The Council has been in regular contact with South Cambridgeshire Council in the development of Uttlesford's Local Plan. The Council has engaged with South Cambridgeshire Council on an ongoing basis, including looking at the transport impact of the proposal on roads within Cambridgeshire.</p>	<p>No change.</p>



<p><b>Para 3.27</b></p>	<p>Concern that EFDC and SCDC will not meet their housing needs. Authorities in the HMA should set out contingency measures to meet unmet need from other authorities.</p>	<p>Epping Forest has not requested that Uttlesford District accommodates any of its housing needs so this is not a matter for Uttlesford to consider as part of the preparation of this Local Plan. Epping Forest is meeting all of its objectively assessed housing need as set out in the Memorandum of Understanding in its recently Submitted Local Plan.</p> <p>South Cambridgeshire District Council is not in the West Essex and East Hertfordshire HMA. It has not requested that Uttlesford District accommodates any of its housing needs so this is not a matter for Uttlesford to consider as part of the preparation of this Local Plan.</p>	<p>No change.</p>
<p><b>Para 3.27</b></p>	<p>There is no mention of HCC as part of those authorities with whom the council has cooperated although reference has been made elsewhere in the draft Plan.</p>	<p>Paragraph 3.27 does not list all the local authorities or other organisations that the District Council has co-operated with in the preparation of the Local Plan. The Duty to Co-operate Compliance Statement that will accompany the submission of the Local Plan will set out details of all the co-operation with other local authorities and organisations that the Council has undertaken.</p>	<p>No change.</p>
<p><b>Para 3.27</b></p>	<p>UDC must work with BDC to deliver the garden community the</p>	<p>The District Council is working closely with Braintree District Council, North</p>	<p>No change.</p>

	straddles the UDC BDC boundary.	Essex Garden Communities and Essex County Council to jointly plan for and deliver the West of Braintree Garden Community.	
<b>Para 3.27</b>	Uttlesford is within the London Stansted Cambridge Corridor and this should be noted in the plan.	This is acknowledged in the Spatial Vision set out in Chapter 2 and in Paragraphs 3.27-3.34 of the Local Plan.	No change.
<b>Para 3.28</b>	Para. 3.28 could be expanded to include the local authorities in the West Essex -East Hertfordshire Housing Market Area	This paragraph refers to the London Stansted Cambridge Corridor rather than the West Essex East Hertfordshire HMA.	No change.
<b>Para 3.29</b>	Clarification sought on whether the new jobs will be for people moving into new housing	Paragraph 3.29 is simply describing the existing economic character of the London Stansted Cambridge Corridor. The new jobs planned in the Local Plan in Uttlesford will meet the needs of both the existing and growing population.	No change.
<b>Para 3.29</b>	Concern that development is taking place far away from Chesterford research park	North Uttlesford Garden Community is located in close proximity to Chesterford Research Park and the Wellcome Genome Campus. This is acknowledged in Policy SP7 – North Uttlesford Garden Community.	No change.
<b>Para 3.30</b>	“The Core Area” should be defined and included in the Glossary.	Agree. For clarity add the definition of the Core Area of the London Stansted Cambridge Corridor to the Glossary in Appendix 1 to the Plan.	Add the following definition of the Core Area of the London Stansted Cambridge Corridor to the Glossary in Appendix 1: <u>“The Core Area: The Core Area of the London Stansted Cambridge Corridor (LSCC) is made up the Councils of Broxbourne, East Herts, Epping</u>

			<u>Forest, Harlow and Uttlesford. This recognises the cross- boundary importance of the area in industry and business and the contribution of the area to UK economic growth.”</u>
<b>Para 3.31</b>	Any development supported through improvements in rail capacity linked to Crossrail 2 should be explicitly recognised in the Uttlesford Local Plan.	Crossrail 2 is an important consideration to any housing delivery in Uttlesford. The nearest Crossrail 2 station to Uttlesford is expected to be located in Broxbourne. It is important to maximise the opportunities that Crossrail 2 can deliver in Uttlesford.	No change.
<b>Para. 3.31</b>	Thought needs to be given to high speed broadband in new houses.	This is acknowledged in the Spatial Vision set out in Chapter 2 and in Policy INF4 – High Quality Communications Infrastructure and Superfast Broadband.	No change.
<b>Para. 3.31</b>	Clarity is sought in regard to the statement ‘the provision of new, alternative green spaces’. What green spaces will be lost?	This statement refers to having more choice in relation to access to green space.	No change.
<b>Para 3.31-3.33</b>	Suggestion that the vision for the LSCC should be presented in such a way to suggest that it is the agreed vision, i.e. a separate text box	This is not necessary.	No change.
<b>Para 3.31-3.34</b>	Suggestion of an integrated approach towards rail based public transport within Uttlesford and Cambridge	Opportunities are being explored to link the Garden Communities to the existing rail network.	No change.
<b>Para 3.31-3.33</b>	The GLA would like to liaise with the Council about the scale of the Garden Communities and infrastructure requirements they may depend on.	The District Council has invited the GLA to meet to discuss the Local Plan and their response.	No change.
<b>Para 3.31-3.33</b>	Network Rail would welcome the opportunity to engage with the LA in relation to rail and how this can provide a high quality public	The District Council has invited Network Rail to meet to discuss the Local Plan and how rail can provide	No change.

	transport link to garden communities.	high quality links to the garden communities.	
<b>Para 3.32</b>	This paragraph could also refer to the Harlow and Gilston Garden Town.	The paragraph already refers to Greater Harlow so no further reference is considered necessary to the Harlow and Gilston Garden Town.	No change.
<b>Para 3.37</b>	Suggestion that this paragraph could refer to the latest available joint evidence on FOHN published in July 2017 by ORS	Agree – update Paragraph 3.37 to refer to the 2017 SHMA.	Amend paragraph 3.37 as follows: “Strategic Housing Market Assessments (SHMAs), published in 2010, 2012 <del>and</del> , 2015 <u>and 2017</u> have been commissioned by the four authorities and undertaken for the combined area of East Hertfordshire, Epping Forest, Harlow and Uttlesford Districts. The <del>2015</del> <u>2017</u> SHMA gives an up to date and policy-compliant assessment of housing need over the Housing Market Area for the period 2011-2033.”
<b>Para 3.38</b>	Paragraph 3.38 makes reference to three draft MoUs that were actually signed in March 2017. Reference should be made to the MoU agreed in March 2017 for managing the impacts of growth within the West Essex and East Herts HMA on Epping Forest SAC.	Agree – amend Paragraph 3.38 to reflect the latest position on the MoUs.	Amend Paragraph 3.38 to read as follows: “A <del>Draft</del> Memorandum of Understanding (MoU) has been developed <u>and signed</u> by the four Councils, and supported by Essex County Council, Hertfordshire County Council and Highways England in respect of the Distribution of Objectively Assessed Need across the West Essex/ East Hertfordshire Housing Market Area. This forms part of the mechanism for delivering the LSCC

			<p>Vision. Further <del>Draft</del> MoUs have been <del>developed</del> <u>signed</u> by the four authorities, Essex County Council, Hertfordshire County Council and Highways England in relation to the provision of strategic highways and transport infrastructure to support the delivery of the strategic housing and economic needs of the wider area. <del>Further Draft</del> <u>In addition, a</u> <del>MOU's have</del> <u>has</u> been developed <u>and signed</u> with Natural England and the Conservators of Epping Forest to ensure that the Epping Forest Special Area of Conservation is monitored to ensure that the growth does not adversely affect air quality in the Forest. <u>The Council is also working on a MoU dealing with employment needs across the Functional Economic Market Area (FEMA)."</u></p>
<b>Para. 3.39 – 3.49</b>	Questioning robustness of the 2015 SHMA. Does not reflect the Planning Practice Guidance. Questioning the basis of the objectively assessed housing need.	The SHMA has been updated in 2017. It uses the most up to date data and is considered to be in accordance with the Planning Practice Guidance.	No change.
<b>Para. 3.39</b>	Concern that housing supply and need data is not up to date.	The latest available supply and need data has been used for the Local Plan. Annual housing monitoring is undertaken and published each year on the Council's website. The most up to date housing need data has been used for the latest SHMA in 2017.	No change.

<b>Para. 3.39</b>	Basildon Borough Council supports UDC’s strategic approach to growth but advises that unmet need may arise from the South Essex HMA. The currently drafted Local Plan does not include a review mechanism should such as request be made.	None of the South Essex HMA authorities have requested that Uttlesford District accommodates any of its housing needs so this is not a matter for Uttlesford to consider as part of the preparation of this Local Plan.	No change.
<b>Para. 3.43</b>	Contingency measures should be included in case one authority in the HMA is unable to meet its own needs.	None of the other authorities in the West Essex and East Hertfordshire HMA have requested that Uttlesford District accommodates any of their housing needs so this is not a matter for Uttlesford to consider as part of the preparation of this Local Plan.	No change.
<b>Para. 3.45</b>	Support for “backloading” the housing need to reflect the delivery of the Garden Communities later in the Plan and avoiding failure to meet the five year housing land supply.	<p>The Plan makes provision for a range of other housing sites which will together with the Garden Communities ensure that the five year housing land supply is deliverable.</p> <p>Additional sites are allocated at:          Debden, Felsted, Great Dunmow, Great Easton, Henham, Newport, Thaxted and Saffron Walden.</p>	The additional site allocations are set out in Chapter 12 – Residential Site Allocations and included in amended Policy SP3 – The Scale and Distribution of Housing Development.
<b>Para. 3.46/ 3.47</b>	Contrasting views the windfall allowance is too low whilst other views that the windfall allowance should be reduced in favour of allocating specific sites.	The windfall allowance is based on historical windfall rates and an estimate of the likelihood of these rates continuing in the future.	No change.
<b>Para. 3.47- 3.49, SP3</b>	The most up to date permissions should be included in the figures.	Agree – Tables 3.4 and 3.5 and Policy SP3 will be updated to reflect the latest supply position.	Amend Tables 3.4 and 3.5 and Policy SP3 to reflect the latest supply position.

