

<i>Uttlesford District Council Regulation 19 Pre-submission Local Plan; Summary of Responses</i>	
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UTTLESFORD DISTRICT COUNCIL REGULATION 19 PRE-SUBMISSION LOCAL PLAN	
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SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • The strategic policies in the plan reflect the discussions and agreements reached in the Cooperation for the Sustainable Development Member Board. The plan is based on effective joint working on cross boundary strategic priorities (Epping Forest District Council, PSLP51) • Support for the plan.
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Lack of jobs to support growth, and poor access to inadequate public transport means people will commute long distances to work by car. • Plan for Rapid Transit System is vague. • Infrastructure can't support development. • Destruction of rich farmland, ancient woodland and natural areas. • Building under Stansted flight paths is inappropriate. • The plan is not financially viable. • The plan does not consider sport facilities. • Section 106 is not reliable to deliver planning gain, a CIL is preferable. • Decisions on RIS2 will not be made until 2019, WoB cannot be known to be deliverable. • M11 J8 (and transport infrastructure generally) cannot cope with development. • The North Essex Authorities Inspector's letter, particularly around the Conclusions on the Cross Boundary Garden Communities, needs to be taken into account. • The importance of green spaces in tackling air quality is not taken into account. • Growth data is out of date. • Traffic impacts on Saffron Walden are unacceptable. • Schools cannot cope with development.

MODIFICATION REQUEST	
1. Introduction	
SUPPORT	3
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SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • The plan meets legal compliance requirements as set out in Section 39 of the Planning and Compulsory Purchase Act; • The Plan provides a strategy that seeks to meet the area's objectively assessed needs; • It is also informed by agreements with other authorities, in particular Braintree where the two authorities respective needs; • The Plan is based on an appropriate strategy, has considered reasonable alternatives, and is based on proportionate evidence; • It is an effective Plan that is deliverable over the plan period, and as stated, includes joint working on cross-boundary strategic matters. • The Plan will enable the delivery of sustainable development; • The Council has provided details of co-operative working with Braintree Council in connection with the W of Braintree Garden Community; this includes minutes of meetings, the DPD project group, from 2015 onwards; and • The Council has considered a range of growth options as set out in the Identification of Reasonable Alternatives Paper April 2017. (<i>Galliard Homes, PSLP 775</i>) • ECC considers UDC has met its obligations under Section 110 of the Localism Act regarding the duty to cooperate with regard to those statutory responsibilities of ECC, namely highways and transportation, education, minerals, waste, surface water management, Public Health, and Adult Social Care. <ul style="list-style-type: none"> ○ UDC has engaged ECC at each stage of local plan preparation from the Issues and Options in 2015 through to the Regulation 19 consultation. This has included: <ul style="list-style-type: none"> • a range of UDC and ECC officer meetings to systematically address the Regulation 18 representations made by ECC; • the contribution to the evidence base to support plan preparation and where appropriate supported by MOUs; • officer and member meetings of the Cooperation for Sustainable Development Board; • officer and member meetings to discuss and progress Uttlesford Garden Communities, including ECC Members and Officers playing a full part in Uttlesford's Garden Communities Delivery Board; and • officer and member North Essex Garden Communities (NEGC) meetings as they relate to the West of Braintree Garden Community (WBGC) to ensure a consistent approach to support delivery. • Discussions have also taken place regarding:

	<ul style="list-style-type: none"> • joint working with Essex Planning Officers' Association (EPOA) on joint evidence base and protocols, namely Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS); Essex Wide Gypsy and Traveller Accommodation Assessment (2018); and Unmet Housing Needs Protocol (2017) ○ ECC has been consulted on its service area infrastructure requirements, which have been satisfactorily incorporated into specific policies and supporting text and/or the IDP (unless otherwise indicated in this response where an amendment is required to ensure soundness). (Matthew Jericho, Essex County Council, PSLP 868)
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • The plan lacks an evidence base including a proper Comparative Sustainability Assessment which was embedded into the Plan process as required by the NPPF. (Newport Parish Council , PLSP 2998) • Sustainability issues have to be dealt with before implementation of the plan rather than being subject to post hoc mitigation. (Sustainable Uttlesford PSLP 2040) • Community Involvement process has been ineffective and not in accordance with the Statement of Community Involvement; • Failure to give proper, meaningful consideration to informed responses e.g. reapportionment of GLA forecasts, informed input from both Stansted Airport and Stop Stansted Expansion has not led to change in UDC employment forecasts between Reg 18 and Reg 19; • Strategy based on overstated housing requirements; • Unsound justification for both jobs and houses; • Forecasts upon which the Plan is based are not evidenced and alternative forecasts have not been prepared or tested; • The Local Plan is not consistent with national policy i.e. the SHMA failed to comply with the 2012 National Planning Policy Framework ("NPPF") which included at para 159 and failure to take account of latest Government aviation policy which favours expansion at Heathrow. (PSLP 638) <ul style="list-style-type: none"> • Local Plan should be scrutinised against the 2018 NPPF; (PSLP755) • Ineffective public engagement since it has been one-way (PSLP699) • This consultation may be correct and legal. This consultation is just so complicated and difficult to comment on it is effectively useless. How are local people to have their say when all of this is just such hard work! Not a level playing field for objectors! (PSLP 719) <p>This consultation is very defective, in several ways. In order to comment, the user accesses three internet pages, as follows:</p> <ol style="list-style-type: none"> a) 'The Regulation 19 Pre-submission Local Plan and how to comment' at https://www.uttlesford.gov.uk/article/4684/The-Regulation-19-Pre-submission-Local-Plan-and-how-to-comment#rep-from , hereafter 'Page (a)'. This page includes 'Documents which make up the Local Plan' at the bottom and 'Guidance Notes' which are accessed about two-thirds of the way down the page. b) 'Uttlesford Uttlesford District Council Regulation 19 Pre-submission Local Plan' at https://uttlesford-consult.objective.co.uk/portal/planning_policy/local_plan_2018/udc_reg_19 , hereafter 'Page (b)'. This page includes a tab at the bottom, 'Supporting Documents', which includes 'Guidance Notes'. c) 'Consultation Portal' at https://uttlesford-

	<p>consult.objective.co.uk/portal/planning_policy/local_plan_2018/udc_reg_19?pointId=4918009 , hereafter 'Page (c)'.</p> <p>Issues</p> <ol style="list-style-type: none"> 1. The criteria which determine whether a document is included on Page (a) or Page (b) are unclear. 2. Although the 'Guidance Notes' are available from both Page (a) and (Page b), the access is not prominent on either page. 3. Apparently it is not possible to e-mail comments direct, as with previous consultations. If a respondent does not want to use the portal, a separate Representation Form must be used for each Policy. This will be a deterrent to some respondents. 4. Page (b) says at the top that the Plan 'has been prepared with reference to the National Planning Policy Framework, the Uttlesford Community Strategy . . .' These two documents are not easy to find, as follows: <ol style="list-style-type: none"> 4.1 The NPPF does not seem to be included within the 'Documents which make up the Local Plan' at the bottom of page (a), although it is included under a separate heading about two-thirds of the way down. It is not included in the 'Supporting Documents' at the bottom of page (b). 4.2 The Uttlesford Community Strategy does not seem to be included within the 'Documents which make up the Local Plan' at the bottom of page (a). It is not included in the 'Supporting Documents' at the bottom of page (b). The general search feature is as helpful as usual (not at all). I have not found this document, despite my best endeavours. 4.3 The citing of these two documents at the top of Page (b) should include references as to where they can be found. 5. When the respondent clicks the Add Comments box on Page (c), several questions and boxes unexpectedly appear. The 'Guidance Notes' include: <p>Part B – Your Representation</p> <p>Question 3</p> <p>Please specify which part of the Pre-Submission Local Plan your comments relate to by choosing one of the following:</p> <ul style="list-style-type: none"> – Paragraph: for a representation on wording or content of a paragraph in the Pre-Submission Local Plan – Policy: for a representation on the wording or inclusion or omission of a policy in the Pre-Submission Local Plan. – Policies Map: for example a map, site reference or the wording or content of plans, tables or appendices. <p>But Question 3 does not appear when Add Comments is accessed. The questions presented to the user relate to the Plan as a whole, rather than the particular Policy.</p> <ol style="list-style-type: none"> 6. The Guidance Notes refer to Question 4(1), 4(2) and 4(3). They are actually presented as Q1, Q2 and Q3 when adding a comment. Question 5 on the Guidance Notes, Sustainability Appraisal, is actually Q4 when adding a comment. 7. The Guidance Notes give guidance on all the questions. But Page (a) and Page (b) give guidance only on Question 2, 'soundness'. 8. The questions all relate to the Local Plan. They do not refer to the
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	<p>particular Policy which the respondent wishes to comment upon. It is redundant and confusing for Questions 1 to 4 to appear for every response. It is unlikely that the respondent will want to give a different answer to Questions 1, 3 and 4 depending upon the Policy.</p> <p>9. The respondent needs to intuit that comments on the Policy in question are probably best made under Q2 on soundness and that the other questions can probably be ignored. The questions are presented, however, as if an answer is obligatory. It is only when faced with the demand to know, for example, why the Local Plan is considered legally compliant that the respondent realises that some of the questions are best ignored.</p> <p>10. The ancillary questions are another surprise. Having answered 'Yes' or 'No', the respondent is then unexpectedly asked to justify the answer. If the answer to Q2 is No, further questions appear as to why the Plan is unsound, and whether modifications are sought. If the answer to the latter question is 'Yes' a further box appears. By this time the respondent is starting to feel harassed.</p> <p>11. Q1 on legal compliance is not a matter on which many members of the public will feel qualified to comment, beyond the obvious point that UDC must be particularly incompetent if their Plan is not legally compliant. Time constraints would not permit familiarity with the several documents cited in the Guidance Notes.</p> <p>12. Q2 is on soundness. Decisions are needed as to how best to answer Q2a) to Q2d) and Q2). These questions are not easy to interpret, even with the help of the Guidance Notes. It seems possible that some respondents will answer 'No' to all four without consideration.</p> <p>13. Q3 is on the duty to co-operate. There is a particular meaning to this question, not necessarily known to all members of the public. The question should be on the lines of, 'Do you consider the Local Plan complies with the Duty to Co-operate with adjacent local authorities?'</p> <p>14. Q4 is a big surprise. There has been no mention of the Sustainability Appraisal previously. It is not easy to find. The Guidance Notes don't help, and they don't say where it is either. The SA comprises 590 pages, in addition to Annexes A, B and C totalling 232 pages, and a Non-Technical Summary of 57 pages. The respondent is unlikely to have sufficient time to become familiar with all this material. The Supporting Documents within Page (b) include the UDC Reg 19 Local Plan Sustainability Appraisal Environmental Report, and the Non-Technical Summary, but not Annexes A, B and C.</p> <p>15. Unlike the Section 18 consultation, there is no possibility of responding to individual paragraphs but only to policies. Thus if I wish to point out that the statement in 2.5 to the effect that Saffron Walden and Great Dunmow provide 'nearly all the District's food shopping needs' is incorrect, there is nowhere to make the comment.</p> <p>16. Formatting is largely lost when a comment is added to the system. Tables, indents, bold and italics are all, I believe, lost. The only way to add emphasis is to PUT IT IN CAPS. It would be useful if this limitation was noted, rather than respondents having to find out the hard way.</p> <p>17. Once a comment has been submitted, there is then a useful facility which enables a PDF of the comment to be produced. To the user's consternation, however, the paragraphs are lost in this document, and the representation appears as continuous text. Planning Policy have</p>
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	<p>assured me that the paragraphs will appear on submissions as held on the website.</p> <p>18. The Additional Information at the bottom of Page (a) includes ‘Supplementary Paper on Appendix 3’, but there is nothing to direct attention to it. The document actually includes much fuller data than is available in Appendix 3. Completions and existing commitments are only shown as at April 2017, but the document should undoubtedly be more obviously available. The meaning of the last column, PDL/G is not apparent to me.</p> <p>19. Documents referenced in the Plan should be easily accessible, probably by ensuring that they are all included in the Supporting Documents in Page (b). The NPPF should be there and so too should the SHMA, which is not easy to locate.</p> <p>20. All in all, the way the system is set up bears evident signs of haste, and the result is that it seems designed to deter participation, rather than encourage it. It seems likely that it will attract fewer responses than the Regulation 18 consultation, and possibly UDC will wish to say that that is a sign that issues raised in that response have been answered satisfactorily. But any such supposition would be far from correct.</p> <ul style="list-style-type: none"> • Not everyone understands what the Duty to Co-operate is. The question should be, 'Do you consider the Local Plan complies with the Duty to Co-operate with adjacent local authorities?' (PSLP 642)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Replacement of current housing forecast with an evidence based and transparent calculation after removing duplications and errors; • Recalculation of UDC’s forecasts by either discounting 2001 “airport-related” housebuilding or use of a typical base period; • The level of future employment at Stansted Airport and its projected impact on future housing need should be forecast independently, explicitly and transparently; • The overall forecast of jobs growth should be recalculated because it was drawn up specifically to fill the gap between residents and jobs and was not an even-handed projection and failed to consider downsides; (PSLP638) • Plan needs to be assessed against NPPF 2018 (PSLP719) • Take note of all the comments above, and act accordingly. Actions should include: <ul style="list-style-type: none"> ○ Ensure all relevant documents are easy to find. ○ Accept submissions by e-mail. ○ Re-construct the portal, so that general questions are asked once only, and responses to policies are made individually. ○ If questions must be asked on, for instance, the Sustainability Appraisal, make that clear before a response is attempted. ○ Accept responses to individual sections. ○ Ensure the Guidance Notes are correctly referenced. ○ Advise respondents that formatting will mostly be lost. ○ Sort out the paragraphs in the PDF copy. ○ Make the Supplementary Paper on Appendix 3 easily available. ○ Review the whole system with the eye of someone who has never seen it before. Take some time and get it right. ○ Finally, proof read the entire document, preferably by someone

	who understand the difference between ‘dependent’ and ‘dependant’, between ‘may be’ and ‘maybe’, and between ‘complimentary’ and ‘complementary’.(PSLP 642)
2. Spatial Portrait Visions and Objectives	
SUPPORT	12
OBJECT	75