<p><b>Para. 3.47-3.48</b></p>	<p>The delivery rates at the Garden Communities are over-optimistic. In addition, UDC does not currently have a five year housing land supply. Additional sites should be identified in the villages.</p>	<p>The Plan makes provision for a range of other housing sites which will together with the Garden Communities ensure that the five year housing land supply is deliverable.</p> <p>Additional sites are allocated at:          Debden, Felsted, Great Dunmow, Great Easton, Henham, Newport, Thaxted and Saffron Walden.</p>	<p>The additional site allocations are set out in Chapter 12 – Residential Site Allocations and included in amended Policy SP3 – The Scale and Distribution of Housing Development.</p>
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## Uttlesford District Council – Proposed Response

### Chapter 5: Employment

#### Policy SP4 Provision of Jobs

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
SP4	The policy is supported by our SHMA partners	Support Welcomed.	No Change
	Over reliance on a small number of allocations for employment land. A range of additional sites for employment development should be allocated.	<p>Disagree. The new employment sites allocated in the emerging plan in the new Garden Communities and at existing settlements bolsters the existing 48983.36sqm of smaller remaining allocated employment sites which have planning permission and will deliver a diverse range of commercial buildings to meet our employment needs over the plan period.</p> <p>The 49,000 sqm of smaller-scale employment sites in the district deliver a broad and diverse portfolio of deliverable employment sites in sustainable locations.</p>	No Change



	<p>Over reliance on Stansted Airport to deliver jobs</p>	<p>Disagree. Stansted Airport has been identified as the largest employer in the FEMA (Functional Economic Market Area) and is set to expand during the plan period. Therefore it is the most likely to deliver the higher proportion of jobs in the future.</p> <p>In order to provide a diverse range of employment throughout the district, the Council has allocated a number of sites. These include a 55ha Site at the Northern Ancillary Area (Now known as the North Stansted Employment Area) of Stansted Airport for non-Airport Related activity and 35,300sqm of employment space at Chesterford Research Park. In addition, the 49,000 sqm of smaller-scale employment sites in other parts of the district deliver a broad and diverse portfolio in sustainable locations.</p>	<p>No Change</p>
	<p>Employment statistics not accepted</p>	<p>Disagree. The West Essex and East Hertfordshire Assessment of Employment Needs 2017 amended evidence based statistics indicate that over the</p>	<p>Amend the following text:  “Provision will be made for a minimum net increase of <del>16,000</del> 14,630 jobs in the</p>

		<p>plan period that an additional 16,000 jobs will be created in Uttlesford District.</p> <p>This data was calculated using the baseline data from the East of England Forecasting Model (EEFM). This can be considered as reasonable and reliable as a source as it is by requirement in accordance with the NPPF and NPG.</p>	<p>period 2011-2033..."</p>
	<p>Concern that policy will not reduce out commuting.</p>	<p>Noted. The West Essex and East Hertfordshire Assessment of Employment Needs 2017 applies an adjustment to seek to balance the labour market and ensure that out commuting levels remain at 2011 levels, Which is 38.2% of workers out commuting from the FEMA area.</p> <p>The residents in the district have a choice of where to live and work and will continue to commute out of the district to and from their place of employment where necessary.</p>	<p>No Change</p>

## Uttlesford District Council – Proposed Response

### Chapter 3: Spatial Strategy

#### Policy SP5 and associated Paragraphs

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
SP5	Concerns relating to infrastructure provision.	Policy SP5 makes specific reference to the phasing, infrastructure and delivery of development in the Garden Communities. This will be set out in detail in the Development Plans that will be prepared for each Garden Community. In addition, Policy INF1 of the Local Plan sets out the overall approach towards infrastructure provision in Uttlesford.	No change.
SP5	Concerns related to traffic congestion. Rail links should be included in the design of each new GC.	The third paragraph of Policy SP5 makes specific reference to reducing the reliance on the private car and including other forms of transport: "Opportunities for smarter and sustainable travel will be maximised, with links to neighbouring settlements provided that reduce the	No change.

		<p>reliance on the private car.” Policies SP6, SP7 and SP8 all include reference to the provision of high quality, frequent and fast public transport links. The exact nature and details of the public transport links will be set out in Development Plans that will be prepared for each Garden Community.</p>	
<b>SP5</b>	<p>Employment land to provide local jobs and attract skilled workers to the area should form part of the plan for each GC settlement.</p>	<p>Policies SP6, SP7 and SP8 all include reference to delivery of a range of local employment opportunities. This is in addition to the provision of new local centres at each Garden Community which will provide a mix of retail, business and community uses with their own job opportunities. Policy SP7 – North Uttlesford Garden Community highlights that economic links will be maximised with the Wellcome Genome Campus and Chesterford Research Park. A specific economic development strategy will be developed for each Garden Community and this will inform the Development Plans that will be prepared for each Garden</p>	<p>No change.</p>

		Community.	
<b>SP5</b>	Reference should be made to the need for the inclusion of public open space and green infrastructure.	<p>This proposed change is not required. The fifth paragraph of Policy SP5 states: “The delivery of physical, social and green infrastructure, and the trigger points for these, will form part of the phasing and delivery plan.”</p> <p>Policies SP7, SP8 and SP9 include reference to open space and other types of green space as well as key elements of the green infrastructure network.</p> <p>Policy D4 requires the preparation of a green infrastructure plan for all strategic development proposals including the garden communities.</p> <p>Further detail will be set out in the Development Plans prepared for each Garden Community.</p>	No change.
<b>SP5</b>	Assuming the DPDs are prepared by the developer, what is the scrutiny and revision process prior to adoption	The Development Plan Documents will be prepared by the District Council and will be subject to public consultation and public examination by an	No change.

		independent Planning Inspector.	
<b>SP5</b>	SP5 should refer to the need for early or timely delivery of infrastructure to encourage the policy requirement of high levels of self-containment from the outset.	The principle of timely delivery and how it will be met is already set out in Policy INF1 of the Local Plan. Policy SP5 specifically requires the preparation of phasing, infrastructure and delivery plans for each garden community as part of their individual Development Plans. The phasing, infrastructure and delivery plans will set out the order of development and the trigger points for delivery of infrastructure in relation to the development. This will ensure timely delivery. Early delivery will not necessarily be justified or viable. If it is appropriate this will be reflected in the phasing, infrastructure and delivery plan.	No change.
<b>SP5</b>	The third paragraph of the policy should include the word 'landscape'	This change is not required.  Policy D1 of the Local Plan requires development proposals to demonstrate how they respond to the landscape, local and longer views, the environment and historic assets.  Policy C1 sets out the approach	No change.

		to the protection of landscape character.	
<b>SP5</b>	Development frameworks should be prepared in consultation with stakeholders. It is unclear whether developers or residents will prepare the development frameworks.	The Development Plan Documents will be prepared by the District Council and will be subject to public consultation and public examination by an independent Planning Inspector.	No change.
<b>SP5</b>	Land value capture is mentioned in the supporting text but not within the policy, however this is an essential element of delivering Garden City principles.	The principle of land value capture underpins the approach set out in Policy SP5 of the Local Plan. Policy SP5 makes clear that the developments must demonstrate how they accord with the garden city principles defined by the TCPA. These principles include land value capture. The type of delivery for the Garden Communities is yet to be determined. A range of options are possible including delivery led entirely by the private sector such as major developers through to a partnership approach between the public and private sectors or a more public sector led approach such as development corporations.	No change.

<p><b>SP5</b></p>	<p>Objection to Garden Community development frameworks as SPDs.</p>	<p>It is now the Council’s intention to prepare Development Plan Documents rather than Supplementary Planning Documents as they will carry greater weight in planning application decision-making.</p> <p>The Development Plan Documents will be prepared by the District Council and will be subject to public consultation and public examination by an independent Planning Inspector.</p>	<p>No change.</p>
<p><b>SP5</b></p>	<p>The LP should contain a framework to guide how the boundaries and extent of the garden communities are determined.</p>	<p>Agree. Insert a new Paragraph 3.58 setting out the framework to be used to determine the boundaries and extent of the garden communities in the preparation of the Garden Community Development Plan documents.</p>	<p>Insert new Paragraphs 3.58 – 3.60 as follows:</p> <p>“Development Plan Documents will be prepared for each Garden Community. Part of the role of Garden Community Development Plan documents is to determine the full extent of land required for each Garden Community. In order to determine the full extent of the land required it is necessary to consider the nature of the existing area and the level of land uses and infrastructure required</p>



			<p>to serve the Garden Community.</p> <p>Options for the extent of the boundary will be considered as part of the preparation of the Garden Community DPDs but will include:</p> <ul style="list-style-type: none"><li>- Identification of clear and defensible boundaries (watercourses, roads, woodland belts);</li><li>- Appreciation of distance and separation of communities (physical, visual and perceived):</li><li>- Relationship to existing settlements;</li><li>- Nature of land that will perform the role of a 'green buffer' which will define an envelope within which a new community can be accommodated</li></ul>
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			<p>and that remains distinct from other existing settlements; and</p> <ul style="list-style-type: none"><li>- Planning policy protection (how might this land be protected 'in perpetuity' from built development whilst allowing complementary activities that support both the new community and existing communities?).</li></ul> <p>The effects of constraints on potential land use will be identified through consideration of the evidence base and by engagement with landowners, statutory agencies, utility service providers and others. Based on this process, absolute constraints on development, such as easements and buffers to existing settlements can be defined and removed from the boundary of the</p>
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			Garden Community altogether or from the developable area if they remain within the boundary. Remaining constraints, such as areas of high landscape sensitivity will influence decisions on proposed land uses and potential residential densities.”
<b>SP5</b>	More comprehensive HIAs should be undertaken.	Comprehensive Health Impact Assessments will be prepared for the Garden Community Development Plan documents. This is a requirement of Policy INF3 – Health Impact Assessments of the Local Plan.	No change.
<b>SP5</b>	When projecting health care need, the NHS now work on square metres of space and not the traditional population per head General Practitioner model.	This is a detailed matter that will be reflected in the Development Plan documents for each Garden Community and the Infrastructure Delivery Plan.	No change.
<b>SP5</b>	UDC should adopt the multi-functional specialised hub models as the preferred model of health infrastructure delivery.	This is a detailed matter that will be reflected in the Development Plan documents for each Garden Community and the Infrastructure Delivery Plan.	No change.
<b>SP5</b>	The overarching policy setting out the garden communities principles should include reference to sustainable drainage. Suggested wording: “Provision, management and on-going maintenance of sustainable surface water drainage measures will be included to manage and mitigate the risk of	This proposed change is not required. Policy EN12 sets out the approach to surface water flooding and drainage.	No change.

	flooding on site and which will reduce the risk of flooding to areas downstream or upstream of the development.”		
<b>SP5</b>	SP5 should include reference to water efficiency. Suggested wording: <i>“Water efficiency – in order to promote water efficiency in new residential developments in the Garden Communities, the optional Building Regulation water efficiency standard of 110 litres per occupier per day will be applied. Non-residential development should adopt BREEAM or similar standard for the application of water efficiency components and water recycling.”</i>	This proposed change is not required. Policy EN13 already refers to the water efficiency standard of 110 litres per person per day. Policy D8 refers to BREEAM for water efficiency and reuse.	No change.
<b>Para. 3.55</b>	Recommendation that the following wording be inserted as additional supporting text after paragraph 3.55: “Measures to promote environmental sustainability should address the provision of appropriate wastewater and flood mitigation measures, including use of open space for sustainable drainage systems.”	This proposed change is not required. Policies EN11 – EN13 set out the approach to flood risk and mitigation. Paragraphs 10.38 – 10.39 provide information about sustainable drainage systems. Any proposals for sustainable drainage systems will be subject to compliance with local/ national standards. The specific use of open space for sustainable drainage systems will depend upon a number of factors and is considered to be too detailed for specific reference in the Local Plan.	No change.
<b>Para. 3.55</b>	Clarification on the term ‘community land value capture’ and what this means/results in.	The principle of land value capture underpins the approach set out in Policy SP5 of the Local Plan. The type of delivery for the Garden Communities is yet to be determined. A range of options are possible including delivery led entirely by the	No change.

		private sector such as major developers through to a partnership approach between the public and private sectors or a more public sector led approach such as development corporations.	
<b>Para. 3.57</b>	As the timeframe for implementing development is contested there should be more smaller sites included to provide shorter term housing provision and retain 5YHLS.	The Plan makes provision for a range of other housing sites which will together with the Garden Communities ensure that the annual housing requirements is met and the five year housing land supply deliverable. Additional sites are allocated to ensure a five year land supply.	The additional site allocations are set out in Chapter 12 – Residential Site Allocations and included in amended Policy SP3 – The Scale and Distribution of Housing Development.
<b>Para. 3.57</b>	The timescale of the plan is unrealistic. SPDs will take longer than expected to adopt, which will affect the delivery timescales.	<p>It is now the Council’s intention to prepare Development Plan Documents rather than Supplementary Planning Documents as they will carry greater weight in planning application decision-making.</p> <p>The Development Plan Documents will be prepared by the District Council and will be subject to public consultation and public examination by an independent Planning Inspector. Progress can be made relatively</p>	No change.

		<p>quickly and the timescales of the plan are considered to be consistent with the time required to prepare Development Plan documents.</p> <p>Following the decision to prepare DPDs, the Council has amended the proposed housing trajectory for NUGC and Easton Park, pushing back the commencement of development by a year to reflect the likely commencement of development.</p>	
<b>Para 3.58</b>	No evidence has been produced in relation to housing need beyond 2033	<p>It is clear from national long-term projections that population growth and increasing housing need is expected to continue in England. There is no reason to believe that population growth and housing need will not also continue in Uttlesford beyond 2033. The amount of need and timing will be considered as part of the preparation of future Local Plans.</p>	No change.

## Uttlesford District Council – Proposed Response

### Chapter 3 Spatial Strategy

Added text – shown underlined

Deleted text – shown crossed out or struck through

#### Easton Park Garden Community Policy SP6 and associated paragraph 3.59

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
SP6	Concern expressed about water infrastructure being in place in a timely manner and the need for more a more detailed Water Cycle Study.	The Council acknowledges the need for a more detailed Water Cycle Study, the Council has commissioned such a study. For Easton Park the Water Cycle Study Phase 2 found no showstoppers preventing timely delivery of at least one feasible technical solution for this Garden Community by upgrading the impacted WRC infrastructure. Further detailed work will be done for the Thames Area to determine the most appropriate solution for Easton Park	No change.
SP6	Concern expressed about how this proposal will impact on heritage assets in and surrounding the site.	<p>The Council acknowledges the heritage assets on and nearby to the site, and the recommendation in the Brief Heritage Impact Assessment to undertake more detailed work. The Council has commissioned an Archaeology Report and Full Heritage Impact Assessment that has been used to inform the regulation 19 draft Local Plan.</p> <p>For Easton Park the Archaeology work reviews the heritage assets within and immediately adjacent to the proposed site. The study identifies a number of proposals to enhance the</p>	Amend the text in the policy to reflect the findings of the evidence base.

		<p>heritage assets and mitigation measures to deal with potential harm. Reference to this report and these measures is proposed to be included within the policy, so that subsequent masterplanning work takes these recommendations into account.</p> <p>The Full Heritage Impact Assessment concludes that development of the Easton Park site has the potential to harm the significance of heritage assets on the site and surrounding the site. There is also evidence of buried archaeology on the site and in the wider area. These include cropmarks at Perryfield Ponds, medieval settlement at Phillipland Wood, Roman Rural settlement and cemetery at Strood Hall within the site. The policy for Easton Park includes appropriate wording to mitigate landscape and heritage impacts.</p>	
SP6	<p>Concern expressed about how this proposal will interact with Stansted Airport, particularly in terms of noise impacts on the new community. Also, there is concern about how this proposal does not address the government's forthcoming aviation strategy</p>	<p>The Council has considered the noise impacts of aircraft taking off and landing at Stansted Airport on the proposed Garden Community at Easton Park. The assessment of this site identifies that the site is beyond the 54 LEQ aircraft noise contour at night and during the day. Masterplanning of the site in the subsequent DPD will be informed by, and seek to mitigate noise impacts on the proposal.</p> <p>In July 2017 the government issued a call for evidence on a new strategy, with the aim of creating a new aviation strategy looking towards 2050 and beyond. This call for evidence did not suggest anything about the content of the new</p>	<p>Add the following text:</p> <p><u>Provide acceptable mitigation of environmental and health impacts (including noise) from Stansted Airport. Masterplanning of the site will consider noise as a factor that will inform the development and buildings impacted by noise will be designed in such a way as to mitigate these impacts.</u></p>



		<p>aviation strategy and it is therefore difficult for Uttlesford District Council to take into account a strategy that does not yet exist. Nevertheless, the Council has engaged with Manchester Airports Group (the owners of Stansted Airport) to explore these issues. If the government's aviation strategy indicated the need for a second runway at Stansted Airport, Easton Park could be accommodated outside the relevant noise contours, subject to detailed consideration in the masterplan.</p>	
SP6	<p>Concern expressed about joint working on transport issues, particularly how impacts on the A120 and M11 junction 8 are managed and how the proposals links into public transport.</p>	<p>The Council acknowledges the transport challenges surrounding development at Easton Park. UDC attends and feeds into regular duty to cooperate meetings with partners across the SHMA / FEMA area. These meetings include representatives from East Hertfordshire DC, Epping Forest DC, Essex CC, Harlow CC, Hertfordshire CC and Uttlesford DC, and meet at an officer and member level.</p> <p>Easton Park will feed traffic onto the A120 and contribute to congestion problems associated with this transport corridor. The Transport Study indicates that the three Garden Communities in the Local Plan (including Easton Park) are the preferable locations in transport terms. The study does identify impacts on the A120 from the Local Plan growth, including Easton Park. However, these impacts are within a level the highway authorities have confirmed they are content with.</p>	<p>No change.</p>
SP6	<p>Concern expressed about a single access into the</p>	<p>The policy requires the main vehicular access to</p>	<p>Amend the following text:</p>

	development.	be from the A120, and for the development to help fund improvements to the A120 and M11 j8, as well as enhancements to the local highway network. The policy does not limit the number of vehicular accesses to the site to only one, and further masterplanning work within the DPD will examine this issue further. Nevertheless, given the significant size of the Garden Community the access should be a dual-carriageway to ensure that there is safe access to the settlement. Future planning applications will be accompanied by a transport assessment that will demonstrate whether the highway impacts are acceptable.	“Provide the main vehicular access, <u>as a dual-carriageway</u> , from the A120, including improvements to the A120 and M11 Junction 8...”
SP6	Concern expressed about coalescence with Great Dunmow, Little Easton and Broxted and the creation of urban sprawl.	Easton Park will be a new Garden Community separate from Little Easton and Great Dunmow. The policy should be amended to make this clear.	Add the following text:  <u>Protect the separate identity of the nearby communities of Great Dunmow, Little Easton and Broxted as communities close to but separate from Easton Park. The nature of the transition between Easton Park and the nearby communities will be an important element of the design of the new Garden Community and the development will provide a strategic landscaped buffer.</u>
SP6	Concern expressed about the impact of Easton Park residents in the early phases using existing facilities in Great Dunmow.	Easton Park will be developed in line with the Garden Community Principles set out by the TCPA, and in policy SP5. These principles include the a wide range of local jobs in the Garden Community within easy commuting distance of homes and strong cultural, recreational and shopping facilities in walkable, vibrant, sociable	Amend the following text:  Permission will be granted for a new garden community at Easton Park following approval of a detailed development framework. The new garden community at Easton Park will

		<p>neighbourhoods.</p> <p>Policy INF1 sets out that “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 development. This is particularly important for the garden communities.”</p> <p>Policy SP6 sets out that the requirement for local employment opportunities and a mix of retail, business and community uses to be provided in local centres. Getting these uses in at the right time to minimise pressure on nearby communities is important. The masterplan in the form of a development framework DPD will set out the appropriate timing for the delivery of infrastructure and other uses. Reference to the masterplan should be added to the policy.</p>	<p><u>be developed in accordance with the development plan document and will:</u></p>
SP6	<p>Concern expressed about large numbers of residents commuting to jobs elsewhere (e.g. Cambridge or London).</p>	<p>Easton Park will be developed in line with the Garden Community Principles set out by the TCPA, and in policy SP5. These principles include the a wide range of local jobs in the Garden Community within easy commuting distance of homes and strong cultural, recreational and shopping facilities in walkable, vibrant, sociable neighbourhoods.</p> <p>The policy sets out that the requirement for local employment opportunities and a mix of retail, business and community uses to be provided in local centres.</p>	<p>No change.</p>

		The provision of jobs onsite will reduce the number of commuting based trips to destinations outside Easton Park.	
SP6	Concern expressed about the landscape impacts of the Easton Park.	The Landscape and Visual Appraisal for Land at Easton Park provides a high-level appraisal of the development potential of the site in landscape and visual capacity terms. The study assesses and highlights the landscape sensitivities / constraints and opportunities for potential development of Easton Park. These constraints and opportunities will be incorporated into the policy text.	Amend the text in the policy to reflect the findings of the evidence base.
SP6	Concerns expressed about evidence of lack of demand for new housing in Great Dunmow.	The Garden Community of Easton Park is not within Great Dunmow. Evidence of slower than expected housing delivery on sites in Great Dunmow does not necessarily mean that there will be no demand for homes at Easton Park	No change.
SP6	Concerns expressed about the relative benefits of alternative sites and the fact that sites in this area have been previously considered and rejected for development	<p>Previous considerations of development proposals in this area have been in a different planning context. As the government's recent consultation, the right homes in the right places, makes clear the government considers that there is a housing crisis in the south east of the country. This is the latest in a series of documents that sets out the problems with the housing market that have built up over a number of years and means that people spend more on housing costs (and hence less on other things) and those not on the housing ladder, find it increasingly difficult to buy their first home.</p> <p>The growth requirements that Uttlesford is</p>	No change.

		<p>planning for is a step change from previous levels of development. This has made the Council re-evaluate sites that have previously been considered and rejected for development.</p> <p>The Council has undertaken a comprehensive review of sites that are available, suitable and achievable for development within the plan period. Looking at small scale and larger scale sites that might be appropriate to meet the housing needs of the district.</p> <p>It is not surprising that the review failed to identify sufficient small scale sites within or on the edge of existing towns and villages within the district. Over the past 10 to 20 years there has been substantial development in and on the edge of the existing settlements, and most of the sites that could be developed have already been built on or identified.</p> <p>Looking for larger scale sites within the district, Uttlesford took the decision to look at developing Garden Communities. In order for a new settlement to be a Garden Community it should be as self-contained as possible, so it should provide jobs so people have the opportunity to work nearby to where they live. It should also be larger enough to sustain a secondary school and one or more local centres with shops and community facilities. In looking for such larger sites, the Council reached a short list of seven sites. Three of which are proposed for allocation</p>	
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		(including Easton Park), these three sites have the best potential to deliver sustainable, new Garden Communities. The four rejected sites failed for a variety of reasons including, not being large enough to support a secondary school and therefore be self-contained	
SP6	Concerns expressed about the loss of high quality agricultural land	Much of the agricultural land in Uttlesford is grade 2, including the land at Easton Park. The Council has undertaken a comprehensive review of sites that are available, suitable and achievable for development within the plan period. This review has not identified enough sites to meet the housing needs of the district on sites that are on brownfield land or lower quality agricultural land.	No change.
SP6	Concern expressed about the lack of existing infrastructure and problems in funding and delivering new infrastructure. Further concerns expressed about the remoteness of the site from existing infrastructure and jobs.	<p>Policy INF1 sets out that “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 development. This is particularly important for the garden communities.”</p> <p>Easton Park will provide infrastructure to mitigate the impacts of the new development. This will include contributing to improvements to the A120 and the M11 junction 8. Furthermore, Easton Park will provide a new secondary school, community facilities, health facilities and shops. Easton Park will also provide jobs to ensure it is as self-contained as possible.</p>	No change.
SP6	Concern expressed that negotiations may delay the start of development and that the Council will be	The site promoters are aware of Uttlesford District Council’s requirements regarding the	No change.