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Plan aims and aspirations of spatial portrait broadly supported; (Landhold Capital Ltd PSLP2992) • The Neighbourhood Plan supports all the objectives of the Local Plan (Saffron Walden and Little Walden Neighbourhood Plan PSLP2938). • Settlement hierarchy and supporting text is supported;(Richard Coke PSLP1821) • Parts of the Spatial Vision as set out at page 12 of the Local Plan are broadly supported especially those reflecting need to support a balanced local economy, better alternatives to the private car, and better access to housing - all whilst protecting the district’s special characteristics.(Martin Grant Homes & Bloor Homes PSLP2880) • Paragraph 6 is strongly supported as London Stansted Airport will form a pivotal part of a highly successful London Stansted Cambridge Corridor. The airport will strengthen the local economy by providing opportunities for employment growth; • Objective 2a is supported as it looks to enable growth of existing and new employment through provision of suitable land in sustainable locations; and • Request to allocate land north of Taylor’s Farm, Takeley Street for light industrial and strategic warehousing and distribution uses. (Pigeon Investment Management Ltd PSLP 2736) • The Plan provides a strategy that seeks to meet the area's objectively assessed needs, including supporting the growth of Stansted Airport. This is to be achieved in a manner that is consistent with achieving sustainable development. The spatial strategy is appropriate and has been agreed following a thorough consideration of reasonable alternatives as set out in the Sustainability Strategy. The West of Braintree Garden Community is an example of the product of effective joint working on cross-border strategic matters. The selected spatial strategy including Garden Communities will enable the delivery of sustainable development.(Galliard Homes PSLP 776) • The Local Plan has been prepared in a robust and positive fashion to ensure that sufficient and suitable land is identified to deliver new homes and employment in a sustainable manner including through creation of Garden Communities; • The new Local Plan is justified with a robust and thorough evidence base including an Infrastructure Delivery Plan, Viability Assessment, Sustainability Assessment including a thorough consideration of alternative Garden Community permutations, and a full range of technical evidence base reports; • The Spatial Vision set out within the Local Plan will be effective due to the vision striking the correct balance between being bold and ambitious to ensure that growth will be delivered, whilst also ensuring that development is brought forward in a sustainable manner alongside appropriate and necessary infrastructure. The Spatial Vision is effective as

	<p>it is underpinned by a set of sound spatial objectives;</p> <ul style="list-style-type: none"> • A key component of the Spatial Vision is the delivery of sustainable new settlements based on Garden Community principles as advocated by the Town & Country Planning; (Association, including the WBGC.(Andrewsfield New Settlement Consortium PSLP 1999) • Support is offered for including a strategic objective (1d) which seeks to protect and enhance local services by ensuring that new infrastructure including sports facilities are provided to meet the needs of people and business. This recognises the role that sports facilities play in meeting this objective; and • Support is also offered for including a strategic objective (1e) that seeks to achieve high quality design that provides a healthy place for residents, visitors and businesses. This recognises the role that design can play in achieving healthy and active environments.(Sport England PSLP 2) • Henham Parish Council supports the Spatial vision, in particular: <ul style="list-style-type: none"> ○ The focus for new development on the towns and larger villages plus the new Garden Communities; ○ The protection of the countryside; ○ The provision of necessary infrastructure etc. to support growth. (Henham Parish Council PSLP 2150) • Objective 1a is supported but the new housing requirement has been under estimated. (Landhold Capital 1283) • Spatial strategy outlined in policy S2 of the draft local plan to be sound. I therefore support it.(PSLP 7)
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • Underestimation of new housing requirement; • Plan as worded fails to represent most appropriate strategy; (Landhold Capital Ltd PSLP2992) • Inconsistency between house price and average earnings data in Plan and UDC Housing Strategy thus hugely over-estimating housing affordability; (Saffron Walden and Little Walden Neighbourhood Plan PSLP2938). • Limitation of new homes to a total of 134 in plan period is not justified as it fails to provide opportunities for sustainable development; and • Plan fails to represent most appropriate strategy; (Richard Coke PSLP1821) • Local Plan strategy is not effective as it fails to balance competing objectives; and • Housing delivery focussed on Garden Communities and low apportionment of growth to other sustainable settlements; (Martin Grant Homes & Bloor Homes PSLP2880) • Although the Plan is legally compliant the Sustainability Appraisal report is flawed and unsound; • The plan is over-dependent on the garden communities and has an over-ambitious expectation as to the timing of delivery and rates of production e.g. The North Essex Authorities (NEAs) have yet to agree collectively what action to take and there could be uncertainty for a period of 3 to 4 years as to whether the West of Braintree GC is deliverable, as the UDC proposed extension of this GC is wholly dependent upon the larger Braintree proposals; and • The current Reg 19 Plan is unsound and the chosen spatial strategy cannot possibly be demonstrated to be the most appropriate one when

	<p>considered against reasonable alternatives. (Bloor Homes Eastern PSLP 896).</p> <ul style="list-style-type: none"> • It is not clear that the Local Plan meets the objectively assessed development and infrastructure needs of the area, including unmet needs of neighbouring areas where this is consistent with policies in the National Planning Policy Framework as a whole; • Insufficient account taken of the interests of South Cambridgeshire District Council. (Abington Park Farm PSLP 836) • The Uttlesford Local Plan needs to address potential impacts, through air quality and recreational pressure, to Epping Forest Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC) and Hatfield Forest SSSI. (Natural England PSLP 2447) • The plan should seek to achieve enhancement in line with your aspiration for the historic environment (Natural England PSLP 2450) • The vision itself (last sentence of point 6) does not consider the direct social and economic benefits that the airport does, and will continue to, bring to the District. Instead, the vision focusses narrowly on managing the airport’s environmental impacts. In order to more adequately reflect national planning policy objectives; • Objective 2c, first bullet: It is not clear what the ‘permitted capacity’ means precisely. For example, the permitted capacity at the time of the draft plan or the permitted capacity approved at any relevant point in time over the plan period. In the context of the airport’s current planning application and also the draft policies that support growth (i.e. SP11), it would suggest the latter. Nevertheless, the objective is not effective as the wording is imprecise; • Objective 2c second bullet: This is supported by Stansted Airport Limited (‘STAL’) in principle but the theme would be more effective if there was an explicit aim and commitment to partnership working (with transport agencies and other authorities) to deliver transport infrastructure; • Essex County Council (ECC) is supportive of Objective 3b, but there is no mention of the opportunities to mitigate and adapt to climate change through green infrastructure as promoted through paragraph 99 of the NPPF (2012). (Essex County Council PSLP 872) • ECC considers that there is a need to reinforce reference to sustainable travel within the spatial vision; and • Specific mention should be made to sustainable travel and links with the new Garden Communities as significant modal shift is required to meet transportation requirements outlined in Policies SP 5, SP 6, SP 7 and SP 8. (Essex County Council PSLP 872) • The plan refers to the ‘London Stansted Cambridge Corridor’ which is not an official geographical area but a term used instead by a consortium supporting development to suit their own interests. Uttlesford District Council should be above, and be seen to be above, commercial interests of this sort and not succumb to political lobbying from such a group; and • The plan is based upon spurious figures for housing growth for which no proper justification is given – the projections are overinflated and some of the highest for any local authority in the country. The sizes of the new settlements that the Local Plan proposes are overly large and the degree of expansion of existing towns and villages is also extreme, especially when considered alongside construction work that has already, or
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	<p>recently, taken place. (PSLP 2050)</p> <ul style="list-style-type: none"> • The Sustainability Appraisal for the Uttlesford Draft Local Plan has been produced by the same author for the North Essex Authorities, and is underpinned by the work undertaken in respect of the Joint Strategic Plan, it follows that it is highly unlikely that the West of Braintree Garden Community element of the Draft Plan is legally compliant (Stebbing Parish Council PSLP 2236) • Objective 1a is supported but the housing requirement has been underestimated and will result in a Plan that does not boost housing as per Government aims; • The Plan as currently worded fails to represent the most appropriate strategy and is not justified or effective as required by the tests of soundness set out within paragraph 182 of the NPPF (2012) (Stonebond Properties PSLP 2708) • Plan fails to address major planning challenges and long-term development hurdles; • Details crucial to the Plan’s viability have been deferred to DPDs; • Major contributory factors that might have a bearing on numbers and siting have been ignored; • There is no short term or medium term indication on the stress on existing services in adjacent villages and towns; • Proposed three new Communities is unrealistically ambitious; • There is little or no actual plan where necessary or essential infrastructure has been identified; • The plan does not have a strategy to meet other objectively assessed development needs; • A clear and measurable direction has not been presented for transport, air quality and open space provision; and • Issues not addressed in a rigorous and objective process due to lack of appropriate evidence at all levels.(PSLP 2591) • The plan is unfit for purpose (PSLP 1796) • The proposed local plan, particularly the large towns proposed, will not be deliverable over the plan period and the plan has totally disregarded developments in neighbouring South Cambs. (PSLP 2020) • The plan as proposed is not the most appropriate strategy when taken in the context of other options and fundamentally lacking in an objective evidence base; • The housing target is unnecessarily high as the Stansted which was the driver of the growth reached saturation point some time ago; • Unjustifiable site selection as the North Uttlesford new town will be developed on hillside which is at odds with all surrounding development. (PSLP2019) • Central Saffron Walden is still an AQMA and pollution levels are still above the legal limit we are extremely disappointed that no AQA or traffic assessment for Saffron Walden has been prepared in relation to the Regulation 19 draft. It is therefore impossible for UDC to come to a conclusion as to whether or not development in Saffron Walden is sustainable in the absence of this evidence base.(Saffron Walden Town Council PSLP 2319) • House price and average earnings data in the Plan is inconsistent with data in the UDC Housing Strategy (which is a background document and
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	<p>evidence base for the Plan). The affordability of housing is hugely over-estimated by the Plan. Development based on affordability levels that don't exist is unsustainable (Saffron Walden Town Council PSLP 2317)</p> <ul style="list-style-type: none"> • It is not justified on the basis of the background to the Plan. It is not likely to be effective; in particular, there are serious questions about whether the strategy is deliverable. Finally, we consider that it is not consistent with national policy in that it will not bring about sustainable development. In particular, the strategy of the emerging Local Plan is not necessarily sustainable, in terms of the amount of land required for the garden communities, which are likely to be developed at relatively low density, and the extent to which these new communities might have to rely even in the longer term on jobs, facilities and services in existing settlements or at the District's main employer of Stansted Airport. (PSLP 2279) • A new town at Easton Park as set out in SP6 is not consistent with NPPF in terms of sustainability due to loss of productive agricultural land, cause traffic congestion on A120, B1256 and M11; lack of infrastructure; additional housing at Easton Park will harm Great Dunmow's identity; new residents will be commuting to London, insufficient job opportunities at Stansted Airport to service three new settlements; not sound to build housing next to an airport; and • It has totally ignored previous decisions of its own (Uttlesford District Council) planning team, the local town Council at Great Dunmow and the surrounding parish councils. (PSLP 2558) • The sustainability assessment is unsound for the same reasons as the inspector Roger Clews found with BDC's plan. At the core is that the UDC spatial vision is sparing in its clarity and context. (PSLP 824) • The majority of the population in Uttlesford lives in villages and there is no need to build a town to house 20,000 – 30,000 people. People will use cars to go to work; • The need for a new town at Easton Park is unsubstantiated. No jobs, no station, wrong type of housing recommendation for the predicted future population, encourages car use as there is no affordable parking at the nearest station at Stansted Airport, poor proximity (approximately 10 miles straight line distance) to the two nearest A&E departments will place unnecessary increased pressure on The East of England Ambulance service. (PSLP 757) • The UDC decision to locate the bulk of new housing to 'Garden Communities' is fundamentally flawed in that it is totally out of keeping with the essentially rural and dispersed nature of the district; • The UDC plan requires high density housing to be sited in areas which have no pre-existing infrastructure of any sort, have no pre-existing employment prospects and whose entire economic raison d'etre is based upon the discredited idea of dormitory commuting towns; • UDC have not demonstrated that placing the bulk of the future housing in Garden Communities is sound compared to the obvious alternative of extending the existing large conurbations of Walden, Stansted and Dunmow; • In addition to the obvious transport and other infrastructure (esp water and sewerage) flaws the proposed WBGC would result in the loss of some of the best and most versatile Grade 2 agricultural land in the region; and • There will be a thoroughly negative impact on existing wildlife through
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	<p>increased pollution (noise, air and light) and the loss of sensitive ecosystems that support protected woodlands, flora and fauna. Specifically, there would be a seriously detrimental effect on Boxted Wood (which is an ancient woodland) directly contravening the latest Government White paper on the topic. (PSLP 722)</p> <ul style="list-style-type: none"> • The plan is not demonstrably the most sustainable option. The housing numbers are inconsistent and based on questionable criteria. The level of transport planning is insufficient to assess whether the transport network will be capable of supporting the additional traffic load implied by the spatial strategy. Sustainable transport links are suggested but not properly defined and costed. Junction improvements in neighbouring districts are outlined but not scheduled or costed. There is no cumulative assessment of the air quality impact of additional traffic within the district or neighbouring districts. The infrastructure plan is not sufficiently costed or scheduled to determine the financial viability of the plan. The proposed delivery methodology for the new settlements is unproven. The capture of land value for the public good has not been secured (PSLP 693) • Para 2.10 seems to justify the Plan against the "London Stansted Cambridge Corridor economic growth area". The LSCC is not, as far as I am aware, an entity that is formally recognised by Government or the Uttlesford electorate. Rather, it is a pressure group primarily driven by Stansted Airport. Given that the LSCC has no standing in Local Planning matters, its mention here is inappropriate and, if anything, implies bias towards the aspirations of Stansted Airport without full and proper consideration. Para 2.13 states that house prices have increased by 21% since 2011 but this is meaningless unless put into context. After the Government announced potential extra runways at Stansted Airport in 2002, Uttlesford house prices declined noticeably against average Essex prices, especially for detached or semi-detached houses. That decline almost certainly started to reverse soon after BAA dropped its planning application for a second runway in May 2010.(PSLP 640) • Spatial Objectives Theme 1: we fully support the proposed sustainable travel modes; however, facilitating the provision of sustainable smart travel solutions will entail creating non-motorised user paths along with the provision of rapid public transport etc. and it is vital that all new off-road paths should be accessible to all vulnerable road users namely walkers, cyclists, equestrians and the disabled. Whilst these spatial objectives are necessarily written broadly, such intentions should be embedded from the Vision and Objectives so that they cascade down throughout the whole Plan.(Flich Way Action Group PSLP 636) • The Spatial Vision sets out at para's 4 and 5 aspirations as to what new developments/new housing will be like, but does not say anything about protection of existing housing, compatibility with the scale, appearance and materials of surrounding buildings, or minimising the impact of such developments on neighbouring properties by appropriate mitigating measures.(PSLP 422) • Spatial Objectives Theme 1: The Plan is unsound as all such new off-road paths must be accessible to ALL non-motorised users, including equestrians, rather than the default option which tends to only cater for pedestrians and cyclists. Whilst these spatial objectives are necessarily written broadly, such intentions should be embedded from the Vision and Objectives so that they cascade down throughout the whole Plan.(PSLP
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	<p>397 & PSLP 788)</p> <ul style="list-style-type: none"> • Section 2.19, Theme 1, Objective 1a - Meeting the Need for New Homes. There is a reference to ‘people with specific accommodation needs’. Clarity is required as to whether, for example, key workers and the elderly are included within this description. (Elsenham Parish Council PSLP 79) • The proposal for three garden communities presents a risk to housing delivery and therefore is not effective. A delay in the delivery of one of the garden communities will have significant implications for delivery rates and the associated five year housing land supply. (Bloomhall PSLP 179) • There is no mention of the lack of green space of any description, other than agricultural land as a significant lack of sports provision, formal green space, informal green space and access to green areas generally when compared with comparable districts or national standard; • Draft Spatial Vision makes no reference to the need to increase green space and that it should be amended specifically to refer to achieving this as part of the vision; and • Support many aspects of the Spatial Vision but it does not appear to be followed by the detailed policies – so, for example: <ul style="list-style-type: none"> ○ it refers to making existing settlements clean and safe places to live, but it fails to take any action to assist Saffron Walden’s unlawful air pollution levels (and in fact the detailed policies will do directly the opposite in some cases, by forcing many more vehicles through the AQMA); ○ it refers to making Uttlesford a healthy place to live, but the Infrastructure policies later have no requirement to provide anything beyond a fraction of the national guidelines for green space or sports facilities, and there are no obvious strategies to deliver this objective; ○ it refers to there being sustainable alternatives to car use, but the Plan fails to provide for any, and there is no Infrastructure Plan or Sustainable Transport Plan to provide for any either; ○ subsequent policies provide that all new developments should be linked to facilities by high quality footpaths and cycle paths, but none of the developments which have already been approved anywhere in Uttlesford satisfy this criteria, and we are not aware that any of the ones proposed will satisfy it either. • Objective 1d sets out an objective to provide proper infrastructure with new developments, but the detailed Infrastructure policies completely fail to do so. The same applies to Objective 3a given the lack of spatial policies and infrastructure policies to achieve any improvement. .” (We AreResidents.org PSLP 2210) • The total number of homes in the West of Braintree Garden Community is not yet an absolute number as set out in this text. (Braintree District Council 2045) • Spatial Vision bullet 3 is welcome as well as Spatial vision - welcome bullet point 3 and reference to conservation and enhancement of the historic environment.(Historic England PSLP 1823) • The housing developments proposed are unacceptable, exceed those required by national policy, are not accompanied by the necessary new infrastructure, contain no requirement for affordable housing content, contain no requirement for environmental control and omit a requirement for new or retention of green spaces. (PSLP 1790) • Description of area in Spatial Vision is contradicted by proposals to
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	<p>develop housing estates whilst decimating wildlife. Also ageing population points to need of affordable home for young people. Proposed development will increase car usage. Proposals will lead to the destruction of a 'distinct rural character'. (PSLP 41)</p> <ul style="list-style-type: none"> • Contradictions in Vision as:- <ul style="list-style-type: none"> ○ Objective 2B) Supporting Market towns but 2 garden communities near Easton, Gt Dunmow and Braintree will adversely impact on existing towns; ○ Objective 3A) Safe guarding Uttlesford distinctive character – creation of 10,000 homes will turn Easton and Gt Dunmow into suburbs of the new settlement ruining the setting, history and semi-rural quality in existing settlements. (PSLP 30)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Objective 1b Protecting and Supporting Rural Communities to be amended - specifically reference the role and importance of new housing in supporting villages and communities around the district throughout the plan period; (Landhold Capital Ltd PSLP2992) • Amend ratio of housing affordability to a ratio of 18 times the average income as well as amend associated policies accordingly; (Saffron Walden and Little Walden Neighbourhood Plan PSLP 2938). • Reword the Spatial Vision to highlight the important role that all of Uttlesford's most sustainable settlements can play in delivering new development; • Stansted Mountfitchet to be reclassified as a Local Centre; • The Spatial Vision Point 4 should be amended to read: "New development will be focused on the towns, local centres and larger villages where opportunities exist to deliver sustainable development which maximises opportunities for sustainable travel. New Garden Communities will also play a role, having been rigorously evidenced and planned. Development of all types across the District will be exemplars of 21st Century living providing well designed homes, high quality employment, services and facilities to meet the needs of residents and businesses. Uttlesford's communities will support a high quality of life for all and create healthy, safe and vibrant places for living and working." • A further bullet should be included along the lines of: "The housing needs of the District will have been met in full and in a timely fashion. Housing delivery will have kept pace with planned requirements through the life of the Plan and in line with the requirements of the Housing Delivery Test. This will have stabilised housing affordability and will have widened choices and opportunity in the housing market. A significant proportion of affordable housing will have also been delivered in the locations where it is needed. Uttlesford's communities will have benefitted, with the viability and vitality of their shops, services, clubs and community facilities having been strengthened. Businesses will have benefitted, with a larger workforce living locally." (Martin Grant Homes & Bloor Homes PSLP2880) • Reference to the West of Braintree Garden Community (WoBGC) should be deleted from all parts of the Plan as the Uttlesford proposed extension is wholly dependent upon the Braintree proposals (Bloor Homes Eastern PSLP 896). • In order to adequately reflect national planning policy objectives, point 6 of the spatial vision should be amended to reflect the 'three dimensions to sustainable development', specifically:

	<p>“London Stansted Airport will form a pivotal part of the highly successful London Stansted Cambridge Corridor; the social and economic benefits arising from London Stansted Airport will be harnessed and the environmental impact of London Stansted Airport will be effectively managed”;</p> <ul style="list-style-type: none"> • Objective 2c, first bullet: To provide clarity and ensure consistency with national aviation policy (Beyond the Horizon – The future of UK aviation: Making best use of existing runways, June 2018), it would be appropriate to amend the aim to read: “To accommodate development by: Making best use of Utilising the permitted capacity of the existing runway, and provide for the maximum number of connecting journeys by air passengers and workers to be made by public transport;” and • Objective 2c, second bullet: It would be appropriate to amend the aim to read: “Ensuring, through partnership working with Highways England, Essex County Council, Network Rail and public transport operators, that the cumulative effect of airport and all other planned development within the District is considered so that appropriate surface access infrastructure and service capacity will be provided without impacting on capacity to meet the demands of other network users.” (Manchester Airports Group (MAG) PSLP 1471) • Change the Objective 3b to include the following additional point: • “Encourage new developments to incorporate green infrastructure in its design and long term management.” (Essex County Council PSLP 872) • Change paragraph 4 of The Spatial Vision to include the following sentence: “The new communities will be designed to support sustainable travel within and outside the community to the wider area”. (Essex County Council PSLP 870) • Remove all references to the ‘London Stansted Cambridge Corridor’ so that the Local Plan is not adopting biased terminology that favours a group of commercial lobbyists; • Reduce the projected figures for housing growth. (PSLP 2050) • The Uttlesford Draft Local Plan can be made legally compliant by the deletion of references within the Spatial Vision and Objectives to the West of Braintree Garden Community; and • The Spatial Vision should be amended as follows: “New development will be focused on the towns and larger villages with three new garden communities being built within the District. West of Braintree – jointly planned with Braintree District Council; Easton Park, and North Uttlesford Garden Communities. These new garden communities will be exemplars of 21st Century living providing well designed homes, high quality employment, services and facilities to meet the needs of residents and businesses. The new communities will be designed to support a high quality of life for all and create healthy, safe and vibrant places for living and working” (Stebbing Parish Council PSLP 2236) • The Spatial Objectives, and Objective 1b Protecting and Supporting Rural Communities should be amended to specifically reference the role and importance of new housing in supporting villages and communities
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	<p>around the district throughout the coming plan period. Such an approach would be entirely consistent with paragraph 55 of the NPPF (2012). (Stonebond Properties PSLP 2708)</p> <ul style="list-style-type: none"> • Paragraph 2.8 – reference to “remnant” should be removed (National Trust PSLP 2495) • Change sought: redrafting of part 1 of the policy to read: “The majority of development will be focused at the towns of Saffron Walden and Great Dunmow and the new Garden Community at Easton Park”.(PSLP 2279) • The evidence suggests the Uttlesford District needs new affordable housing (10% is the minimum quota from the NPPF) and singleton homes (30% as the population ages and lives alone) as well as modest family homes shared amongst the villages that make up the rural character of Uttlesford. Others should be allowed to build their own homes as the New framework suggests either as individuals or as a co-operative.(PSLP757) • The housing numbers must be independently reviewed to confirm their validity. A full transport assessment must be carried out including all major road junctions within the district. Any road junction improvements must be defined, costed and scheduled. The proposed sustainable transport links must be properly defined, costed and scheduled. A full assessment of air quality impact must be carried out within the district and neighbouring districts. The spatial strategy should be reviewed in the light of the transport and air quality assessments and site selections should be modified if traffic levels cannot be supported in the relevant areas. The overall infrastructure plan must be properly defined, scheduled and costed and sources of funding identified. Where land value capture is required to fund these plans, then the method of achieving this must be secured. A proven methodology must be defined and agreed for delivery of the proposed new settlements. (PSLP 693) • Withdraw all references to London Stansted Cambridge Corridor unless such mention clarifies that body's objectives, membership and relevance to planning matters; • Qualify the statement in para 2.13 (PSLP 640). • Provision of multi-user routes with accessibility for all vulnerable road users – pedestrians, cyclists, equestrians and the disabled – is the default where provision for non- motorised routes is planned within or around any new developments; and • Linking of the Flitch Way where the route is planned to run via the existing and proposed developments around the southern part of Great Dunmow. Its inclusion in the Local Plan would go far to addressing issues of soundness and sustainability.(Flitch Way Action Group PSLP 636) • Amend Paragraph 5 of the Spatial Vision by inserting after the first sentence the following: "It will have been designed and constructed in a manner which minimises the environmental impact on neighbouring properties by use of appropriate mitigating measures." (PSLP 422) • Multi-user routes and full accessibility for all vulnerable road users – pedestrians, cyclists, equestrians and the disabled – is the default where provision for them is planned within any new developments.(PSLP 397 & PSLP 788) • Clarify whether key workers and the elderly are included within the description of 'people with specific accommodation needs' as stated in Section 2.19, Theme 1, Objective 1a (Elsenham Parish Council PSLP 79)
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	<ul style="list-style-type: none"> • Point four of The Spatial Vision should be reworded as follows: New development will be focused on the towns and larger villages within and bordering the district with three new garden communities being built within the District. West of Braintree – jointly planned with Braintree District Council; Easton Park, and North Uttlesford Garden Communities. These new garden communities will be exemplars of 21st Century living providing well designed homes, high quality employment, services and facilities to meet the needs of residents and businesses. The new communities will be designed to support a high quality of life for all and create healthy, safe and vibrant places for living and working. (Bloomhall PSLP 179) • Reinstatement of a paragraph noting Uttlesford’s carbon footprint and current unsustainability; • Set out the baseline position in Chapter 2 so that planning decisions can be influenced by the current deficits. Paragraphs covering both of these issues should therefore also be included, together with proposals as to how the existing deficiencies will be remedied; • There is a need to compare the detailed policies against the Spatial Vision and amend the detailed policies to reflect the Spatial Vision or to amend the Spatial Vision to reflect what the Plan policies actually provide. Given that the Spatial Vision would appear to present a more sustainable set of proposals than the detailed policies in fact do, we believe that the Plan policies, including the site allocations, should be amended to reflect the Spatial Vision; • We note Objective 2c, but are not aware of any evidence to support this objective, or to show that such expansion can be achieved sustainably. Unless such evidence can be provided, the objective should be deleted. • Paragraph 2.16 is incorrect. The wording of the paragraph needs to be updated to reflect the fact that “the AQMA is a 1.5km diameter circle around the town centre that includes the major air quality problem areas.” (We Are Residents.org PSLP 2210) • The exact number of homes on the site will be refined through the specific Development Plan Document (DPD) and master planning on the site. As such Braintree would recommend that the number in paragraph 3.32 and where it is repeated in the document (including paragraph 3.102) is amended to a range, as it is set out in policy SP8. (Braintree District Council 2045) • Objectives - Theme 3 : Change heritage to historic environment. (Historic England PSLP 1823) • Severely reduce the number of new houses; • Include the infrastructure measures required to support the population increases proposed and those already permitted; and • Include environmental control measures especially with reference to Stansted airport (Night flights, use of existing maximum capacity (PSLP 1790)) • The Spatial Objectives, and Objective 1b Protecting and Supporting Rural Communities should be amended to specifically reference the role and importance of new housing in supporting villages and communities around the district throughout the coming plan period. (Landhold Capital PSLP 1283) • The numbers of houses proposed is preposterous and needs to be
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	<p>significantly reduced (PSLP 41)</p> <ul style="list-style-type: none"> • An appropriate amount of land around Easton and Great Dunmow would be established as a national park insulating these communities from becoming just a suburb of the new city and part of the concrete corridor being created (PSLP 30) • Easton Park is not a suitable location because it is close to a major and flight paths with health hazards well documented, single ownership puts too much power into one owner and Great Dunmow scheduled for major development cannot cope with another major development nearby. (PSLP 17) • No development of garden communities until critical infrastructure is in place; and • Remove Easton Park from Local Plan as it is an unsuitable location for a new town of 10,000 houses (PSLP 2558)
3. Spatial Strategy	
SUPPORT	11
OBJECT	55