	<p>unable to negotiate effectively and deliver land value capture to benefit the community</p>	<p>Garden Community principles and assure the Council that they are able to meet these principles. The Council will ensure that the site promoters are kept to their word and the Development Plan Document for Easton Park, that follows the Local Plan, will write into policy specific requirements for the development. The Local Plan policy will set out the principles that will guide the development framework DPD and the development. Any planning application will be determined in accordance with the Local Plan and DPD and refused if it is not in accordance with these plans.</p> <p>The Council is employing a professional negotiating team to handle the negotiations with the site promoters. These negotiations are built into the timetable for the development. We cannot prejudge the outcome of those negotiations, however the Council is committed to delivering land value capture to benefit the community.</p>	
SP6	<p>Concerns expressed about the economic considerations of the proposed development</p>	<p>The Council has recently published a Corporate Economic Strategy, this commits Uttlesford District Council to producing Economic Strategies for the three proposed Garden Communities. The Corporate Economic Strategy will:</p> <ul style="list-style-type: none"> <li>- Support the expansion and promotion of key sectors in the local economy. Initially this will be life sciences, research and innovation; the rural economy; and the visitor economy which includes the town centres;</li> </ul>	<p>Add the following text:</p> <p><u>Have regard to the Uttlesford Economic Development Strategy for Easton Park.</u></p>

		<ul style="list-style-type: none"> <li>- Maximise the local and regional opportunities that arise from the London Stansted Airport location;</li> <li>- Establishing local economic strategies for each of the three proposed new garden communities in the district; and</li> <li>- Support the delivery and exploitation of high levels of connectivity including superfast broadband.</li> </ul> <p>Given the importance of the local economic strategies for the proposed garden communities to the development of economic land uses at Easton Park, the policy should include reference to it.</p>	
SP6	The Sustainability Appraisal considers that the policy should include reference to the presence of Local Wildlife Sites and SSSIs in the area.	The policy should be amended to make reference to the Local Wildlife Sites and SSSIs in the area.	<p>Add the following text:</p> <p><u>Have no adverse impact on the existing Local Wildlife Sites and SSSIs within and close to the site, with enhancements sought where possible to enhance wider green infrastructure and networks.</u></p>
	The Sustainability Appraisal highlights uncertain impacts regarding landscape, where the location has a (partly) relatively high sensitivity to change / development and this is not addressed in the Policy as a criterion related to Garden City principles.	The Landscape and Visual Appraisal for Land at Easton Park provides a high-level appraisal of the development potential of the site in landscape and visual capacity terms. The study assesses and highlights the landscape sensitivities / constraints and opportunities for potential development of Easton Park. These constraints and opportunities will be incorporated into the policy text.	Amend the text in the policy to reflect the findings of the evidence base.



## Uttlesford District Council – Proposed Response

### Chapter 3: Spatial Strategy – Policy SP7 and associated paragraphs

#### Policy SP7 and associated paragraphs

Ref	Key Issue / Comment	Council's Response	Change to the Plan
SP7	NUGC too large.	A Garden Community of a sufficient size is required in order to demonstrate high levels of self-containment. Smaller communities would increase pressure on existing facilities and increase the likelihood of commuting for work.	No change.
SP7 3.60 3.61	Pressure on infrastructure and lack of cycling facilities.	<p>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.</p> <p>Bullet point 4 of Policy SP7 requires that a network of safe walking and cycling facilities will be provided, including cycle routes connecting with the employment parks at the Wellcome Genome Campus and Chesterford Research Park.</p>	No change.

Ref	Key Issue / Comment	Council's Response	Change to the Plan
SP7	Housing affordability	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 everyone. The Development Plan Documents for each of 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.	No change.
SP7	Concerns over employment provision	The second bullet point of Policy SP7 includes reference to delivery of a range of local employment opportunities with a particular focus on maximising economic links to the Wellcome Genome Campus and Chesterford Research Park. This is in addition to the provision of a new local centre at the Garden	No change.

Ref	Key Issue / Comment	Council's Response	Change to the Plan
		Community which will provide a mix of retail, business and community uses with their own job opportunities. A specific economic development strategy will be developed for each Garden Community and this will inform the Development Plans that will be prepared for each Garden Community.	
<b>SP7</b>	Flood risk	Policies EN11 – EN13 set out the approach to flood risk and mitigation. The eighth bullet point of Policy SP7 specifically requires the North Uttlesford Garden Community to provide Sustainable Urban Drainage systems to provide water quality, amenity and ecological benefits as well as flood risk management. The Development Plan document for North Uttlesford garden Community will set out more detail about the nature of the flood risk management and mitigation measures including the location and phasing.	No change.
<b>SP7 3.60 3.61</b>	Negative impact on existing landscape, wildlife, local rural character and heritage (particularly the Romano-Celtic Temple).	The 11 <sup>th</sup> bullet point of Policy SP7 acknowledges the special historic and landscape setting of NUGC and sets out measures to	No change.

Ref	Key Issue / Comment	Council's Response	Change to the Plan
		mitigate the impact of the Garden Community.	
<b>SP7</b>	Impact on the water supply capacity	Policy EN13 sets out the approach to protection of water resources. The Development Plan document for North Uttlesford garden Community will set out more detail.	No change.
<b>SP7</b>	Loss of agricultural land	Much of the agricultural land in Uttlesford is grade 2. The land at NUGC is grade 2 and grade 3. The Council has undertaken a comprehensive review of sites that are available, suitable and achievable for development within the plan period. This review has not identified enough sites to meet the housing needs of the district on sites that are on brownfield land or lower quality agricultural land.	No change.
<b>SP7</b>	Limited information currently available about the Garden Communities.	Development Plan Documents will be prepared by the District Council for each Garden Community and will be subject to public consultation and public examination by an independent Planning Inspector. The Development Plan documents will provide more detail about each Garden Community. The	No change.

Ref	Key Issue / Comment	Council's Response	Change to the Plan
		Local Plan sets out the strategic principles for the more detailed DPDs.	
<b>SP7</b>	Insufficient consultation period	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.
<b>SP7</b>	Concerns over compliance with Duty to Cooperate with South Cambs.	The Council has been in regular contact with South Cambs in the development of Uttlesford's Local Plan. The Council has engaged with South Cambs on an ongoing basis, including looking at the transport impact of the proposal on roads within Cambridgeshire.	No change.
<b>3.60, 3.61</b>	Concerns about the timing of development bearing in mind the lead-in time required to prepare technical evidence and the provision of infrastructure.	Development Plan Documents will be prepared by the District Council for each Garden Community and will be subject to public consultation and public examination by an independent Planning Inspector. Progress can	No change.

Ref	Key Issue / Comment	Council's Response	Change to the Plan
		be made relatively quickly and the timescales of the plan are considered to be consistent with the time required to prepare Development Plan documents.	

## Uttlesford District Council – Proposed Response

### Chapter 3: Spatial Strategy – Policy SP8

#### Policy SP8

Ref	Key Issue / Comment	Council's Response	Change to the Plan
SP8	Concern regarding sports provision	<p>Policy INF2 sets out the approach to the protection and provision of open space, sports facilities and playing pitches. Bullet point 9 of Policy SP8 requires the provision of open space, play, leisure and recreation in line with the standards set out in the Local Plan.</p> <p>The Development Plan document for West of Braintree garden community will set out more detail about open space and sports provision.</p>	No change.
SP8, Para 3.62	Concern over inadequate transport infrastructure	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.
SP8	Concern over the impact on wildlife and ancient woodland	Policies EN8 – EN10 set out the approach to biodiversity and	No change.

Ref	Key Issue / Comment	Council's Response	Change to the Plan
		<p>trees. Bullet point 10 of Policy SP8 refers to the provision of natural, semi-natural and amenity green space in accordance with standards established in the Local Plan. Bullet point 11 requires the incorporation of measures in the Garden Community to protect and enhance Boxted Wood. The Development Plan document for West of Braintree garden community will set out more detail about measures to protect and enhance the natural environment including wildlife and ancient woodland.</p>	
<b>SP8</b>	Constraints in existing education and health facilities.	<p>Policy INF1 sets out that "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 development. This is particularly important for the garden communities."</p> <p>West of Braintree will provide infrastructure to mitigate the impact of the new development</p>	No change.



Ref	Key Issue / Comment	Council's Response	Change to the Plan
		<p>including eight primary schools and one large or two smaller secondary schools. This is set out in bullet point 3 of Policy SP8.</p>	
<b>SP8</b>	<p>Remoteness from existing employment facilities will result in an increase in car usage</p>	<p>Garden communities will provide a range of employment opportunities. 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.</p> <p>Bullet point 4 of Policy SP8 requires that high quality, frequent and fast public transport services be provided to Braintree, and a network of safe walking and cycling routes, including connections with and improvements to the Flich Way.</p> <p>This is in addition to the provision of a new local centre at the Garden Community which will provide a mix of retail, business and community uses with their own job opportunities. A specific</p>	<p>No change.</p>

Ref	Key Issue / Comment	Council's Response	Change to the Plan
		<p>economic development strategy will be developed for each Garden Community and this will inform the Development Plans that will be prepared for each Garden Community.</p>	
<b>SP8</b>	Concerns over flood risk	<p>Policies EN11 – EN13 set out the approach to flood risk and mitigation. The eighth bullet point of Policy SP8 specifically requires the West of Braintree Garden Community to provide Sustainable Urban Drainage systems to provide water quality, amenity and ecological benefits as well as flood risk management. The Development Plan document for West of Braintree garden Community will set out more detail about the nature of the flood risk management and mitigation measures including the location and phasing.</p>	No change.
<b>SP8</b>	Loss of high quality agricultural land	<p>Much of the agricultural land in Uttlesford is grade 2. The land at West of Braintree is grades 2 and 3. The Council has undertaken a comprehensive review of sites that are available, suitable and</p>	No change.

Ref	Key Issue / Comment	Council's Response	Change to the Plan
		achievable for development within the plan period. This review has not identified enough sites to meet the housing needs of the district on sites that are on brownfield land or lower quality agricultural land.	
SP8	Reference to youth centres should be amended to youth facilities. Reference should be made to community hubs.	Agree- amend text	Amend the last sentence of the text in bullet point 3 of Policy SP8 as follows:  "Early years and childcare facilities, health care facilities, community <u>hubs</u> and youth centres <u>facilities</u> will also be provided."
SP8	UDC should use the word 'landscape buffer' to be consistent with the garden communities proposed at Colchester, Tendering and Braintree. Suggested wording: <i>"Ensure that high quality landscape buffer zones around the new settlements are both protected and created, and that within these areas the landscape (and land uses?) Is/are enhanced and positively managed"</i> .	Policy SP8 and the supporting text will be amended to include specific reference to the recommendations of the Landscape and Visual Appraisal for Land at West of Braintree. This includes reference to: a strategic landscaped buffer between the Garden Community and Stebbing Green; tree screening to the east; a buffer zone on the south west side; and buffer zones in sensitive areas.	Include the recommendations from the Landscape and Visual Appraisal for Land at West of Braintree in the supporting text to Policy SP8. Incorporate the key elements from the Study's recommendations in Policy SP8.

Ref	Key Issue / Comment	Council's Response	Change to the Plan
SP8	Reference should be made to 'safe walking and cycling routes throughout the development and to and between local centres and schools etc'	<p>This is proposed change is not necessary.</p> <p>Bullet point four of Policy SP8 already includes reference to the provision of "a network of safe walking and cycling routes". This will include links to and between local centres and schools.</p>	No change.
SP8	Impact on historic buildings and assets	<p>The Council acknowledges the heritage assets on and nearby to the site, and the recommendation in the Brief Heritage Impact Assessment to undertake more detailed work. The Council has commissioned an Archaeology Report and Full Heritage Impact Assessment that has been used to inform the regulation 19 draft Local Plan.</p> <p>For West of Braintree the Archaeology work reviews the heritage assets within and immediately adjacent to the proposed site. The study identifies a number of proposals to enhance the heritage assets and mitigation measures to deal with potential harm. Reference</p>	<p>Include the recommendations from the Full Heritage Impact Assessment for West of Braintree in the supporting text to Policy SP8. Incorporate the key elements from the Study's recommendations in Policy SP8.</p>

Ref	Key Issue / Comment	Council's Response	Change to the Plan
		to this report and these measures is proposed to be included within the policy, so that subsequent masterplanning work takes these recommendations into account.	
SP8	Phasing should be included	The phasing, infrastructure and delivery of development in the Garden Communities will be set out in detail in the Development Plans that will be prepared for each Garden Community.	No change.
SP8	Item 7 should be reworded to ensure that any enhancements to or new water recycling facilities should be in place before the development takes place	This is a detailed matter that will be determined through the updated Water Cycle Study and will be reflected in the Development Plan that will be prepared for each Garden Community.	No change.
SP8	The policy should be strengthened to encourage working with HE, ECC and other stakeholders	UDC are committed to working with partner organisations and stakeholders in all aspects of delivering the Plan. This is noted in Paragraph 3.27 of the Local Plan.	No change.
SP8	The policy provides much less detail than BDC's policy regarding West of Braintree.	The Regulation 18 Draft Plan is at an earlier stage to the Braintree Local Plan which is a Submission Plan. The Regulation 19 Plan and the Development Plan that will be	No change.

Ref	Key Issue / Comment	Council's Response	Change to the Plan
		specifically prepared for the West of Braintree Garden Community will provide more detail.	
SP8	Need for a detailed Water Cycle Study	The Water Cycle Study was published in January 2017. It will be updated to inform the Submission Local Plan.	No change.
SP8	Need for a Minerals Resource Assessment	Discussions have been held with Essex County Council's Minerals Planning team who have confirmed that a Minerals Resource Assessment is required. The site promoters have prepared a Minerals Resource Assessment and this is subject to agreement with Essex CC.	No change.
SP8	It is recommended that the Policy is expanded to include requirements for a Heritage Impact Assessment to explore the impacts of proposals on the historic environment.	A full Historic Impact Assessment is being prepared to inform the Submission Plan.	No change.
SP8	Recommendation that the policy is expanded to specifically address landscape implications, and updated landscape evidence work if prepared.	The Landscape and Visual Appraisal for Land at West of Braintree provides a high-level appraisal of the development potential of the site in landscape and visual capacity terms. The study assesses and highlights the landscape sensitivities / constraints and opportunities for potential development of West of Braintree. These	Include the recommendations from the Landscape and Visual Appraisal for Land at West of Braintree in the supporting text to Policy SP8. Incorporate the key elements from the Study's recommendations in Policy SP8.

Ref	Key Issue / Comment	Council's Response	Change to the Plan
		constraints and opportunities will be incorporated into the policy text.	
SP8	Concern that this allocation is wholly dependent on Braintree delivering the site, and if delivery is delayed this will have implications for housing delivery in Uttlesford	The delivery of the West of Braintree Garden Community is not wholly dependant on Braintree. Delivery can be phased to enable development to be brought forward in both Uttlesford and Braintree. The phasing of the development will be determined as part of the preparation of the Garden Community Development Plan Document.	No change.
SP8	The policy does not take into account the minerals site which is located within the overall site. UDC should make reference to this.	Disagree there is no need for such a reference.	No change.
SP8	Network of safe walking and cycling opportunities needs to be reworded to include horse riders, especially as it regards links to the Flitch Way which is a Bridle Path	This is not necessary. Policy TA2 includes reference to transport networks for a variety of users including horse riders.	No change.
SP8	Places of worship need to be included in the list of facilities	The list of community facilities is not exhaustive. The exact nature of community facilities will be determined through the preparation of the Development Plan document for the West of Braintree Garden Community.	No change.
SP8	Concern over the light pollution	Policy EN19 – Light Pollution sets out criteria to minimise the impact of lighting schemes.	No change.
Para	Questioning why housing delivery does not start until 2025/26 when Braintree	The West of Braintree Garden	No change.

<b>Ref</b>	<b>Key Issue / Comment</b>	<b>Council's Response</b>	<b>Change to the Plan</b>
<b>3. 62</b>	starts building well before then	Community is a large and complex development. It is considered appropriate to phase the development across Uttlesford District and Braintree Districts.	
<b>Para 3.62</b>	Braintree plan to delivery 30% affordable housing, will Uttlesford still provide 40%?	The 40% affordable housing provision for Uttlesford reflects the evidence for Uttlesford and is considered appropriate.	No change.
<b>Para 3.62</b>	Concerns over the loss of Andrewsfield	Andrewsfield Airfield is within the area of search for the West of Braintree Garden Community. This means that when the Development Plan Document seeks to fix the boundaries of the development within the area of search it could include Andrewsfield Airfield.	No change.
<b>Para 3.62</b>	Suggestion that Brownfield land should be used first	As Paragraph 2.9 of the Draft Regulation 18 Plan states Uttlesford has relatively few previously developed and brownfield sites so it would not be possible to meet the housing need by adopting a brownfield first approach.	No change.
<b>Para 3.62</b>	No consideration has been given to electric cars	Policy TA3 sets out requirements for the provision of electric charging points in new development.	No change.
<b>Para</b>	Concerns over the sustainability of water provision	Policy EN13 sets out the	No change.



Ref	Key Issue / Comment	Council's Response	Change to the Plan
3.62		approach to protection of water resources. The Development Plan document for West of Braintree Garden Community will set out more detail.	

## Uttlesford District Council – Proposed Response

### Chapter 3 Sustainable Development

Added text – shown underlined

Deleted text – shown crossed out or struck through

#### Development within Development Limits Policy SP9 and associated paragraph 3.63

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
	Overall support for the policy	Noted	No change.
	Additional criteria suggested covering impacts on natural environment, historic environment, air quality, infrastructure	<p>It is considered appropriate to extend point 2 to refer to the natural environment and point 3 to heritage assets</p> <p>When dealing with planning applications the plan must be read as a whole. It is therefore proposed to include reference to other policies in the supporting text as this is not necessary.</p>	<p>Paragraph 3.63 – amend sentence .. Development within the development limit is generally considered sustainable and acceptable in principle subject to a detailed assessment of issues such as design, amenity, highways, and impact on heritage assets or the natural environment <u>and is in accordance with other policies in the Local Plan.</u></p> <p><b>Policy SP9 - Development within Development Limits</b>            Development will be permitted on land within development limits if:            1. It is in accordance with any existing allocation;            2. It would be compatible with the character of the settlement and, depending on the location of the site, its countryside setting <u>and natural</u></p>

			<p><u>environment;</u>  3. It protects the setting of existing buildings and the character of the area and <u>significance of heritage assets;</u>  4. Development provides adequate amenity space and does not result in an unacceptable loss of amenity space;  5. It does not result in any material overlooking or overshadowing of neighbouring properties;  6. It would not have an overbearing effect on neighbouring properties; and  7. It would not result in unreasonable noise and/ or disturbance to the occupiers of neighbouring properties by reason of vehicles or any other cause.</p>
	<p>Developers are seeking a relaxation in the policy to allow greater flexibility as this can lead to sustainable development.</p>	<p>The Sustainability Appraisal considers an alternative more flexible approach to the policy where development limits are removed and development can come forward outside the existing limits. The Sustainability Appraisal finds that there would be negative implications from this approach, in particular on these regarding landscape, soil, sustainable travel, accessibility and education. The Appraisal concludes that a more sustainable approach is for development outside existing development limits to be identified through allocations in a plan led system, rather than come forward in piecemeal developments that may not be able to offer the critical mass to make them sustainable regarding infrastructure provision.</p>	<p>No change.</p>



## Uttlesford District Council – Proposed Response

### Chapter 3 Spatial Strategy

#### Policy SP10 and associated paragraphs 3.64 -3.74

Added text – shown underlined

Deleted text – shown crossed out or struck through

#### Development in Countryside 3.64 – 3.74

Ref	Key Issue (from overarching summary)	Council's Response	Change to the plan
Para 3.64	Development of Garden Communities on rural land seen as contradictory to protection of countryside assets	In order to accommodate the scale of growth envisaged in the Local Plan a Spatial Strategy that includes the development of Garden requires land uptake and in a rural District like Uttlesford, the only land available is rural. Concentrating development at the Garden Communities allows the Council to meet its housing requirements while limiting impacts on existing communities. The countryside assets will continue to be protected as evidenced by policies in the Local Plan.	No Change
	Scale of new settlement development does not respect quality or character of area	The scale of the new settlement is dictated by the number of dwellings required to be accommodated up to 2033 and beyond. However, development of these settlements will be informed by Historic Impact Assessments and the quality and character of the area will be taken into account.	No change
Para 3.67	Inflexibility of approach to Green Belt release regarded as hindering land that could contribute to vitality of Type A Villages such as Leaden Roding	The Green Belt has contributed to the low percentage of built form throughout the designated area and releasing any land would be	No change

	Request to undertake Metropolitan Green Belt Review	<p>contrary to the purposes of the Green Belt.</p> <p>Infilling and limited development or redevelopment of sites within development limits will be allowed providing the proposed development is in character of the settlement and its setting.</p> <p>A Green Belt review was undertaken in March 2016 in accordance with NPPF and a few minor modifications were made and therefore there is no justification to undertake another review.</p>	No change
Para 3.68	Land south of A120 should be released from Green Belt to employment uses as it does not currently fulfil Green Belt Purposes.	The land south of A120 serves to prevent neighbouring towns merging as well as checking unrestricted sprawl.	No change
Para 3.68	East Hertfordshire District Council - maintains its view that land to the south of the A120 adjacent to Bishop's Stortford does not meet the purposes of the Green Belt because it is surrounded by built development, the bypass and therefore it should be released from the Green Belt designation and reallocated to employment uses.	<p>East Hertfordshire District Council should meet its employment land needs. The land in question checks the unrestricted sprawl of Bishop's Stortford. Development of the land would reduce the gap between Bishops' Stortford and Birchanger physically as well as reduce the perceived and actual distance between them.</p> <p>A Green Belt review was undertaken in March 2016 in accordance with NPPF, and the only amendments recommended are minor to reflect existing development that has already taken place.</p>	No change
Para 3.71	Countryside Protection Zone's integrity compromised by development of 300 dwellings and additional smaller site allowed on appeal	Noted and development was allowed on appeal due to UDC's failure to demonstrate a 5 year land supply. However, these developments do not detract from the purposes of the CPZ as whole.	No change
Para	Conflict between agricultural land and supporting	Noted but Policy EN8- Protecting the Natural	No change