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Support identification of Newport and Thaxted as Key Villages (Countryside Properties PSLP 2762) • Support the identification of Elsenham as a ‘Key Village’. The village is considered to be a wholly sustainable settlement, and it plays an important role in servicing its surrounding hinterland. New development in the village will help to support its existing services and facilities and further boost economic prosperity.(The Crown Estate PSLP 2742) • It is noted that the latest SHMA (2017) has been used to identify the housing requirement in the Pre-submission Local Plan, which has been endorsed in a joint MOU signed in March 2017 by East Hertfordshire, Epping Forest, Harlow and Uttlesford Council’s; and • This Council also welcomes the Local Plan’s recognition of Harlow’s role as major location for economic growth within the London Stansted and Cambridge Corridor reinforced through the importance of the Harlow Enterprise Zone. Harlow would, however, be willing to continue to work with Uttlesford Council to further quantify the employment land requirement to support strategic housing allocations.(Harlow Council PSLP 2309) • I have read through the spatial strategy document in policy SP2 of the draft local plan, I consider it to be sound and therefore support it.(PSLP 206) • Paragraph 3.24:- Welcome reference to conserving and enhancing the local distinctiveness and historic character of these rural settlements (Historic England PSLP1826)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • The protection of IWM Duxford in terms of its significance as a designated heritage asset and an operational aerodrome are not covered by national policy in sufficient detail nor are there other policies in the proposed plan to cover this.(Imperial War Museums PSLP 3054) • Paragraph 3.33 refers to provision of open spaces but there is no open space allocation in the Appendix Maps. (Saffron Walden & Little Walden Neighbourhood Plan PSLP 2939) • The Regulation 19 document lacks an evidence base as well as lack of “reasonable alternative” proposals.(Newport Parish Council PSLP 2999)

	<ul style="list-style-type: none">• Not clear that all reasonable alternatives have been considered;• Effect of higher delivery rates and higher dwelling numbers leading to need for few Garden Communities not considered;• Absence of alternative scenarios that would meet the OAN means that it is not clear that all reasonable alternatives have been considered or that the strategy has been properly justified;• The Council considered only sites submitted to them and did not undertake a holistic review of their district to identify the locations that are most appropriate, having regard to landscape and environmental capacity and transport assessments;• It is not clear that the strategy can be properly justified until further detailed assessments are undertaken to understand the ability to mitigate the significant challenges identified in the SA associated with water quality and heritage conservation;• It has not yet been demonstrated that the Garden Communities allocations – either for the Local Plan period or in full – are deliverable, that their impacts can be properly mitigated, or that the assumptions surrounding self-containment are achievable;• It is not yet clear that the spatial strategy can effectively meet the housing need arising from Uttlesford rather than that from South Cambridgeshire;• The spatial strategy is heavily reliant on Garden Communities to meet the District’s housing need, however their deliverability – over the plan period and in full – does not yet appear to have been proven.• A detailed review of the IDP that does not identify definitive timings or thresholds for the delivery of infrastructure. (The phrase “it will be for the masterplan process to establish when [x] will be delivered” is used frequently). It is therefore not yet clear how the Viability Study can be relied upon to evidence the viability – and therefore the deliverability – of the Garden Communities.• In reference to NUGC, there is no indication that the impact of the full 5,000 allocation has been assessed over its proposed build-out time by the transport studies;• The Local Plan identifies no minimum or targeted quanta of development to be delivered at the Garden Communities except for housing. Without assurances over the delivery of employment floorspace and social infrastructure at the Garden Communities, it is not clear how the modal shift necessary to secure the self-containment sought at the Garden Communities;• It is yet not clear that the R19 LP modal split for NUGC is deliverable.• It does not appear that the spatial strategy has taken account of Wellcome’s plans to provide 1,500 homes as part of its expansion.• Inspection of the Uttlesford Strategy Flood Risk Assessment (2016) suggests that the full NUGC site allocation area was not assessed at the time that the district-wide flood risk assessment was undertaken. (Quod Ltd PSLP 1532)
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	<ul style="list-style-type: none"> • The Presumption of no development Outside the Development Limit is too fierce. In general there were more dwellings in our rural landscape historically than there are today. (PSLP 2934) • Paragraph 3.100 envisages the main route out of the Chesterford New Village/Town to be the A11 and minimising impact on the A505; and • Paragraph 3.101 says dualling the A505 and making the M11 Junction 9 two way to occur after 17 years. These are both unrealistic. All the above need to be done in the first 5 years of the development. (PSLP 2932) • Paragraph 3.48 makes no mention of improving Junction 9 of the M11, which is vital if development adjacent to Chesterford and at the Genome Centre is to proceed. (PSLP 2930) • Paragraph 3.39 says Type B villages should have 'No new allocations for housing development and yet paragraph 3.65 talks of 'windfall sites' will continue to be permitted for up to 70 dwellings per year and SP2 gives criteria for development in Type B villages. (PSLP 2929) • Paragraph 3.33 addresses the 315 dwellings to be built in Saffron Walden but without detail. (PSLP 2928) • No clear and logical explanation on how the OAN figure used in the Plan has been determined; • Adoption of the Plan implies considerable growth in passenger car numbers, major infrastructure requirement and 'quality of life' ramifications; • Sustainability Appraisal regarded as 'woolly in nature'; • No mitigation measures or recommendations are proposed or have been throughout the plan-making process; • Highly debatable if a council of UDC's calibre and size could achieve successful delivery of the Local Plan over the period. (PSLP2651) • Objection to the plan as a whole but the site for the North Uttlesford Garden Community has limitations and constraints on accessibility (Abington Park Farm PSLP 876) • Uttlesford's belated attempt at working with South Cambridgeshire is too little to have had a meaningful impact on the Plan (and is thereby inevitably starting from a flawed position); • Para 6. P51: Uttlesford District Council has not achieved any of this (transport measures) in existing settlements, so why should it suddenly be transformed in the new Garden Communities – this is in contrast with Cambridge/South Cambridgeshire (Wendens Ambo Parish Council PSLP 2428). • It is not Positively Prepared in that it fails to address development and infrastructure requirements with respect to the New Garden Communities. • It is not Effective in that the plan proposals are not deliverable over its period. • The detailed reasons for the above assertions are as follows: -
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	<ul style="list-style-type: none"> • Inspector Mr Roger Clews who is carrying out the Inspection of the Braintree, Colchester and Tendring Plan has found that the proposed West of Braintree New Community is not deliverable primarily because the financial plan is not viable. In that approximately 15% of the UDC plan relies on this joint community then at this time the housing numbers required in the UDC Plan cannot be delivered in the plan period. • UDC has failed to consider altogether the financial viability of its plan; hence the financial viability of the proposed New Communities at North Uttlesford and Easton Park cannot be demonstrated to be financially viable. • Braintree, Colchester and Tendring had planned to commence the construction of 3 New Garden Communities in their overall administrations. The UDC Plan looks to 2 – 3 New Garden Communities in our single administration. Mr Clews considers that the less ambitious plans of the 3 administrations are over-ambitious and not deliverable, hence by comparison, the UDC ambitions cannot logically be considered deliverable. I would however suggest that by the formation of Development Corporations under new regulations laid down this year, viability could be achieved. UDC however has presented no such plans. • Mr Clews further commented that Braintree, Colchester and Tendring had deferred too much of the detail into the future Development Plan Documents (DPDs). This UDC plan has deferred EVERY detail of the New Communities into the future DPDs and so again by comparison and hence the UDC Pan must be considered unsound. • The inspection of the West of Braintree plan found that it is short of a deliverable road strategy. This is also a significant part of the UDC Plan and so will also make the UDC Plan unsound. • In addition to the individual road strategy in e. above, UDC has failed to provide a credible overall road strategy in a number of important areas: - • Two new communities are proposed with total homes of 5,000 and 10,000 both with a single road entry. Such bottlenecks will be unworkable and result in major traffic blockages. • A proposal for a major expansion of Stansted Airport will have major transport implications and yet there has been no integrated consideration of the cumulative effects. Without such a consideration no Plan can be considered sound. • The UDC Plan contains no resolution of the road issues in Saffron Walden Town and the consideration of the continuing illegal level of pollution in the Air Quality Management Area. Ambitious levels of Modal Shift will be required in the proposed New Communities and yet there is no credible consideration of the manner of achievement of this shift. In particular the Braintree, Colchester and Tendring Plan proposes a new Rapid Transport System linking Colchester New Community to Mark Tey Community to West of Braintree New Community and then potentially on to Easton Park New Community and
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	<p>Stansted Airport. It is key for the Modal Shift that this System is implemented (at a probable cost of over £1 Billion). This cost is excluded from the financial consideration of the New Communities and there is no credible evidence for the delivery of the Transport System. (Cllr Lodge PSLP 2396)</p> <ul style="list-style-type: none"> • Technical Note 7 of the District-wide Transport Study by WYG has considered the impact of development in this Plan alongside that already planned by neighbouring authorities, including growth planned by St Edmundsbury Borough Council in Suffolk. An assessment has been made of the impacts on the A1307 – a key route between Haverhill in Suffolk and Cambridge. It shows that the A1307 is already experiencing significant stress in respect of link capacity, and that growth in Uttlesford will contribute additional traffic to these routes. The Greater Cambridge Partnership is coordinating work on the A1307 corridor and Cambridgeshire County Council will seek contributions from development in Uttlesford, as appropriate. (Suffolk County Council PSLP 2382) • Carver Barracks should be a consideration in the Local Plan; • Uttlesford District Council is too small to successfully manage implementation of 3 contemporaneous Garden Communities; • Development of Garden Community at Easton would adversely affect the southern part of the district forever; • Proposed development at Easton Park will require transportation infrastructure; • Compulsory Purchase powers should be used to ensure affordable homes; • Danger of creating an urban sprawl from Stansted Airport to Braintree due to the proximity of Easton Park, West of Braintree Development, Little Easton and Dunmow. • Loss of heritage and protected areas. (PSLP 1912) • Paragraph 3.123 as written, states that "London Stansted Airport, as London's third airport, puts significant pressure for development on the surrounding countryside". However, this wording does not reflect that the airport company and its operation of the airport do not place pressure on the surrounding countryside. Currently, the text is misleading and the Council should clarify therefore what pressure for development the CPZ is attempting to protect against. (Manchester Airports Group (MAG) PSLP 1518) • The Green Belt Review fails to fulfil its purpose in only considering large tracts of land, within which there are many varied landscape characters and different types of land. The Green Belt Review, and thus the draft Local Plan, has failed to properly assess the potential contribution that the Site can make to meeting housing need. (Trustees of N Streeter Will Trust - John's Fund PSLP2856) • Paragraph 3.80 of the plan states that delivery of the Garden Communities will commence in 2022/23. However, it should be made clear that this is
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	<p>an estimated date, and in any event, the Housing Trajectory indicates that West of Braintree will not commence until 2025/26 so the statement is misleading.(Land Securities PSLP 2616)</p> <ul style="list-style-type: none"> • Insufficient community involvement and any representations by the local community have been ignored; • The Plan has an insufficient Sustainability Appraisal as policies do not reflect realistic social, economic and environmental factors, and many policies such as on Air Quality or Sports provision are missing; and • There is a significant lack of evidence and the methodology employed to produce evidence is often flawed, such as in producing the number of houses required; and • The Plan is incomplete and not based on sound evidence. (PSLP 2192) • Housing numbers are 2,700 too high; • Methodology for arriving at housing target of 14,000 is obscure; • Housing densities are too high for a rural area; • Unlikely to achieve a build rate that would maintain a five year land supply; and • Section 106 agreements are not working in Uttlesford (PSLP 2180) • Little technology being leveraged in the plan only token references to electric vehicles and broadband (PSLP 1117) • The fact that West Of Braintree has been under the microscope of one Government Inspector already and has been shown to be unsound Mr Clews Letters 8th June 2018 and 2nd August Would indicate that West Of Braintree in the UDC local plan would also be shown to be unsound; • UDC has shown no signs of cooperating with the communities or other councils.(PSLP 263) • Proposed housing number too high for Uttlesford; and • No evidence of cooperation with South Cambridgeshire District Council (SCDC), which borders proposed North Uttlesford Garden Community (NUGC) (PSLP 257). • It is principally with regard to transport that this plan is non-compliant. The most sustainable, least polluting form of transport is the railway network, but this is ignored in this plan. Getting the railways right must be at the heart of a sustainable transport policy. In failing to do so, I believe this plan is unsound. (PSLP 137) • This plan and the council are not being proactive in strategies to mitigate and adapt to climate change, and the plan has not been developed in line with the Climate Change Act 2008;and • The plan does not acknowledge targets or sets priorities for developers (PSLP 125) • All access from the 3 proposed developments will be onto the A120 and the road is already at capacity.(PSLP 42) • Paragraph 3.48 promotes the growth tourism, including Hatfield Forest National Nature Reserve. In response to the Regulation 18 consultation
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	<p>the National Trust objected to the reference to Hatfield Forest in this paragraph. As previously requested, the National Trust requests that reference to Hatfield Forest is moved to the following bullet point which is concerned with protection of the environment, rather than promoting growth and capitalising on the Forest.(National Trust PSLP 2496)</p> <ul style="list-style-type: none"> • Paragraphs 3.56 – 3.62:- The formulae used to forecast housing requirement is flawed as it based on years of exceptionally high housing growth, historic low interest rates and record high migration but trend has changed; • Paragraphs 3.60 – 3.61:-The Plan overstates the need for homes and does not address requirements for communal residential establishments; • Paragraphs 3.99:- The impact of the NUGC has been based upon assumptions which are not backed up by evidence and in the absence of any planned future increases of public transport provision, and in light of the distance of the settlement from any other employment or services centre, there is no evidence base for the statement “with trips by active modes and public transport making up 60% of all trips” and it should be withdrawn as statistically unsound. (Saffron Walden Town Council PSLP 2320) • Paragraphs 3.33:- “New [...] open spaces will be provided”. This is not backed up by any open space allocation in the Appendix Maps, therefore the Plan fails the NPPF to allocate appropriate sites to satisfy this need. (Saffron Walden Town Council PSLP 2318) • The report of the NEA Inspector leads us to conclude even more strongly that the satisfactory remedy for the scale and distribution of housing development which would enable housing requirements would be considering level of development in villages. (Eclipse Planning Services PSLP 2280) • The proposed plan does not meet the conditions laid down by the National Planning Practice Guidance regarding flood risk, landscape impact, conservation of heritage and the amenity impact on existing and potential inhabitants of the surrounding area and within the proposed local plan.(PSLP 2121) • The proposed local plan does not adequately explain how the subsequent issue of increased traffic into Saffron Walden, already suffering from significant congestion and air pollution, will be dealt with.(PSLP 1019) • Increasing housing in Uttlesford will place undue pressure on existing infrastructure that is already busy, this is not limited to roads, parking, school and places. Increased pressure from traffic will lead to a reduced quality of life for residents due to road noise, congestion and reduced air quality.(PSLP 1006) • There is almost no actual information on the delivery of the proposed development, with regards to accountable organisations or individuals actually keeping the extraordinary promises it seems to make regarding NEW facilities, transport and infrastructure;