3.74	biodiversity. Need to support biodiversity should be prioritised.	Environment does prioritise biodiversity.	
	Objection to omission of reference to Countryside Protection Zone (CPZ) after “MGB” in penultimate sentence in paragraph 3.74.	Noted and “ MGB” added text of the penultimate sentence of paragraph 3.74.	Alternative uses of land in the countryside will be supported where they comply with Countryside, MGB, CPZ and other policies where the environment and character of the countryside is protected.
Policy SP10	Metropolitan Green Belt not delineated in accordance with NPPF paragraph 85 stating the LPA “should define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”	The Green Belt Review 2016 was undertaken in accordance with NPPF and the boundaries were delineated in line with NPPF requirements.	No change
Policy SP10	Amalgamation of three policies i.e. (Saved Policy S6 (Metropolitan Green Belt), Policy S7 (The Countryside) and Policy S8 (Countryside Protection Zone) weakens the longstanding Policy which ensures that the airport remains an airport in the countryside as original envisaged. The wording of Policy 8 should therefore be retained in its entirety in Policy 10 to ensure that the Countryside Protection Zone is maintained.	Disagree, amalgamating policies does not reduce their effectiveness in achieving their objectives. Inclusion of saved Policy 8 in SP10 paragraph 4 is appropriate as part of a wider policy seeking to protect the countryside within the district. Although the current wording is presented positively the policy seeks to ensure that the airport remains an airport in the countryside.	No change
Policy SP10	SP10 protects land for its intrinsic character and beauty whilst NPPF paragraph 17 requires LPA to “recognise” the intrinsic character and beauty of the countryside	Noted, the Council considers it appropriate to protect the countryside for its intrinsic beauty, and that this is a reasonable planning objective that is not contrary to the NPPF.	No change
Policy SP10	Reference to Development Limits should be replaced with a broad definition of settlements beyond which land is considered to be Countryside	Development Limits protect locations where the principle of development would not be appropriate and directs development towards	No change

	(approach being followed by other LPAs)	suitable sustainable locations. A more flexible approach to Development limits would have negative implications on landscape, soil, sustainable travel, accessibility and education. A more sustainable approach is for development outside existing limits to be identified through allocations in a planned system, rather than come forward in piecemeal developments that may not be able to offer the critical mass to make them sustainable regarding infrastructure provision.	
Policy SP10	Policy SP10 seen as all-encompassing in characterisation of the countryside and makes very little distinction in quality of land. Classification of agricultural land as Class 2 underestimates subtleties of individual areas especially land that is marginal to farming and is outside Development Limits There should be a reclassification of land to identify land marginal to farming suitable for development	Natural England is responsible for Agricultural Land Classification and the Council cannot undertake a reclassification of agricultural land.  Policy SP10 makes provision for considering proposals in the Countryside on a case by case basis.	No change
Policy SP10	Purposes of both the CPZ and MGB are supported but concern was raised about UDC's rigid adherence to historic boundaries  Suggestion to limit CPZ to the line of B1256 to form a buffer to airport growth in the south  Current southern CPZ boundary regarded as unnecessary restrictive and being of limited value	Noted. The review of the CPZ identifies the loss of parcels 1 and 2 (those substantially south of the B1256) as having a moderate and high harm (respectively) to the CPZ. Parcels 3, 4 and 5 are rated as high harm, and the only potential amendment to a boundary proposed by the study is to parcel 3 where it suggests "Consider extending the boundary of the CPZ to Fritch Way to the south of Takeley Street, which would help to prevent further consolidation of the hamlet and maintain its rural character".	No change.
Policy	Due to restrictiveness SP10 certain sustainable	According to SP10 development appropriate to	No change



SP10	development opportunities classed as “countryside and protected.” UDC to take more flexible approach in line with NPPF paragraph 55 in development within countryside to enhance or maintain rural vitality.	rural areas will be permitted subject considerations of Policies C1-C4.	
Policy SP10	Policy 10 defines Countryside as land outside Development Limits and identified New Garden Communities. However, currently countryside includes the majority of this land and Policy 10 will destroy irreplaceable large tracts of arable land and ancient woodlands.	The three Garden Communities are site allocations in the Local Plan have been allocated for development and as such the land will be excluded from Countryside through the adoption of the emerging Local Plan. Proposals for development will need to take into account provisions of SP10.	No change.
Policy SP10	Paragraph 4 of Policy 10 should be amended to include “will be protected against development”.	Noted, the Council considers the policy protects the Countryside from inappropriate development	No change.
SP10	Natural England is pleased to see recognition of the importance of best and most versatile Policy agricultural land however the sentence as a whole is currently unclear. It would make sense to split the reference to biodiversity into a separate bullet point.	Agreed and reference to biodiversity is a separate bullet point	<ul style="list-style-type: none"> <li>• Protect the best and most versatile agricultural land;</li> <li>• <u>Protect biodiversity;</u></li> </ul>

## Uttlesford District Council – Proposed Response

### Chapter 3: SP11 London Stansted Airport

#### Policy SP11 London Stansted Airport

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
SP11	Policy SP11 (Stansted) Should be amended in line with Objective "C " Plans should not allow any further growth beyond the 35 million passengers per annum (mppa) approved limit".	Noted. To do this would be in contravention of government policy. This allows Manchester Airport Group (MAG) to put in a planning application that could be considered on its stand merits.	No change.
SP11	Concerned that the policy does not include any specific recognition that further development of the airport, notably through the growth in passengers, may potentially have an adverse impact on water resources, both water supply and waste water treatment. The cumulative impact of growth passenger numbers at the airport and adjacent Easton Park garden community on water resources has not been adequately assessed. We consider that the policy does not, in our view, fully engage with national policy and the National Planning Practise Guidance. We consider it is not consistent with the national policy position and is therefore unsound. This unsound position could be overcome by inserting under the paragraph heading 'Airport Development' the following sentence as point 10: No development including growth in passenger numbers will be permitted unless it has been demonstrated that either sufficient water resources infrastructure already exists or that additional water resources can be provided before the development becomes fully operation. This potentially significant development should be subject to the aforementioned WCS assessment.	Noted. Water Cycle study shows that there is no deterioration in water quality. The detailed WCS has considered potential cumulative impacts from the Airport. Amendment not necessary.	No Change.

SP11	<p>Natural England recognises strategic importance of the airport to the local area. Important that existing / future proposals for expansion are properly assessed for impacts on the environment, in particular on Hatfield Forest SSSI. Natural England Welcomes 4<sup>th</sup> Criteria for assessment of proposals but would like to see specific mention of safeguarding / enhancing SSSI in the policy.</p>	<p>Noted. Support welcomed. It is not necessary to mention safeguarding or enhancing the nearby SSSI within this policy. The Plan should be read as a whole and policy EN8 deals with the impact of development on SSSIs.</p>	No Change
SP11	<p>ECC welcomes that UDC is seeking to support growth at the airport within SP11. Noted that reference is given to MAG's sustainable Development Plan, but SP11 does not explicitly refer to maximum use of the existing runway. ECC will be interested in appreciating how UDC will ensure how the submitted planning application will shape emerging policy.</p>	<p>Noted. Support welcomed. The policy does not need to make specific reference to maximising use of the existing runway, as this may not always be the most appropriate way to manage development. Such considerations are capable of being dealt with through the consideration of a planning application.</p>	No Change
SP11	<p>ECC recommends that the supporting justification text and strategic spatial policy for the Airport include reference to the Stansted Airport College. Harlow College, in collaboration with MAG and supported by ECC, have been successful in a bid to the South East LEP to develop and operate a college campus centrally located within the Airport grounds. All partners agreed that the campus should be named Stansted Airport College. Construction of a new 2000m<sup>2</sup> college building located near the main terminal building is to be flexible in design to accommodate the needs of the curriculum and to provide suitable warehouse type space for aircraft maintenance courses. Overall design will also consider potential future expansion with key positives which include: Addressing shortfall of FE provision in Uttlesford; early discussions suggests the scheme is supported by local planners; is supported by MAG and allows development to be flexible in design providing future expansion possibilities. When fully operational/ at full capacity the campus will provide training</p>	<p>Noted. Support Welcomed. Scheme working towards a September 2018 completion in time for the start of the 2018 / 2019 Academic Year. There is no need for the policy to reference the new college. However, we fully support its construction, and will support any proposed expansion subject to interaction with the airport. It would be useful to add reference to it in the supporting text.</p>	<p>Add the following to the supporting text: "Stansted Airport is also 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</p>

	opportunities to 530 learners. In addition to providing support for the expanding airport the proposed curriculum will also focus on areas that match broader and growing skills required along the M11 Corridor and Harlow Enterprise Zone.		hospitality, retail and events management. These will offer opportunities for local people to improve their career prospects.”
SP11	<p>Passenger Transport: The draft Plan designates the Airport as a Regional Interchange designation in terms of public transport. UDC should promote this major interchange facility in its own right, i.e. as a major interchange which happens to be at the airport (rather than just Stansted Airport bus station). In the past many bus passengers would have interchanged in Bishops Stortford, however Stansted offers a far greater potential as an interchange location for Uttlesford residents. However, it is not necessarily seen, promoted or used in this way. Promotion of this goes hand in hand with the obligation placed upon London Stansted Airport to increase its proportion of passenger and staff accessing the airport sustainably. The additional passengers that might use this in its capacity as an interchange could make a significant difference in the quantity and quality of public transport services accessing the site “and thus the future viability of those services” many of which could give both direct and indirect benefits to Uttlesford residents and businesses.</p>	<p>Noted. The Airport has a 51% modal share of public transport. Promoting the airport as the transport hub is part of local plan policy, the airport plan and the Airport Transport Forum.</p>	No Change.
SP11	<p>With continued airport growth, discussion is required in relation to the M11 motorway from south of Junction 8 at Bishop’s Stortford to Junction 9/9A at Great Chesterford/Stump Cross, A120 close to Bishop’s Stortford and any B class roads that will impact highway capacity in Hertfordshire.</p>	<p>Noted. The Airport has a 51% modal share of public transport. Promoting the airport as the transport hub is part of local plan policy, the airport plan and the Airport Transport Forum. There are already planned improvements to junction 8 of the M11. Furthermore, the transport modelling supporting the Local Plan identifies the need for ‘smart’ motorway measures between junction 8</p>	No Change.

		and junction 9 of the M11, to be delivered by Highways England. The transport modelling also identifies improvements to the A120 and local B roads.	
SP11	Draft Local Plan acknowledges interdependencies between Airport and Harlow, East Herts and Epping Forest as Airport provides and underpins employment for a pool of workers and businesses from neighbouring authority areas. Also welcome principle of maximising potential of unused/ under-used land within the Airport which had previously been identified within the Adopted Local Plan specifically for development directly related to or associated with the airport. SP11 includes allocation of 55Ha site within Northern Ancillary Area for B2 and B8 employment uses not restricted to airport-related development and also allows small scale ancillary retail and leisure. Helpful to define what is meant by small scale in this regard. The effective management of a wider variety of use classes and the juxtaposition with established uses within the airport will require careful consideration; the definition of thresholds/safeguards within the policy may be helpful in the preparation of briefs/masterplans.	Noted. Support welcomed. The Northern Ancillary Area has great potential to be redeveloped for commercial uses and there is no evidence of its need to be retained for airport-related development.	No Change.
SP11	SP11 is in accordance with the LSCC Vision.	Noted. Support welcomed.	No Change
SP11	Policy should make specific mention to Junction 8 of the M11. Policy references in Airport development Part 9 that proposals should incorporate suitable road access for vehicles including any necessary improvements required as a result of the development. No mention is made to the strategic highway network. With the proposed easing of the restriction to the use of the Northern Ancillary Area to non-airport related employment uses, in addition to growth at the airport itself, measures will need to be taken to ensure that the necessary junction upgrades are made in a timely fashion. EHDC committed to working with UDC, Hertfordshire CC, Essex CC and the Highways Agency to ensuring that the appropriate mitigation measures are delivered.	Noted. Work to junction 8 of the M11 has been approved. Any planning application on the Northern Ancillary Area will be subject of a transport assessment. UDC is also committed to joint working to ensure that necessary junction upgrades are made in a timely fashion.	No Change.
SP11	Proposed development will be assessed against the Local Plan but UDC's Corporate Plan says it will oppose a 2nd runway at Stansted. Proposed Action: Add 'in line with UDC's Corporate Plan. Should make provisions to ban night time flights with no increase in permitted flightpaths Proposed Action: Policy to be	Noted. The policy does not contradict the Council's corporate position regarding a second runway. The Council	No Change.

	amended.	holds no power to ban night flights.	
SP11	<ul style="list-style-type: none"> <li>Statement on airport parking help to protect residential amenity is not necessarily factual.</li> <li>Current levy placed on airport users in relation to car park charges needs to be reconsidered as it is cheaper to take a taxi, therefore local residents are plagued with cars on streets, near bus stops, or in local rural residential car parks. Proposed Action: Policy is to be amended, and consideration to the statement is investigated with a view to create a more competitive solution to the end user.</li> </ul>	<p>The policy says that proposals for airport related parking should be within the strategic allocation and will need to demonstrate that they will not lead to detriment to the amenity of the area and neighbouring occupiers.</p> <p>Car Parking charges are a commercial consideration for the airport operator.</p>	No Change.
SP11	Airport Related Parking must comply with current planning restrictions and not be subject to suggestions in the Draft Plan (Pg. 48). All parking must be contained on-airport land to prevent encroachment into the CPZ as per the original planning condition which must remain in force to ensure amenity of residents. A change in policy will mean a further spread of irregular parking and make the airport less commercial. Already problems of offsite parking in Takeley which are regularly reported to enforcement. If the policy is weakened as suggested in the draft Plan this will be exacerbated. Must remain a priority that airport related parking occurs on site. Not ensuring airport car-parking is contained on site would undermine aims of airport surface access strategy. Also Government policy as outlined on (Pg. 46) within the Aviation Policy Framework.	Proposals for airport related car parking outside of the airport strategic allocation will only be permitted if there is a long term need that cannot be met within the airport and the proposals that are put forward are demonstrably well related to the road network, have no adverse impact on amenity and are in accordance with the most recent sustainable development plan for London Stansted.	Change Policy to read: "There is demonstrated to be a long term car parking need that cannot be met at <del>the airport</del> <u>within the Airport Strategic Allocation.</u> "
SP11	Airport may consider that 'full capacity' means something in excess of 25mmpa. A scoping opinion was submitted in June 2016 seeking to raise the limits to 45mmpa /285,000 ATMS's However, SP11 records show no such constraint, beginning 'The Growth of London Stansted Airport will be Supported'	Noted. Government policy suggests that strong growth in passengers over the past five years including in the South East	No Change.

		<p>of England is putting significant pressure on existing infrastructure, despite significant investments by airports over the past decade. They are aware that a number of airports have plans to invest further, allowing them to accommodate passenger growth over the next decade using their existing runways, which may need to be accompanied by applications to increase caps. The government agrees with the Airports Commission's recommendation that there is a requirement for more intensive use of existing airport capacity and is minded to be supportive of all airports who wish to make best use of their existing runways including those in the South East. The exception to this is Heathrow, whose expansion is proceeding through the draft Airports NPS process.</p>	
SP11	<p>To be consistent with Objective 2c, Policy SP11 should be amended as follows: The growth of London Stansted Airport will be supported up to the limits already permitted which are 35mppa and 274,000 ATMs. Proposals for the development of the airport and its operation, together with any associated surface access improvements, will be assessed against the Local Plan policies as a whole. The operational capacity is restricted to 35mppa and 274,000 ATMs and this Policy does not endorse any increase on those limits. Proposals for any development</p>	<p>Noted. Government policy suggests that strong growth in passengers over the past five years including in the South East of England is putting significant pressure on existing infrastructure, despite</p>	<p>No Change.</p>

	<p>will only be supported where all of the following criteria are met: [including] 2. They contribute to achieving the latest national aviation policies; 3. They are in accordance with the latest permission, subject to the operational limits of 35mppa and 274,000 ATMs not being exceeded;</p>	<p>significant investments by airports over the past decade. They are aware that a number of airports have plans to invest further, allowing them to accommodate passenger growth over the next decade using their existing runways, which may need to be accompanied by applications to increase caps. The government agrees with the Airports Commission's recommendation that there is a requirement for more intensive use of existing airport capacity and is minded to be supportive of all airports who wish to make best use of their existing runways including those in the South East. The exception to this is Heathrow, whose expansion is proceeding through the draft Airports NPS process.</p>	
SP11	<p>Planning permission has been granted for a new arrivals terminal, with work starting in 2018 and to be completed in 2021. WAPC remains concerned over the future development of the airport, including increased passenger numbers which cannot be supported by current rail or road infrastructure. Also concerned over air quality, noise and change to flight path.</p>	<p>Noted. Any planning applications will need to be accompanied by a Transport Assessment showing how trips by sustainable modes can be supported.</p>	No Change
SP11	<p>Noting paragraph 3.76 on the growth of Stansted Airport, we trust that the support of Uttlesford District Council extends only to the mentioned planning consent of 2008 for growth up to 35mppa. Even this amount of increase will be quite intolerable for residents of Great Hallingbury who endure 70% of</p>	<p>Noted. Government policy suggests that strong growth in passengers over the past five years including in the South East</p>	No Change.



	<p>departure flights overhead. We trust also that the required road infrastructure would be put in place before any further increase in flights. Great Hallingbury Parish Council has not in the past supported non-airport related business on Stansted Airport land, but because this is a 'Brown Field' site the use for non-airport related business makes sense.</p>	<p>of England is putting significant pressure on existing infrastructure, despite significant investments by airports over the past decade. They are aware that a number of airports have plans to invest further, allowing them to accommodate passenger growth over the next decade using their existing runways, which may need to be accompanied by applications to increase caps. The government agrees with the Airports Commission's recommendation that there is a requirement for more intensive use of existing airport capacity and is minded to be supportive of all airports who wish to make best use of their existing runways including those in the South East. The exception to this is Heathrow, whose expansion is proceeding through the draft Airports NPS process.</p>	
SP11	<p>Night time flights contribute to people's ill health. Increased freight flights are a nuisance at 2.30 am. Majority of people do not support UDC's enthusiasm for further growth a Stansted. Still not using the extra 10 million increases to 35mppa granted after a five-month public enquiry in 2007. Suggestion: Expansion to 35mppa or 45mppa should only be achieved with flights operating during normal daytime hours and banned between 11pm and 6am. Existing permitted flight paths should remain and not be breached as they are currently!</p>	<p>Noted. The Council holds no power to ban night flights.</p> <p>On airport parking does help protect residential amenity. If some passengers chose to not to use it, then those passengers</p>	No Change.

	On airport parking helps to protect residential amenity. This is not true because high parking charges often mean someone is paying more than the cost of their flight to park and so travellers park on local streets near bus stops or use taxis.	will impact of the amenity of nearby residents. However, not all passengers chose to do that.	
SP11	Inconvenience of illegal parking by airport users in nearby locations is a serious blight on amenity of local residents and character of neighbouring villages and countryside. Planned passenger growth of the Airport will exacerbate this problem unless there is an effective car parking management strategy. This needs to ensure that not only is there is enough land allocated within the boundary of the airport for air passengers to access on-airport car parking but also that mitigation measures are in place to penalise and reduce fly-parking. Whilst improving public transport to, from and within the airport is to be supported; the additional attention on the development of cycling and walking routes to the airport seems somewhat questionable given the nature and scale of the operation. Also, it is not clear whether this provision relates to passengers or employees.	Noted. It is the council's policy that there is sufficient parking within the airport. The policy relates to both passengers and employees.	No Change.
SP11	Airport Safeguarding: Airport safeguarding element of the policy is a vital component of land use planning and one which is integral to maintaining the safe operation of the airport.	Noted	No Change
SP11	Access to the Airport: UDC's ambition to see the airport be a national and local transport interchange be 'maintained' is welcome, however to align with Stansted's ambitions, the policy wording should be more ambitious. UDC should consider amending 'maintained' to 'enhanced' or 'maintained and enhanced' and should include a commitment to partnership with the airport from bodies such as the Council and other key organisations such as HE and ECC, to achieve this aim.	Noted, amendments proposed to the paragraph to ensure the necessary public transport infrastructure and service capacity improvements are provided to accommodate passenger numbers.	Change SP11 as follows:  Access to London Stansted Airport.  <del>The necessary public transport public transport infrastructure and service capacity to serve the airport and meet permitted passenger numbers must be maintained and improved accommodate passenger movements. The</del>