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	<ul style="list-style-type: none"> • The evidence has been kept in highly fragmented form and there seems to be no audited and consolidated documentation for the figures used in making this plan; • There is insufficient information to base any judgement on the level of efficacy for either the initial 15 year period or the ongoing pain in the area for the following undefined era of growth; and • Given the issues with local flooding, damage to the regional aquifers by the project, the enormous anticipated ebb and flow of commuting, loss of arable land loss of scenery and loss of access to historical sites of great archaeological significance etc. I find it impossible to describe the local plan as sustainable. (PSLP 1004) • Paragraph 3.66 - The housing numbers have been widely questioned by members of the public since their first publication. In particular: <ul style="list-style-type: none"> ○ The proportion of households assigned to Uttlesford by the ORS consultants' report (25.8%) is higher than that by the GLA (21.7%). This represents a difference of c. 2000 but no explanation has been offered ○ The latest population forecasts for Uttlesford are lower than previously stated ○ The policy on inclusion of care home/sheltered housing is unclear and inconsistent; both historically and with neighbouring districts ○ The annual housing requirement has been backdated to periods in the plan when it did not apply ○ Some committed developments have been missed out of the figures <p>These discrepancies cast doubt on the validity of the housing targets in the plan. (PSLP 697)</p> • Very little consideration has been given to traffic volumes, parking facilities at Saffron Walden, Great Chesterford Station and other area where there is already traffic congestion. Science parks and Stansted Airport unlikely to provide enough jobs for people in new settlements. (PSLP 651) • The plan does not address legally binding climate change targets nor is it consistent with National policy with regard to sustainability. (PSLP 650) • Paras 3.44, 3.45, 3.48, 3.52 and 3.55 refer to London Stansted Cambridge Corridor or "Innovation Corridor" without clarifying that this non-statutory, non-elected pressure group is primarily driven by Stansted Airport. It is inappropriate to justify a general Plan based on one view that has not been tested through elections or legislation. (PSLP 641) • The Local Plan KEY DIAGRAM is positively prepared providing a diagrammatic depiction of a sustainable distribution and pattern of planned growth within the District. The Key Diagram is positively prepared to provide delivery of new homes at sustainable locations close to the A120, Stansted and Braintree as well as to the north of the District whilst also maintaining the Metropolitan Green Belt and Countryside Protection
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	<p>Zones to the south west of the District. (PSLP 1996)</p> <ul style="list-style-type: none"> • The Plan fails to identify, in accordance with NPPF para 47, a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements. We consider that there is insufficient evidence to demonstrate that the Council has a successful history of delivering housing through their windfall sites; and • The principle of the Council's proposed Garden Communities is not disputed; however, it is still considered that insufficient lag-time has been projected to allow for infrastructure to be delivered across these Proposed New Settlements in advance of the early phases of the schemes. (Bovis Homes Ltd PSLP 2692) • At no point does the Council appear to have considered whether the Site (Land off Stortford Road, Birchanger O6Bir15) alone could be removed from the Green Belt; hence there is no firm basis for its apparent ignoring of the recommendations of both employment studies. (Birchanger Hall Farms PSLP 2844) • Paragraph 3.44:- As a neighbouring authority, Hertfordshire County Council (HCC) should be included on the list of adjoining local authorities that are identified in this paragraph. (PSLP 2653) • Is the provision for 504 Care Home Spaces sufficient for an ageing population? (Birchanger Parish Council PSLP 2519) • Paragraph 3.59: <ol style="list-style-type: none"> a) The calculations of housing need that use one basis to calculate the total for the four SHMA districts, but a totally different basis to divide it between the districts, are both illogical and implausible; b) The district has experienced one of the very highest housing growth rates so far this century and it is now proposed to make it virtually the fastest growing district over the 22-year plan period. No justification for this is offered; c) A comparison with the housing growth proposed for Epping Forest district is most telling. Despite every government projection showing Epping needing a much higher rate of growth, it is proposed that Uttlesford's should be higher. No justification is offered; d) With new government projections due out in a matter of weeks that are expected to show significantly different figures, the production of the Plan is premature; and e) On the above grounds the Plan fails the soundness test of being justified (PSLP 2324). • Paragraph 3.60: This appears to be a tidying-up exercise as the Inspector did not address the issue regarding the mixing of ORS and GLA-based figures, referred to in my comments on paragraph 3.59. (PSLP 2331). • To be consistent with the other three districts in the SHMA area UDC
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	<p>should withdraw the care home places figure from the housing need calculation. (PSLP 2333).</p> <ul style="list-style-type: none"> • A huge amount of new development is proposed or has already been approved for Great Dunmow; • UDC has repeatedly proposed significant new development for Saffron Walden, despite the obvious east-west traffic and air pollution implications, and the lack of sustainability; • The Saffron Walden transport study shows that Saffron Walden’s road system cannot sustain further significant development, and indeed cannot sustain the level of development already approved; • Given that even greater expansion of Saffron Walden or Great Dunmow is unsustainable, the only alternatives are significant development in the villages or the construction of new settlements. Although we have seen no Comparative Sustainability Appraisal, we can fully understand that significant additional development in any of the existing villages is unsustainable; • On this basis the Spatial Strategy to concentrate the bulk of the new housing requirement, beyond that already approved, in one or more new settlements is the only practicable spatial strategy; • We therefore agree with the Spatial Strategy insofar as it concentrates future new development in one or more new settlements. We also support the adoption of the “Liverpool” methodology which the Council are finally proposing to adopt as provided in para 3.71; • We do not believe that UDC’s reliance on the use of private sector developers to deliver new single site settlements on the scale required by the Council is achievable, certainly not if the TCPA principles are to be followed; • The draft Plan is silent on UDC’s proposals for a SPV (Special Purpose Vehicle, i.e. a council driven Development Corporation) to control its single site settlement(s). The absence of such a proposal, even in outline form, is unprecedented, hard to believe and likely to prove fatal to the draft Plan; • We have seen the Land Securities proposal for Easton Park, which claims that it will comply with Garden City principles 4-10 but not 1-3. Not only does this completely negate the TCPA principles as a whole but it also shows that the Local Plan proposed cannot be delivered since it is explicit that the TCPA principles will not be followed even though the draft Plan claims that they will; • The Spatial Strategy allocations as set out in paragraphs 3.16 to 3.23 are incorrect and inconsistent with the rest of the draft Plan as they ignore the allocations which have already been approved but still form part of the 2011-2033 new home provision; • We disagree with the settlement hierarchy set out in paragraphs 3.12 and following and SP2, as it conflicts with the evidence base and the Spatial Strategy, and it serves no sustainable purpose. Saffron Walden and Great
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	<p>Dunmow are placed at the top of the settlement hierarchy as the two existing towns in the district, but neither can sustainably accommodate significant future development, other than that already approved;</p> <ul style="list-style-type: none"> • Paragraph 3.33 is factually incorrect in that it claims “the town provides good opportunities for further walking and cycling”. There has been a failure to deliver any material additional cycle facilities to Saffron Walden since the latest Cycling Strategy was published and in 2015 both UDC and ECC Highways have rejected all of Saffron Walden Town Council’s proposals for cycle improvements and have since stated that they are not aware of any that can be delivered; • In relation to paragraphs 3.59-3.62, we are greatly concerned about the scale of housing development proposed for Uttlesford, which appears to be proportionally much greater than almost anywhere else in the country, and it is not clear to us that it is justifiable; • Failure to properly account for supply between 2011 and 2017: It seems that in the Regulation 19 draft UDC is using a faulty ‘revisionist model’ to determine housing need. Specifically the model used in this draft of the Plan has assumed that 641 units pa are needed for each year of the Plan, backdated* to 2011; • It is not clear how the overall need numbers have been arrived at – the proportion of new homes assigned to Uttlesford in the ORS report (25.8% of the total in the study area) is significantly greater than that assigned by the GLA in their assessment (21.7%); and • The policy on the inclusion of care home and sheltered housing requirements is unclear and inconsistent, including when compared with other districts, and we believe has led to double- counting of the housing requirements (<i>WeAreResidents.org PSLP 2214</i>) • No transparent process as to how UDC have arrived at the housing distribution and so locations that they are proposing; and there’s no systematic assessment as to why it is more sustainable (i.e. better) than any other distribution, as required by law; • No clarity as to how UDC propose to ensure that community benefits are realised from each of the new settlements; • There is no proper infrastructure plan. Uttlesford residents have been let down time and again over the last 10 years by UDC’s failure to force developers to provide proper infrastructure to support new developments; • There is no sustainable transport plan at all. Given that most residents of the proposed new developments are likely to be commuting out of Uttlesford to work; • Whilst UDC has commissioned a Transport Study on the effect of the new plan on principle link roads in the district, they have not commissioned any assessment of the effect of development on existing towns and villages, where most of the capacity issues are at present; and • UDC has repeatedly refused to commission an Air Quality Assessment to
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	<p>show the effects of new development on air quality, particularly in Saffron Walden, where air pollution has been at illegal levels for most of the last 12 years. (PSLP 2116)</p> <ul style="list-style-type: none">• Any development supported through improvements in rail capacity linked to Crossrail 2 should be explicitly recognised in the Uttlesford Local Plan. (Transport for London PSLP 2114)• Paragraph 3.105:- Historic England would comment that the illustrative masterplan in the HIA currently shows development within the RPG leading to partial loss of this heritage asset and thus harm. We appreciate there is on-going work in relation to the HIA and also the policy wording and so, as yet it is perhaps premature to state that the policy includes appropriate wording to mitigate landscape and heritage impacts (Historic England PSLP 1856).• Notwithstanding our in principle objection to the North Uttlesford Garden Community at Great Chesterford, we offer our comments on paragraph 3.97. Again, we welcome the mention of the HIA and note that the HIA concludes that development of the North Uttlesford site has the potential to harm the significance of heritage assets. Historic England agrees with this conclusion. There is on- going work in relation to the HIA and also the policy wording and so, as yet it is perhaps premature to state that the policy includes appropriate wording to mitigate landscape and heritage impacts. As previously advised, Historic England have serious concerns regarding the suitability of this allocation per se both in terms of impacts on heritage assets and their settings a well as wider historic landscape impacts. .(Historic England PSLP 1853)• Paragraph 3.88:- We welcome the mention of the HIA and note that the HIA concludes that development of the Easton Park site has the potential to harm the significance of heritage assets. Historic England agrees with this conclusion. There is on-going work in relation to the HIA and also the policy wording and so, as yet it is perhaps premature to state that the policy includes appropriate wording to mitigate landscape and heritage impacts. .(Historic England PSLP 1837)• Paragraph 3.25:- Change historic to heritage assets....this is the most commonly used term (see NPPF glossary). Welcome the addition of reference to sites of archaeological interest. Also suggest that Registered Parks and Gardens should be included in this list. (Historic England PSLP 1827)• Paragraph 3.83:- Suggest the addition of a further bullet point to read 'conservation and enhancement of the historic environment' (Historic England PSLP 1830)• Paragraph 3.32:- We note the proposals for three new garden communities in the District at Easton Park, West of Braintree and North Uttlesford. We have previously raised concerns regarding the garden communities. We welcome the additional work that has been undertaken in the production of detailed Heritage Impact Assessments and revised
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	<p>policy wording for these new garden communities. However, there is still on-going work to finalise the HIAs. The outcome of the HIAs will need to inform further revisions of policy wording which we would hope to agree with the Local Planning Authority in a Statement of Common Ground. Notwithstanding this, it is our considered view that whilst there may be scope for some development at Easton Park and West of Braintree, subject to suitable mitigation as identified in the HIAs, we continue to have an in principle objection to the site at North Uttlesford both in terms of the impact on heritage assets and their settings and the broader historic landscape and visual impact of the proposals. (Historic England PSLP 1828)</p> <ul style="list-style-type: none"> • Paragraphs 3.8 – 3.22:- We welcome the inclusion of this section on development of alternative strategies and new settlement site selection. However, Historic England continues to have concerns about the New Settlement site selection process. It is our view that, from the information we have seen, the selection process seems to have been very biased towards access and transport, with comparatively little consideration/weight having been given to the historic environment. For example, in the SA summary table, there is only one brief mention of heritage in relation to Dumnow and no mention of the historic environment in respect of the chosen new settlements. Paragraph 7.4.5 of the Sustainability Appraisal itself considers new garden communities and assesses them against the sustainability objectives including objective 4 in relation to the historic environment. The SA concludes uncertain impacts when in our view it is clear that there would be major significant impacts from the development proposed. The SA plays down the potential impact and is therefore somewhat misleading. In addition, Appendix 4 does not consider the full quantum of development currently being considered for each site (eg only 2,500 dwellings at Great Chesterford). Overall the selection process appears to have been very driven by transport. Whilst we understand that further work is being undertaken to map out the site selection process, this would appear to be retrofitting the evidence for a decision already taken. • It is our considered view that insufficient weight was given to the protection of the historic environment at this stage in the process. The NPPF makes it clear that great weight should be given to the conservation of heritage assets and that significance of a heritage asset can be harmed by development within its setting (paragraph 132 of the old NPPF, paragraph 193 and 194 of the new NPPF). Paragraph 152 of the old NPPF, paragraph 32 of the new NPPF states that in respect of Plan making, significant adverse impacts on any of the dimensions of sustainable development (which includes the historic environment) should be avoided and, wherever possible, alternative options should be pursued. The site selection process led to the selection of new settlement locations at North Uttlesford (Great Chesterford), Easton Park and West of Braintree. Given