			<u>necessary public transport infrastructure and service capacity to serve the airport and meet permitted passenger numbers must be maintained and enhanced to accommodate passenger numbers.</u>
SP11	1: Supported, but should explicitly exclude the Northside allocation for clarity.	Agree, this is the intention of the policy which is clear elsewhere, but not here.	Amend the following text:  “1. They are directly related to airport use of development, <u>apart from within the North Stansted Employment Area</u> ”
SP11	3: Delete. Not clear why this is necessary. As written this clause applies to all applications for development and there is no practical or lawful way in which all development proposals can be in accordance with previous permissions. For example, it is not possible for an alteration to the planning caps to be in accordance with the latest permission which restricts operations.	Agree, the point of submitting a new planning application is to seek permission for a new form of development. Delete Airport Development Point Three	Delete Airport Development point 3.
SP11	4: It is not possible to define a ‘significant increase’ compared to an ‘increase’ in ATMs. ‘Adverse’ effects on their own don’t lead to the need to refuse planning permission: this is a too stringent test whereas ‘significant adverse’ aligns with NPPF. ‘Disturbance’ is not a recognised environmental impact criterion. As a minimum, the clause should be amended to: ‘Do not result in an significant increase in Air Transport Movements that would lead to significant adverse effects on the amenities of surrounding occupiers or the local environment (in terms of noise, disturbance, air quality and climate change impacts); This sub-clause and the policy as a whole however, does not allow any balancing of economic or social benefits. As a result, the alignment with the NPPF is questioned and generally clarity is required in the policy as to how the LPA will be able to form a balanced judgement on applications taking into account the principals of sustainable development.	Noted. Rerword to deliver a more rounded and overarching policy.  The introductory text under “Airport Development” states that proposals... will be assessed against the Local Plan policies as a whole. This will allow for the allow the LPA to form a balanced judgement taking into account the principals of sustainable development.	Amend criterion 4 to read:  Do not result in an <u>significant</u> increase in Air Transport Movements that would <u>lead to significant adverse effects on</u> the amenities of surrounding occupiers or the local environment (in terms of <u>but not limited to noise, disturbance amenity, congestion, air quality and</u>

			climate change impacts);
SP11	5: Delete. Baseline position to comply with this clause would be a limit that will have been judged previously acceptable (and therefore likely operational limit controlled by planning condition). Unreasonable therefore for further development to 'improve' on such a limit, national policy required only that development does not give rise to 'significant adverse affects' Policy is also partially duplicative of clauses 4&6	Noted. This is now covered in the amended criterion 4.	Delete criterion 5.
SP11	Clause 6 would be improved and consistent with national policy if the relationship with planning permission was altered to the airport's noise action plan. Suggest amendment to: Include an effective noise control, monitoring and management scheme that ensures that current and future operations at the airport are fully in accordance with the policies of this Plan and any planning permission which has been granted the airport's Noise Action Plan.	Noted. Rerword to deliver a more rounded and overarching policy.	Amend criterion 6 to read:  Include an effective noise control, monitoring and management scheme that ensures that current and future operations at the airport are fully in accordance with the policies of this Plan and <u>the airports Noise Action Plan (approved by the Secretary of State on an annual basis) any planning permission which has been granted;</u>
SP11	Clause 7 could only be reasonably expected to apply to applications for increase operations, and needs to be caveated according. The airport company cannot 'require' fleet modernisation from its airlines as this would conflict with the ICAO balanced approach. Measures that can be taken (e.g. charging and compensation) would be covered by 'proposals' which are implied in the policy. Further, it is suggested to delete the word 'significant' as it is logical only that the betterment of effects are proportionate to the size of increase in operations i.e. if there is an application for a small increase in movements, that increase	Noted. Rerword to deliver a more rounded and overarching policy.	Amend criterion to read:  <u>For development that would lead to an increase in the permitted operation of the airport include proposals which will over time result in a significant</u>

	wouldn't be capable to generating a significant reduction in impact. Suggest amendment to: For development that would lead to an increase in the permitted operation of the airport, include proposals which will over time result in a significant diminution and betterment of the effects of aircraft operations on the amenity of local residents and occupiers and users of sensitive premises in the area. through measures to be taken to secure fleet modernisation or otherwise;		<u>proportionate</u> diminution and betterment of the effects of aircraft operations on the amenity of local residents and occupiers and users of sensitive premises in the area. ( <u>such as</u> through measures to be taken to <u>secure encourage</u> fleet modernisation or otherwise);
SP11	Clause 9 is not specific and is unclear as to what the policy is trying to achieve. The airport roads are private and an existing network is already in place. Other policies in this plan deal with the strategic road infrastructure. This clause requires clarification or deletion.	Noted. There are other policies in covering the subject of road access in the local plan.	No change.
SP11	Northern Ancillary Area. This is supported in principal. The final sentence requiring a development brief and master plan should be deleted as the site phasing and development is unlikely to warrant such an approach. Sufficient Controls will exist in the normal planning application processes. Note the reference of 55ha is correct in this policy	Noted. A development brief and masterplan will support comprehensive, managed development of the site.	No Change
3.76	3.76: Now over 25mppa and has operational limits to 35mppa. Capacity not correct expression.	Noted. Change capacity to operating level.	Change to: 25.9mppa operating level.
3.78	3.78: Amendments for accuracy/ clarity:	Noted, agree some changes can be made for clarity.	Amend paragraph 3.78 as follows:  Land at the Airport has previously been identified specifically for development directly related to or associated

			<p>with the airport. The role and function of the airport, however, has <del>changed</del> <u>evolved</u> with a greater <del>emphasis on proportion of</del> 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 <u>and have limited cargo handling capability rather than cargo</u>. 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 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</p>
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			have been <u>empty</u> <u>subject to long and / or frequent periods of vacancy</u> since they were completed.
3.80	3.80: Amend this paragraph for clarity.	Noted	Reword the first sentence of paragraph 3.80 to read: " <u>London Stansted is a Statutory Safeguarded Aerodrome</u> <del>London Stansted lies within an airport safeguarding area</del> "
3.85	3.85. Suggest including reference to the airport. i.e "The Council will continue to work with London Stansted Airport and other District and County Authorities"	Noted	Change Text to read "The Council will continue to work with <u>London Stansted Airport</u> and other District and County Authorities"
SP11	2. Maintaining UDC policy that 'industrial and commercial development unrelated to the airport will not be permitted on site'. Has been a clear and consistent local policy precluding industrial and commercial development unrelated to the airport within the airport boundary, set down in Policy S4 of the current Local Plan. No explanation or justification has been provided for its proposed reversal, as foreshadowed in Para 3.78 and 3.79 of the Draft Plan. The Airport has a significant advantage over other developers of industrial and commercial sites because it can acquire land at its undeveloped value using compulsory purchase powers and it is not a level playing field.	Noted. 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 Stansted Airport.	No Change.
SP11	The jobs growth assumptions in the plan, particularly for Stansted Airport, are not based on a robust evidence base.	Noted. Paragraph 3.76 sets out the job growth assumptions for the airport when it serves 35 mppa.	No Change.
SP11	Local Impact: Proportion of airport employees who are Uttlesford residents is declining. Latest figures (2015) show just 18.3% of employees were Uttlesford residents (MAG/STAL Scoping Report, June 2017, Table 12.1, which cites 2015	Noted. London Stansted Airport is the largest single site employer in the region	No Change

	<p>STAL Employment Travel Survey). By comparison, in 2003, 23.8% of employees were Uttlesford residents (BAA G1 Environmental Statement, Volume 6 - Employment &amp; Housing, Table 5). In numerical terms there were 500 fewer Uttlesford residents working at Stansted Airport in 2015 than in 2003 (2,007 vs 2,519) despite the fact that Stansted grew by more than 20% between 2003 and 2015 from 18.7mppa in 2003 to 22.5mppa in 2015.</p>		
SP11	<p>Airport-related housing demand: Important to recognise it is not just a numbers game but also a question of affordability. Vast majority of new jobs which will be created assuming the Airport grows to 35mppa will be relatively low-paid. Uttlesford house prices will be beyond the means of all but a few airport employees. Stansted Airport's recruitment strategy will not be focused locally.</p>	<p>Noted. London Stansted Airport is the largest single site employer in the region. The delivery of significant new housing in proximity to the airport, including affordable housing, will support airport workers to choose to live closer to the airport.</p>	<p>No Change.</p>
SP11	<p>Application to increase level of permitted flights at Stansted during plan period is premature. LPA should not decide the future increase of use of the single runway. Responsibility of National Government to publish a national Airport Policy including their final decision on additional runway capacity in the South East. To ensure that it is compliant with the Paris Climate Change Accord.</p>	<p>Noted. We will review each planning application received based on individual merits.</p>	<p>No Change</p>
SP11	<p>The Airport appears to be presented just as a tourist base; there is not much suggestion it might help / be linked to local businesses. The roads apart from the M11 access are poor and the area around the airport if planned is haphazard. Given its growth and history, the Society understands the inevitability of its development but unless enjoined it remains a proliferating adjunct.</p>	<p>Noted. Trends indicate that passenger traffic at all airports is predominately leisure rather than business</p>	<p>No Change</p>



## Uttlesford District Council – Proposed Response

### Chapter 3: Spatial Strategy – Policy SP12 and associated Paragraphs

#### Policy SP12

Added text – shown underlined

Deleted text – shown crossed out or struck through

Ref	Key Issue / Comment	Council's Response	Change to the plan
SP12	Bullet 7 to be amended to read- development should not take place in any areas rated higher than low risk flooding.	Policy SP12 is a strategic policy that seeks to positively set out where development will take place and in what form in order to meet the principles of sustainable development. The proposed wording is not positively worded and is not necessary.	No change.
SP12	Implement figurative targets to make policy stronger.	Appendix 2 – Monitoring Framework – sets out targets and the performance measures which will be monitored in order to assess whether the targets are being achieved.	No change.
SP12	The fourth point should be amended to make use of the term historic environment.	The inclusion of the term historic environment in bullet point 4 is not necessary and would narrow the meaning of the bullet point beyond its intended purpose. The character, appearance and	No change.

Ref	Key Issue / Comment	Council's Response	Change to the plan
		setting can be determined by a number of factors not just the historic environment.	
SP12	No targets for energy efficiency are mentioned.	Policies D8, D9 and D10 set out the standards and targets to be met in relation to energy efficiency and reduction of carbon footprint.	No change.
SP12	Plan should have defined targets in regard to emissions.	Appendix 2 – Monitoring Framework – sets out targets and the performance measures which will be monitored in order to assess whether the targets are being achieved. Specific targets regarding the ‘Reduction in levels of air pollution within AQMA’ (part of the targets to be monitored as part of Objective 3b which includes SP12) can be checked in the <a href="#">National Air Quality Objectives</a> The performance measure is the Local Air Quality Updating and Screening Assessment report and Air Quality Progress Reports which are to be collected by Uttlesford District Council.	No change.
SP12	Define previously developed land and the criteria for Under-used land within supporting text to make policy more robust.	Agree that a definition of previously-developed land should be included in the Glossary in Appendix 1 to the	Include the definition of previously-developed land from the National Planning Policy Framework in

Ref	Key Issue / Comment	Council's Response	Change to the plan
		Local Plan.	Appendix 1 – the Glossary
<b>SP12</b>	The policy should include a requirement for the review of all existing settlement boundaries in order to identify opportunities for sustainable development.	The Council considers that the existing development limits remain appropriate. Development limits can be reviewed through the preparation of neighbourhood plans.	No change.
<b>SP12</b>	This policy replaces Policy GEN4, however it does not make provision for development and uses to not be permitted where: a) noise or vibrations generated, or b) smell, dust, light, fumes, electro magnetic radiation, exposure to other pollutants; would cause material disturbance or nuisance to occupiers of surrounding properties.	Policies EN15, EN16, EN17, EN18 and EN19 address the potential impacts of pollutants (including vibration, odour and radiation), air quality, contaminated land, noise sensitive development and light pollution.	No change.
<b>SP12</b>	Irreversible loss of assets (allocated greenfield sites within the DULP eg. as new garden communities) are contrary not only to this policy but also the National Planning Policy Framework and Core Planning principles.	In accordance with national policy the irreversible loss of assets is a matter to be balanced with the benefits of a proposal.	No change.
<b>Paras 3.89-3.94</b>	All new homes should have renewable energy systems built in as mandatory.	This suggestion would not be in accordance with Government policy and would be too onerous. Policies D8, D9 and D10 set out the standards and targets to be met in relation to energy efficiency and reduction of carbon footprint.	No change.
<b>Paras 3.89-</b>	New settlements should not only be provided by major developers	The type of delivery for the Garden Communities is yet to	No change.

Ref	Key Issue / Comment	Council's Response	Change to the plan
3.94		<p>be determined. A range of options are possible including delivery led entirely by the private sector such as major developers through to a partnership approach between the public and private sectors or a more public sector led approach such as development corporations.</p>	