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	<p>the very rich historic environment at Great Chesterford and the significance of the inter-relationship between the Roman Temple, Roman Town and Fort together with the very prominent location of the proposed new settlement on the hill above these assets and in their wider setting and on the basis of the current evidence, we consider that a new settlement in this location would cause serious harm to the historic environment. (Historic England PSLP 1825)</p> <ul style="list-style-type: none"> • The Spatial Strategy fails many of its objectives regarding sustainability and transport for the following reasons: <ul style="list-style-type: none"> ○ For Stansted Airport to play a major part in this development plan, it must separate its access to the Coach and Train services and its associated parking requirements from those wishing to access it as an airport. ○ It can be seen from the Key Diagram on page 22, which references the relevant road structures referred to in the document that there is a very important road missing both in the diagram and missing from the grand plan. The B183 unlike the B184 is less able to sustain large volumes of traffic, contains many blind bends and is too narrow in many places large articulated lorries and buses ○ The impact of the Eastern Park development needs to be assessed in relation to the existing over-subscription of the B183. It can only become a major problem without this. ○ This road requires a radical approach for it to sustain the development plan as it stands. • The spatial and transport plans are unsound without any consideration of the impact on this road both for the success of the plan and its impact on the local communities. (PSLP 1930)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Add paragraph at the end of the Spatial Strategy section <i>“Imperial War Museum (IWM) Duxford sits immediately adjacent to the northern boundary of the district within South Cambridgeshire District. The museum is a significant national heritage asset, major visitor attraction, educational and commercial facility which delivers economic, social and environmental benefits to the region including Uttlesford district. The Air Safeguarding Zone at Duxford seeks to protect the future of IWM Duxford by ensuring that all proposals for development within this zone give consideration to the impact on the operation of the airfield. Applications for development within Duxford’s Air safeguarding Zone will be the subject of consultation with the aerodrome operator.</i> The safeguarding zone which extends beyond the district boundary into Uttlesford district should be formally recognised within the development plan by amending the policies map in the Local Plan to include the zone. An additional paragraph at the end of the Spatial Strategy section would cover this. (Imperial War Museums PSLP 3054) • This note has identified a range of apparent deficiencies in the R19 LP evidence base, which if left unanswered would suggest that the soundness of the R19 LP has not yet been demonstrated on a number of bases. It is

	<p>therefore not yet possible to recommend specific modifications to the R19 LP without further information on the matters raised. (Quod Ltd PSLP 1532)</p> <ul style="list-style-type: none"> • Paragraph 3.115 should be amended to read: "outside the Development Limit the general presumption is against development but exceptions may be allowed for single dwellings or 2 or 3 dwellings where some of the Type B village criteria are met and/or some sustainability criteria are not met and/or the proposed dwelling(s) would sit comfortably in the predominantly rural landscape. (PSLP 2934) • Make clear that Junction 9 of the M11 must be made 2 way and the A505 made a dual carriageway within the first 5 years of the Chesterford New Village/Town. (PSLP 2932) • Paragraph 3.39 should be amended to make clear that modest numbers of dwellings may be permitted in Type B villages provided SP2 is taken into account and great attention is paid to design, proportionality and limiting intrusion on neighbours. (PSLP 2929) • Basic guidance on the future road layout of Saffron Walden and where further residential and other development might best be located. (PSLP 2928) • The scheme could address these issues by adopting measures such as: • Internalisation of many movements that would otherwise have to travel off-site i.e. school trips, retail and healthcare. • Improvements at the A11 Stump Cross roundabouts to increase capacity and provide the main vehicular access point for the development site. • Construction of a new access junction onto the B184 that would include pedestrian and cyclist connectivity with Great Chesterford. • New pedestrian/cycle connections linking the site with Chesterford Research Park, Great Chesterford (rail station), Saffron Walden and the Wellcome Trust. • Examine opportunities for a pedestrian/cycle bridge or tunnel to deal with the barrier effect of the A11. • Investment, via S106 agreement funding, in improved facilities for sustainable modes at Great Chesterford Station with respect to out of peak period services. • A new public bus service connecting the Wellcome Genome Campus, Whittlesford Parkway, Granta Park and the site. • A "Northern Gateway" into the site which would promote and prioritise sustainable movement to the site via this location. (The full nature of the gateway is not fixed at present and the scheme proposals describe the type of facilities that might be achievable. These are discussed below in greater detail). • Support for strategic improvements to the A505, or to Junction 9 of the M11. • After completion of the A505 corridor improvements, S106 agreement investment in traffic management and public realm schemes in the villages of Great Chesterford, Ickleton and Hinxton to reduce rat running. • There are a number of ways of delivering the proposal for a Northern Gateway; however, in the view of Abington Park Farm, the North Uttlesford Garden Community should not proceed without the Northern Gateway being secured as an integral part of the proposal (Abington Park Farm PSLP 876)
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	<ul style="list-style-type: none"> • In the absence of clarity as to a precise threat, the general principle of countryside protection set in context of the Government’s aviation policy for making best use of airports could be better reflected by the following change: “London Stansted Airport, as London's third airport, puts Without a proactive planning strategy, making best use of London Stansted Airport, could result in significant pressure for development on the surrounding countryside".(Manchester Airports Group (MAG) PSLP 1518) • A revised and improved Green Belt Review. (Trustees of N Streeeter Will Trust - John's Fund PSLP2856) • It should be made clear that this is an estimated date, and in any event, the Housing Trajectory indicates that West of Braintree will not commence until 2025/26 so the statement is misleading.(Land Securities PSLP 2616) • The evidence base must be properly prepared. All policies should be developed first and properly consulted on, with comments taken into consideration; • The Plan must have details on the significant infrastructure that is required for implementation which requires cross-boundary collaboration. • Policies and DPDs need to be written. • The evidence base needs to be accurate with sound methodology used – for example the numbers arrived at do not take into account changes in population and local growth which are lower than currently stated. • No reasonable alternatives have been considered and need to be.(PSLP 2192) • Adopt Community Infrastructure Levy and abandon section 106 agreements; • Embed sports provision (including land and funding); • Recalculate the housing numbers, using different ‘experts’ and mathematical models; • Reduce the upper limit for housing densities; and • Provide much better definition of what will be expected for the Garden Communities (PSLP 2180) • Reduce the numbers of houses planned. Keep them in the corridor. Improve the M11 and A120 before any houses are built. Do not approve MAG'S application for more capacity. Protect our wildlife by coming up with measures to reduce speeding on country roads (PSLP 42). • Need a detailed effective policing plan or impact of additional crime/social issues on existing communities; and • Settlements should be kept separate so as not to impact on existing towns and villages (PSLP 32) • The impact assessment of the NUGC on the area’s transport infrastructure should be recalculated based on known modes of transport. (Saffron Walden Town Council PSLP 2320) • Increase the numbers allocated to Type A and B villages, including the allocation of land at 6 Walden Road, Swards End (Eclipse Planning Services PSLP 2280) • Delete all references to London Stansted Cambridge Corridor unless such mention clarifies that body's objectives, membership and relevance to planning matters. (PSLP 641) • We would recommend that this garden settlement (Easton Park) is altogether removed from the emerging Local Plan and an increased level
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	<p>of smaller site are allocated to ensure a sufficient housing supply is delivered. (Bovis Homes Ltd PSLP 2692)</p> <ul style="list-style-type: none"> • The conclusions of the LLA Green Belt Assessment (Appendix 1) clearly indicate that the Site (Land off Stortford Road, Birchanger O6Bir15) could be removed from the Green Belt without affecting the purposes and role of the Green Belt. (Birchanger Hall Farms PSLP 2844) • Any development supported through improvements in rail capacity linked to Crossrail 2 should be explicitly recognised in the Uttlesford Local Plan. (Transport for London PSLP 2114) • Paragraph 3.105 should include more detail in relation to heritage assets both on site and in the wider area and discuss appropriate treatment of these assets. This will need to be informed by the findings of the HIA. (Historic England PSLP 1856). • Paragraph 3.97 should include more detail in relation to heritage assets both on site and in the wider area and discuss appropriate treatment of these assets. This will need to be informed by the findings of the HIA. (Historic England PSLP 1853) • Paragraph 3.88 should include more detail in relation to heritage assets both on site and in the wider area and discuss appropriate treatment of these assets. This will need to be informed by the findings of the HIA. (Historic England PSLP 1837) • Paragraph 3.25:- Change historic to heritage assets....this is the most commonly used term (see NPPF glossary). Welcome the addition of reference to sites of archaeological interest. Also suggest that Registered Parks and Gardens should be included in this list. (Historic England PSLP 1827) • Paragraph 3.83:- Suggest the addition of a further bullet point to read 'conservation and enhancement of the historic environment' (Historic England PSLP 1830) • Paragraphs 3.8 – 3.22:- In order to make the Plan sound, it is our view that the decision regarding the location of the new settlements (in particular North Uttlesford Garden Community at Great Chesterford) should be revisited paying closer attention to the impact upon the historic environment and with a view to identifying an alternative location to Great Chesterford that would have a less significant impact upon the historic environment (Historic England PSLP 1825) • If a bye-pass road linking Braintree, Great Dunmow and Harlow cannot be found or developed some modifications to the B183 will be required as a short-term solution; and • In the long-term, the B183 will not be able to sustain the developments and the impact of the traffic needs and access to the M11. A long-term solution remains the best option. (PSLP 1930)
<u>Policy SP1 Presumption in Favour of Sustainable Development</u>	
SUPPORT	3
OBJECT	10
SUMMARY OF REPRESENTATIONS IN SUPPORT	Fully supportive of the inclusion of the policy on the presumption in favour of sustainable development; (Gladman PSLP 2787)
SUMMARY OF	<ul style="list-style-type: none"> • The assessment of housing needs uses an approach to assessing

REPRESENTATIONS IN OBJECTION	<p>demographic trends that is inconsistent with national policy. In addition the market signals uplift fails to reflect the severity of the affordability issues within the HMA and Uttlesford. as well as apply a market signals uplift that insufficiently;</p> <ul style="list-style-type: none"> • Insufficient account has been given to the risks that the Garden Communities will not meet the timetables established in the plan. No buffer has been applied to take account of this risk placing delivery of the requirement in doubt should there be any delays. • The stepped housing target and Liverpool approach to assessing housing land supply are not consistent with national policy which requires backlog to be addressed in the first five years of the plan. • Policy H8 is not effective or consistent with national policy and must be amended to be considered sound; • Requirements with regard to accessible homes in H10 have not been adequately justified and are inconsistent with guidance in PPG; • Implementation of HIAs on developments of over 50 units is ineffective and inconsistent with national policy which places the emphasis on plan makers to ensure the development it proposes supports improvements in health outcomes; • The higher than building regulation standard for broadband provision and minimising CO2 (<i>Persimmon Homes PSLP 2668</i>) • Concern over Council's default position of approving planning applications where there are no relevant policies to the application or relevant policies are out of date at time of decision making; • The request to comment on Sustainability Appraisal is not mentioned in the Plan itself. (<i>Elsenham Parish Council PSLP 259</i>) • Failure of Settlement hierarchy to recognise Braintree and Bishop's Stortford contribution to housing delivery and employment in Uttlesford; • Insufficient discussion has occurred between East Hertfordshire District Council and Uttlesford District Council regarding the potential of fringe sites around Bishop's Stortford to provide sustainable alternative locations for development. (<i>Bloomhall PSLP 182</i>) • Failure to articulate why the land south of Beldams Lane, Bishop's Stortford was not considered for development given its highly sustainable location in walking distance from the train station and the centre of town albeit being located within the Green Belt where it is not adequately fulfilling its functions; • Supporting text to address each area of search and provide justification for rejection or acceptance so as to demonstrate that all alternative locations have been fully considered; • Lack of evidence to demonstrate why areas of search identified in earlier Local Plan versions have been excluded; • Cross boundary discussions need to be noted to demonstrate the plan is justified and that all suitable alternative sites have been duly considered. (<i>Bloomhall PSLP 181</i>)
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	<ul style="list-style-type: none"> • Supporting text (paragraph 3.8) fails to illustrate Council’s full exploration of cross boundary opportunities to deliver sustainable residential growth on the southern side of Bishop's Stortford, with its proximity to the M11 and A120 as required by paragraph 3.11; • Insufficient consideration has been given to the potential cross boundary opportunities with East Hertfordshire District Council to enable the development of the land south of Beldams Lane. (Bloomhall PSLP 180) • Policy is a paraphrase of NPPF paragraph 14 which adds nothing of local distinctiveness to what is already clearly set out in national guidance; • The appraisal of the overarching Policy SP5 and the policies for the three specific proposals do nothing to explain or justify the benefits of the preferred strategy. • The Sustainability Appraisal is deeply flawed in relation to Policy SP2 and other strategic policies in that, it constitutes an ex post facto rationalisation of the preferred strategy and does not show, as is should, how that strategy emerged from a range of plausible alternatives. (Eclipse Planning PSLP 2278) • SA Report authors generally made optimistic assumptions about garden Community benefits and negative assumptions about alternatives without evidence to support assumptions; • Assessments lack the necessary degree of objectivity and are therefore unreliable; • No evidence Rapid Transport System is viable; • It is unlikely that those extremely ambitious targets would be achieved or even approached unless rapid transit services to key destinations are available early on in the lifetime of the Garden Communities; • no evidence that the area can provide the necessary transport infrastructure, water supply, or employment opportunities required to support 20000 extra new homes; • There is no evidence that UDC is capable of delivering 3 GCs in the time scale given (PSLP 723) • The Draft Local Plan is not consistent with the NPPF:- <ul style="list-style-type: none"> i. Uttlesford has one of the 10 largest per capita carbon footprints in Britain, which UDC admit is unsustainable, yet there is no attempt to reduce it, and indeed reference to the problem has been removed from the Regulation 19 Draft. Transport emissions are the single biggest contributor to Uttlesford’s carbon footprint, but there is no sustainable transport strategy; ii. It is not consistent with many of the detailed requirements of the NPPF; iii. It is contradicted by the evidence base; iv. It does not reflect the vision of the local community (Residents for Uttlesford - R4U).
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MODIFICATION REQUEST	<ul style="list-style-type: none"> • Where there are no policies relevant to the application, or relevant policies are out of date at the time of making the decision, planning applications will be refused unless overwhelming reasons can be produced for its acceptance. (Elsenham Parish Council PSLP 259) • The settlement hierarchy in paragraph 3.29 should be amended to read as follows so as to include the fringe towns of Bishop's Stortford and Braintree as areas where development would be supported: <ul style="list-style-type: none"> • Market Towns; • Fringe Towns; • Key Villages; • Type A Villages; and • Type B Villages and Hamlets • A new paragraph and table should be included after paragraph 3.34 to include the Fringe towns of Braintree and Bishop's Stortford. (Bloomhall PSLP 182) • Merge Policy SP1 with Policy SP12, subject to the changes recommended for that policy. (Eclipse Planning PSLP 2278) • Elsenham should be deleted from Key Villages (PSLP 2308)
<u>Policy SP2 The Spatial Strategy 2011-2033</u>	
SUPPORT	276
OBJECT	113
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • 160 respondents; “consider the spatial strategy outlined in policy SP2 of the draft Local Plan to be sound. I therefore support it”. • “No doubt the Council has taken full account of the proceedings at the recent N Essex Strategic Plan Part 1 Examination. In particular the robust scrutiny of the spatial strategy that was undertaken to ensure all reasonable alternatives had been considered and thoroughly tested against the selected strategy. Nevertheless Galliard is fully supportive of the spatial strategy to concentrate future development in the major towns and the garden communities, especially West of Braintree”. Galliard Homes; PSLP777 • Recognises that this is appropriate development and makes a valuable contribution towards the OAN. The plan is positively prepared, effective and justified and broadly consistent with national policy. (The Young Trust; PSLP1610) • Policy SP2 Has been positively prepared (Andrewsfield New Settlement Consort; PSLP1986) • Rosconn Strategic Land (RSL) support the identification of Elsenham as one of the “Key Villages” within the Spatial Strategy. Elsenham is an entirely suitable location to act as a major focus for development in the rural area to accommodate sustainable development and reinforce its role of providing services to the wider rural area, as justified by the supporting evidence base demonstrating the range of existing facilities and characteristics of the settlement and its functional relationship with the surrounding area. This is in accordance with the NPPF. (Rosconn Group ;PSLP2285) • We consider the spatial strategy, involving a combination of new Garden Communities and expansion of existing towns and villages, is the

	<p>appropriate choice of spatial strategy, given the housing requirement and capacity of existing settlements to accommodate growth. (Landsec; PSLP2587)</p> <ul style="list-style-type: none"> • We are broadly supportive of Policy SP2 and the objectives set out within the policy. Policy SP2 states that; Sustainable growth of London Stansted Airport will be supported in principle, subject to conformity with the environment and transport framework set out in Policy SP11 “ London Stansted Airport”. (Legal & General; PSLP2618) • The concept of the new independent Garden Communities deserves support with their location taking advantage of access to the major highways, namely the M11, A120 and A11. The need to be well-designed with the proper allocation of open space with community facilities. (Stansted Mountfitchet Parish Council; PSLP2626) • It is supported that Great Dunmow is identified as an important centre for residents who live in the southern part of the District, which will be the focus of the majority of development. (Bovis Homes; PSLP2690) • Although the Full Council vote on the Local Plan was not a unanimous decision for obvious local reasons, the final proposal for three new GARDEN COMMUNITY DEVELOPMENTS in specific locations is to be applauded. (Local uncertainty about large housing developments affecting villages, which caused serious anxiety for many residents in all Uttlesford's villages and hamlets, has now been assuaged.) 'I THEREFORE FULLY SUPPORT THE SPACIAL STRATEGY AS DETAILED IN THE LOCAL PLAN, AS A SOUND AND ACCEPTABLE SOLUTION FOR FUTURE DEVELOPMENT SCHEMES IN UTTLESFORD DISTRICT COUNCIL'S PARISH AREAS'. (PSLP617) • We consider the spatial strategy, involving a combination of new Garden Communities and expansion of existing towns and villages, is the appropriate choice of spatial strategy, given the housing requirement and capacity of existing settlements to accommodate growth. Additionally we note that due to the lead in time for development to commence at new settlements, the housing trajectory presently shows a reduction and shortfall in housing delivery between 2022/23 to 2027/28. Given the above factors, we consider there may be a requirement for Uttlesford to consider alternative options to ensure early delivery of housing, such as increasing the delivery rates for sites allocated in the Local Plan, or the addition of new allocation(s). (Landsec; PSLP2587) • paragraph 3.24 Welcome reference to conserving and enhancing the local distinctiveness and historic character of these rural settlements. (Historic England; PSLP1826) • The Local Plan KEY DIATRAME is positively prepared providing a diagrammatic depiction of a sustainable distribution and pattern of plan led growth within the District. The Key Diagram is positively prepared to provide delivery of new homes at sustainable locations close to the A120, Stansted and Braintree as well as to the north of the District whilst also maintaining the Metropolitan Green Belt and Countryside Protection Zones to the south west of the District. Andrewsfield New Settlement Consortium (ANSC) supports the identification, through the Key Diagram, of a Garden Community on the border of and within both Uttlesford and Braintree Districts. The Key Diagram accords with the development vision and master plan submitted by ANSC towards the Uttlesford Local Plan Call for Sites in 2015. (Andrewsfield Consortium; PSLP1996) • It is noted that the latest SHMA (2017) has been used to identify the
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	<p>housing requirement in the Pre-submission Local Plan, which has been endorsed in a joint MOU signed in March 2017 by East Hertfordshire, Epping Forest, Harlow and Uttlesford Council's. Employment This Council also welcomes the Local Plan's recognition of Harlow's role as major location for economic growth within the London Stansted and Cambridge Corridor reinforced through the importance of the Harlow Enterprise Zone. Harlow would, however, be willing to continue to work with Uttlesford Council to further quantify the employment land requirement to support strategic housing allocations. (Harlow Council; PSLP2309)</p> <ul style="list-style-type: none"> • The A1307 is a key route between Haverhill in Suffolk and Cambridge. It shows that the A1307 is already experiencing significant stress in respect of link capacity, and that growth in Uttlesford will contribute additional traffic to these routes. This suggests that development in Uttlesford could be asked to contribute to either a specific scheme or a wider strategic scheme that addresses impacts on the A1307 (paragraph 5.4 of WYG Technical Note 7). The Greater Cambridge Partnership is coordinating work on the A1307 corridor and Cambridgeshire County Council will seek contributions from development in Uttlesford, as appropriate. (Suffolk County Council; PSLP2382) • PARAGRAPH 3.36 We support the identification of Elsenham as a "Key Village" The village is considered to be a wholly sustainable settlement, and it plays an important role in servicing its surrounding hinterland. New development in the village will help to support its existing services and facilities and further boost economic prosperity. (Savills; PSLP2742) • Overall CCC is supportive of this approach to housing provision in the UDC Local Plan and do not raise any objections under soundness or legal compliance. Overall CCC is supportive of the approach to employment in the UDC Local Plan and do not raise any objections under soundness or legal compliance. Although CC support the spatial strategy, in the light of the Inspector's Report into the North Essex Authorities Strategic (Section 1) Plan, UDC will need to be satisfied that the West of Braintree garden community allocation is deliverable (Chelmsford City Council; PSLP1760) • For these reasons the landowner is strongly of the view that the provisions in respect of draft Policy SP2 Hierarchy have been positively prepared and are effective in these respects as they are based on a strategy which seeks to meet such objectively assessed development and associated infrastructure requirements and are deliverable during the Plan period. This also clearly demonstrates that such an approach is justified in this regard as the most appropriate strategy when considered against the reasonable alternatives as based on proportionate evidence. (Landvest; PSLP1619) •
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • It talks of maintaining the Distinctive character of Uttlesford. 25,000 additional households would change the character forever. 10,000 of these on an ancient deer park will destroy the historic setting of Little Easton and Dunmow. The density of modern developments and the carbon copy style of houses will spoil the character of this rural part of Essex. (PSLP21) • The settlement hierarchy fails to take account of the opportunities for sustainable development on the edge of Braintree and Bishop's Stortford (the fringe towns) therefore the effectiveness of the plan and its ability to deliver the required housing is questionable due to the over reliance on

	<p>the three new settlements to deliver late in the plan period. (Bloomhill; PSLP183)</p> <ul style="list-style-type: none"> • The Council have clearly not sought to address meeting housing need now, in the next 5 years, as per the PPG. (Bloomhill; PSLP196) • It is taken as given that the key villages are as defined in Table 1, Section 3.36. But no justification is offered for the classification. As pointed out by various respondents to the Autumn 2015 consultation and the Regulation 18 consultation, there is an overwhelming case for the inclusion of Felsted as a “key village”. (PSLP201) • This does not equate to protecting the rural nature of the district. The only significant employment growth identified within north Uttlesford is at Chesterford Research Park. (PSLP306) • Road and rail transport facilities will not cope with addition homes. Motorists already rat-running through villages to avoid getting trapped in traffic (PSLP306) • The allocation of 40 houses in Rush Lane, Elsenham, is not supported, on the grounds that an excess of new housing has already been allocated to Elsenham; detailed reasons are given in the response to the allocation ELS 1 in Section 15. (Elsenham Parish Council PSLP312) • Too close in proximity of roads, The proximity of employment being in South Cambs and not Uttlesford. High landscape value and visual sensitivity of the site for NUGC (PSLP504) • The infrastructure improvements actually proposed here and in the transport policy TA 4 relate almost exclusively to the road network with no assurance of what sort of public transport should be provided in the suggested public transport corridor. (Bishops Stortford Civic Federation; PSLP587) • Increased traffic movements making it difficult to travel around in Saffron Walden (PSLP600) • Increased pressure on road network (PSLP615) • Increased pressure on schools and Doctors Surgeries (PSLP615) • Loss of habitat (PSLP615) • Lack of any mention of sports facilities or playing fields; lack of any air quality reports in the AQMA in Saffron Walden. Inadequate protection of our listed heritage from traffic and pollution (Saffron Walden Town Council and Uttlesford District Councillor; PSLP705) • Whilst Hatfield Heath must be considered a significant rural settlement within the Uttlesford District and has all of the existing facilities and services that could identify it as meeting the requirements of a key village, its location within the Metropolitan Green Belt prevents it from being allocated levels of development commensurate with the role of a Key Village. This being the case, the Local Plan would therefore be more meaningful and relevant if another rural settlement be identified and allocated the status of a Key Village, thus allowing it to be a focus for development. (PSLP709) • Considerable uncertainty about the delivery and funding of the transport infrastructure required for the three garden communities, and the assumptions about start dates and housing delivery rates at the garden communities are unrealistic. It appears that the market towns and key villages will have a significant role in the delivery of the spatial strategy. (Carter Jonas PSLP774)
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	<ul style="list-style-type: none"> • There is a clear over-reliance on new garden communities in the spatial strategy; 34% of the total housing requirement of 14,000 dwellings is expected to be provided at the new settlements during the plan period 2011 to 2033, and 75% of the total number of dwellings to be allocated are in the garden communities. (Carter Jonas; PSLP774) • The Economic Viability Study (Pathfinder Development Consultants and Malins Associated Ltd (October 2016) and the Infrastructure Delivery Plan (Troy Planning June 2018) identify a number of highway and junction improvements and new public transport services that are critical to the delivery of each of the proposed garden communities, but in most cases the cost and funding arrangements are stated as unknown at this stage. (Carter Jonas; PSLP774) • The uncertainty about the funding and delivery of transport projects at the proposed garden communities in Uttlesford is identical to the concerns raised by the Inspector for the North Essex Authorities Strategic (Section 1) Plan. (Carter Jonas; PSLP774) • Housing numbers calculated using flawed data, population growth has been overstated. Most of the housing provision needed in South Cambs. (PLSP1791) • Lack of Transport Infrastructure (PSLP1794) • Future Employment projections at Stansted Unsubstantiated (PSLP1810) • We consider that the limitation of new homes in Type A villages to a total is 134 across the entire plan period is not justified as fails to provide opportunities for sustainable development to support the vitality of communities in accordance with paragraph 55 of the NPPF. (Strutt & Parker; PSLP1822) • New town an easy solution for political expedience (PSLP367) • Over-reliance on Garden Community to deliver housing need. (Stonebond; PSLP820) • Comments relates to paragraph 3.34. Reference to a new secondary school being delivered at Great Dunmow in paragraph 3.34 should be deleted. To meet forecast demand for secondary school places in the Dunmow area (excluding forecast demand from new settlements, which would incorporate new schools), ECC preferred option is the expansion of Helena Romanes School (HRS), which is achievable on the current school site. The potential relocation of HRS to the proposed education site has been a subject of discussion between ECC, HRS and UDC. ECC supports the plan to relocate the school subject to financial viability, and a proposal that does not require significant forward funding from ECC. (Essex County Council; PSLP873) • Further considerations need to be given to transport as area is gridlocked (PSLP1153) • The ability for the plan to deliver this ambition (Airport Growth) is however conditional on the appropriateness of the criteria contained within SP11 (a submission to that policy is made separately) which are not solely “environmental and transport” issues at suggested by this policy. Therefore, as written, the policy is too narrow in its definition and does not consider the wider social or economic issues that are introduced in SP11 or through national policy. (MAG; PSLP1486) • The housing target is based on incorrect assumptions re growth in the population (PSLP1517)
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	<ul style="list-style-type: none"> • Dominates the landscape and will severely degrade the visual aspects of the landscape. It is impossible to mitigate this. (PSLP1517) • The Cambridge commuters who will live there will use the south Cambridgeshire road network to get to Cambridge, choking already overloaded roads. E.g. the A505 and The McDonald's roundabout in Whittlesford. • Too little parking for car users and no facilities for buses to safely drop off and pick up. There are no plans to improve the road network or public transport in the area so this is a product of wishful thinking on the part of Uttlesford. The residents of the Chesterford new town will try to reach Whittlesford via the road network for faster trains, and as per my previous point the road network is inadequate for peak traffic as it is. The consequence of a lack of transport infrastructure improvements will be a large amount of rat running through the group of historical villages in the vicinity. (PSLP1587) • Lack of Evidence (PSLP1537) • Fails to take into account local constraints when assessing housing need. (PSLP1555) • Lack of growth in Thaxted (Linden Homes; PSLP1574) • Should recognise the importance of existing settlements (Type A Villages) (Newfield Agricultural Holdings; PSLP1596) • Elsenham should not be allocated to the "Key Villages" category. This is against the background of the disproportionately excessive amount of development that has already taken place in Elsenham and that already in the pipeline: 116 houses to the west of Hall Road, 40 at the Nursery site and 20 near the playing field. (PLSLP1602) • ONS predictions (17/05/18) which state that there will be an expected population drop of 4,500. The indication is that between 1500 - 2000 fewer homes will be needed by 2033. This rather begs the question as to why UDC is ignoring this most recent data on our area's (PSLP2165) • There is no justification given as to why NUGC should differ from the current local pattern of commuting to work being only 20% non-car. The Plan gives no detail as to how public transport links would be improved. UDC's assumption on travel patterns therefore looks totally unrealistic. UDC accepts that in the long term strategic road improvements will be required in order to cope with increased traffic generated by NUGC, but does not commit to funding any necessary improvements. The foregoing 4 sub-headings demonstrate that the Local Plan would create significant traffic and transport problems which are not justified by the evidence submitted by UDC and for which no mitigation is offered. (PSLP2176) • Concerned about housing affordability (PSLP2178) • Lack of detail on the three new garden communities (Chase Mew Homes PSLP2198) • Schools and Doctors Surgeries have not been considered. (PSLP2299) • Lack of a "Brownfield First" policy to seeking land provision (CPREssex; PSLP2313) • Coalescence of existing settlements (Little Easton Parish Council; PSLP2353) • Carver Barracks Brownfield site not included in the plan (Little Easton Parish Council; PSLP2353) • The plan does not set out how the enhanced development land value will
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	<p>be captured in order that the stated objectives for the settlements will be achieved. In the absence of effective structures to achieve this the risk remains that these become yet more isolated large developments of executive houses, with inadequate facilities. As building will continue for more than a decade, an overall development plan is required with outcomes for a sustainable housing/jobs balance, a mix of housing types and tenures, including low cost starter homes for both purchase and rent and include social housing. Essential infrastructure such as transport links, schools, shops and healthcare facilities must be provided from the outset. High quality overall design and professional delivery of garden villages will be critical to them becoming economically and socially successful communities that are desirable places to live. (Littlebury Parish Council; PSLP2401)</p> <ul style="list-style-type: none"> • Natural England’s overarching concern is the potential for the development strategy, alone, cumulatively and in combination with cross-boundary development, to impact on nationally and internationally designated sites. Key potential impacts include changes in air quality associated with increased traffic movements and increased levels of recreational pressure. Epping Forest SSSI, SAC and Hatfield Forest SSSI are likely to be significantly affected; however, sites such as High Woods, Dunmow, Quendon Wood and Elsenham Wood SSSIs may also be affected. The SA, informed by the findings of the HRA, will need to assess the impacts of Plan development, combined with cross-boundary development, on these sites and make recommendation to mitigate adverse impacts. The recommendations should be translated into detailed policy requirements to secure delivery of mitigation required to address adverse impacts through relevant development. Detailed mitigation measures and a mechanism for their delivery will need to be included within key policies “including, but not limited to, the Garden Community policies and Policy SP11 “London Stansted Airport. Similar requirements should be included within Policy EN7 “Protecting and Enhancing the Natural Environment to ensure delivery of required mitigation through smaller site allocations and planning applications. (Natural England; PSLP2451) <p>The proposed delivery timeframe for the GC’s and subsequent build out rates are totally unrealistic, bordering on naive and cannot be achieved. There will be a permanent 5-year housing shortfall and UDC have no control. The DLP is insufficiently evidence based and has been rushed to try and beat the January 2019 deadline. For the reasons stated in attached and via our Regulation 18 consultation response (see Appendix A) the DLP is not sound. No other conclusion can be logically reached. (Pelham Structures; PSLP2521)</p> <ul style="list-style-type: none"> • No evidence to justify spatial strategy. The spatial strategy generally has not been justified as the best strategy when compared with the reasonable alternatives. It is essentially just a housing site allocation; there is no economic strategy, no global warming, climate change or carbon footprint strategy, no environmental strategy, no sports, open spaces, health or well-being strategy, no green infrastructure strategy, no education strategy and no infrastructure strategy. LEARNINGS FROM SIMILAR ADJACENT LOCAL PLAN INSPECTION IGNORED: The similar and adjacent Braintree, Tendring, Colchester Local Plan was rejected because of an incomplete and un-costed Infrastructure Delivery Plan; lack of
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	<p>evidence showing the financial viability of new settlements; and poor evidence to show that sites were selected objectively. Uttlesford's Local Plan has the same issues and these were not resolved in R19. The withdrawal of the Braintree Local Plan also removes one of UDC's 3 new settlements as one was shared with the Braintree authority, so UDC is unable to show the delivery of its new homes in the R1 Balance has not been struck between the growth proposed at through new settlements and the growth proposed in existing communities. (Axis Land Partners; PLSLP2705)</p> <ul style="list-style-type: none"> • Provision of infrastructure upfront could delay the delivery of housing. (Axis Land Partners; PLSLP2705) • Additionally, while calculating the 5 year housing land supply, it is considered that the Council have used the "Liverpool" method, which seeks to average out previous undersupply in an annualised manner across the plan period. The alternative, "Sedgefield" method, which is recommended in Planning Practice Guidance, aims to frontload the backlog into the first five years, in order to encourage growth and address needs in a proactive manner.(Stonebond Properties LTD; PSLP2707) 9 draft plan.(Residents for Uttlesford; PLSLP2596) • Alternative Sites Not properly Assessed incl Chelmer Mead, Landscape Appraisals indicate that Garden Community Sites are in topographically sensitive locations and unlikely to be able to deliver housing numbers within the emerging plan. (Baker and Metson LTD; PSLP2710) • Development in type A villages is constrained (Particularly Manuden (The Battlement Trust; PSLP2715) • The use of settlement limits to arbitrarily restrict suitable development from coming forward on the edge of settlements would not accord with the positive approach to growth required by the Framework. Evidence: NPPF and Appendix 2 (Gladman; PSLP2788) • M11 and A120 overcapacity. (PSLP42) • House Numbers are unduly high for the district and not justified (PSLP257) • Paras 3.44, 3.45, 3.48, 3.52 and 3.55 refer to London Stansted Cambridge Corridor or "Innovation Corridor" without clarifying that this non-statutory, non-elected pressure group is primarily driven by Stansted Airport. It is inappropriate to justify a general Plan based on one view that has not been tested through elections or legislation.(PSLP641) • Disregard to historic interests (PSLP651) • The proportion of households assigned to Uttlesford by the ORS consultant's report (25.8%) is higher than that by the GLA (21.7%). This represents a difference of c. 2000 but no explanation has been offered - The latest population forecasts for Uttlesford are lower than previously stated - The policy on inclusion of care home/sheltered housing is unclear and inconsistent; both historically and with neighbouring districts - The annual housing requirement has been backdated to periods in the plan when it did not apply - Some committed developments have been missed out of the figures These discrepancies cast doubt on the validity of the housing targets in the plan.(PSLP697) • Too little new technology is being leveraged. (PSLP1117) • As written, this paragraph states that "London Stansted Airport, as London's third airport, puts significant pressure for development on the surrounding countryside". The overall purpose of the Countryside
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	<p>Protection Zone (CPZ) policy is supported, however this wording does not reflect that the airport company and its operation of the airport does not place pressure on the surrounding countryside. As detailed in the Stansted Airport Sustainable Development Plan (p.31) making best use of the airport can be delivered within the existing airport boundary. Currently, the text is misleading and the Council should clarify therefore what pressure for development the CPZ is attempting to protect against. (MAG; PSLP1518)</p> <ul style="list-style-type: none"> • Has not taken into account Wellcome’s plans to provide 1500 new homes. (Wellcome Trust PSLP1532) • We do not believe that UDC’s reliance on the use of private sector developers to deliver new single site settlements on the scale required by the Council is achievable, certainly not if the TCPA principles are to be followed. We understand that there has been no recorded instance in the history of the New Town movement in the UK where this model has been followed. Every significant new town development built to the TCPA principles has had a public sector oversight body which has provided an efficient and effective public sector Client side. UDC should insist on this model being followed for each of the proposed new settlements. (Residents for Uttlesford; PSLP2214) • Open Spaces are not backed up on policies map. (Saffron Walden Town Council;PSLP2318) • Not enough on communal and residential establishments despite aging community (Saffron Walden Town Council; PSLP2320) • Paragraph 3.61 Is the provision for 504 Care Home Spaces sufficient for an ageing population? (Birchanger Parish Council; PSLP2519) • Paragraph 3.80 Paragraph 3.80 of the plan states that delivery of the Garden Communities will commence in 2022/23. However, it should be made clear that this is an estimated date, and in any event, the Housing Trajectory indicates that West of Braintree will not commence until 2025/26 so the statement is misleading. (LANDSEC; PSLP2616) • Paragraph 3.70 Housing Trajectory and the five year supply See attached for representation in full. The stepped housing trajectory will result in an undersupply of dwellings within the first part of the emerging local plan period. The Council should be making every effort to meet their OAN on an annual basis. (Bovis Homes Ltd; PSLP2692) • Chapter 3 : Spatial Strategy Paragraph 3.33 “New” open spaces will be provided”. This is not backed up by any open space allocation in the Appendix Maps, therefore it is reasonable to assume that new open spaces will not be provided. Lack of provision of green space is unsustainable because future generations will not have access to enough green space to meet their health needs. (PSLP2928) • The continued operation and success of IWM Duxford has without doubt significant economic, social and environmental benefits for the region including Uttlesford district. As a significant and unique heritage asset of national importance, it provides employment opportunities and educational resources, and substantial local investment as one of the most popular visitor attractions in the region. 1.15 The protection of IWM Duxford in terms of its significance as a designated heritage asset and an operational aerodrome are not covered by national policy in sufficient detail nor are there other policies in the proposed plan to cover this. As such the following additions are requested to the draft Plan to ensure it is
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	<p>positively prepared, effective and consistent with national policy. 1.16 The safeguarding zone extends beyond the district boundary into Uttlesford district. It is requested for the reasons set out above that the safeguarding zone be formally recognised within the development plan. This would be by amending the policies map in the Local Plan to include the zone. (IWM, Duxford; PSLP3054)</p>
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • A further tier to the hierarchy should be introduced after point 1, which reads as follows: Fringe towns of Braintree and Bishop's Stortford where sustainable development that is proportionate to the scale of the settlement will be supported The above change will make the plan effective by ensuring that housing delivery is distributed to sustainable locations across the district reducing the reliance on the new settlements (Bloomhill; PSLP183) • Evidence of the co-operation between Uttlesford and neighbouring properties needs to be demonstrated so as to justify the use of the Liverpool Method. (Bloomhill; PSLP196) • Delete the allocation of 40 houses at Rush Lane, Elsenham. Correct the error in 3.36. Clarify whether Hatfield Heath is a key village.(Elsenham Parish Council; PSLP312) • Add new para 4 as follows:"4. Where village envelopes in respect of Type A and B Villages are of a shape or in locations which are inconsistent with the environment or appear not to be of logical layout or design, the opportunity will be taken to consult with communities to alter the boundaries of the village envelopes as appropriate." (PSLP424) • Commission and make public the results of air quality studies and analysis in the AQMAs. Publish plans for mitigation of the impact of increased traffic on the town center of Saffron Walden and the effect of pollution on the inhabitants and the historic buildings. ((Saffron Walden Town Council and Uttlesford District Councillor; PSLP705) • Policy SP2, and in particular point 3 of this policy, should be amended to state that: New developments in the Type A and Type B villages will be limited be supported to help enhance or maintain the vitality of these communities with the emphasis being on: a) Enhancing and maintaining the distinctive character and vitality of the rural communities; and b) Shortening journeys and facilitating access to jobs and services: and c) Strengthening rural enterprise and linkages between settlement and their hinterlands. Additionally it is suggested that reference is added to the policy to state that appropriate allocations are made through the Local Plan including within Type A villages such as Henham to enhance and maintain the vitality of these communities. (Strutt & Parker PSLP1822) • We support Policy SP2 and the Spatial Strategy, albeit that we consider that the supporting text to Policy SP2 could go further to highlight the strategic advantages of the selected garden community sites, including NUGC. (Grosvenor; PSLP937) • We suggest changing 'enhancing and maintaining' to 'conserving and enhancing' the distinctive historic character to more closely reflect the wording in the NPPF. (Historic England;PSLP1829) • Delete all words after 'limited' in paragraph 3 of SP2 (Gardner Planning; PSLP2151) • West of Braintree extension should be deleted from the Plan. Additionally, for reasons given above and the evidence referred to in response to Policy SP8, the SA requires revision to re-assess the scores given to each option.

	<p>This will demonstrate that the West of Braintree should not be selected as a preferred option, as found by the Inspector examining the North Essex Strategic Section 1 Plan. (Andrew Martin Planning; PSLP2473)</p> <ul style="list-style-type: none">• It is recommended that Policy SP2 be altered to the following: ‘New developments in the Type A and Type B Villages will be approved providing they meet the following requirements’ In the context of residential development, such requirements could include respecting the character and scale of the existing settlement, providing sufficient levels of accessible open space, and providing at least 40% affordable housing. For employment development, existing points a, b, and c could still be included. Such an alteration is considered to make the plan sound, as it highlights the importance of Type A and Type B Villages in their ability to deliver smaller sites across the duration of the plan period. As it has been demonstrated that there is an incentive for the Council to consider allocating a wider range of smaller deliverable sites, it is recommended that our client’s site is put forward as an allocation. Our client’s site, Land North of Station Road and West of London Road (please see attached), is located in the Type B Village of Wendens Ambo. The village has a range of amenities and services and it is considered that Wendens Ambo has excellent transport links to other nearby locations. Wendens Ambo is served by two regular bus services, the 59/60 and 301. The 59/60 service runs between Haverhill and Saffron Walden, whilst the 301 runs between Saffron Walden and Bishop’s Stortford. It should also be noted that the village is served by Audley End railway station. The station has an off-peak service of two trains per hour southbound to London Liverpool Street and northbound to Cambridge. In addition to this service is the hourly CrossCountry service between Stansted Airport and Birmingham New Street via Peterborough and Leicester, which is also supplemented by an hourly Greater Anglia service running between Cambridge and Stansted Airport. Our client’s site comprises approximately 0.8 hectares of arable land on the eastern side of the village. The site is bounded by residential development to the south-west, with agricultural land to the north and north-west. The B1039 and B1383 bound the site to the south and east respectively. Access could therefore be achieved off either of these roads. The site is largely free from any physical constraints; it is located within Flood Zone 1 and has minor alterations in ground levels. It should also be noted that the site is well screened by a belt of trees to the south and east. The site is in a strategic location for employment development due to being an approximate 2-5-minute walk away from the existing employment area and railway station. Whilst the Grade II Listed Fighting Cocks public house is located less than 100 metres from the site’s south-eastern boundary, any future development would be designed to ensure that minimal harm would come to the character and setting of the listed building. In terms of other policy constraints, it is acknowledged that a Protected Verge runs along the site’s southern boundary. Should this be incorporated into the scheme, it is recognized that the landowner would be responsible for its management and protection. It should be noted that the site was put forward under the 2015 Call for Sites process (REF: 02Wen15), with the subsequent Site Assessment indicating that development of this land for an employment use would be favourable. In particular, the Site Assessment indicates that the site could accommodate 560m² of B1 development. Moreover, the Site Assessment concludes
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	<p>that: the site is available and development is achievable subject to the protection of the special verge. The site is well located to road, bus and rail networks. The site is considered suitable as development contributes to sustainable patterns of development. In addition, the Uttlesford District Employment Land Review (Aecom, 2017) indicates that the Council should consider designating the site for B1 use class activities (see R2 under 'Recommendations'). However, upon review of the emerging Local Plan document, we are disappointed to see that the site has not been allocated for development. We therefore object to the emerging Local Plan in its current state, as no reasoning has been provided as to why the site has not been allocated for employment development, despite the fact that the site has been positively assessed by the two documents mentioned above. The site is suitable, available and viable, and could be delivered within five years. Should the Council be unsupportive of an employment allocation, we believe that the site could be alternatively allocated for residential development. It is anticipated that the site could deliver up to 24 dwellings in a highly sustainable location. (Audley End Estate; PSLP2634).</p> <ul style="list-style-type: none"> • As above paragraph 3.9: Policy SP2, and in particular point 3 of this policy, should be amended to state that: New developments in the Type A and Type B villages will be supported to help enhance or maintain the vitality of these communities with the emphasis being on: Enhancing and maintaining the distinctive character and vitality of the rural communities; and Strengthening rural enterprise and linkages between settlement and their hinterlands. (Stonebond Properties LTD; PSLP2707) • At least one more strategic allocation should be included in the plan (Chelmer Mead) (Baker & Metson; PSLP2710) • At Part 2 insert the following wording after rural area; In order to meet these objective new allocations in the form of minor extensions to some Type A villages are made to provide for modest development consistent with scale and character of the settlement. At Part 3: omit reference to Type A Villages (The Battlement Trust; PSLP2715) • More growth should be distributed amongst the 7 key villages as established sustainable communities (The Crown Estate; PSLP2744) • Delete all references to London Stansted Cambridge Corridor unless such mention clarifies that body's objectives, membership and relevance to planning matters. (PSLP641) • In the absence of clarity as to a precise threat, the general principle of countryside protection set in context of the Government's aviation policy for making best use of airports could be better reflected by the following change: "London Stansted Airport, as London's third airport, puts Without a proactive planning strategy, making best use of London Stansted Airport, could result in significant pressure for development on the surrounding countryside". (MAG; PSLP1518) • Paragraph 3.25 Change historic to heritage assets....this is the most commonly used term (see NPPF glossary). Welcome the addition of reference to sites of archaeological interest. Also suggest that Registered Parks and Gardens should be included in this list. (Historic England; PSLP1827) • Paragraph 3.83 Suggest the addition of a further bullet point to read 'conservation and enhancement of the historic environment' (Historic England; PSLP1830)
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	<ul style="list-style-type: none"> • Paragraph 3.88: We suggest that this paragraph should include more detail in relation to heritage assets both on site and in the wider area and discuss appropriate treatment of these assets. This will need to be informed by the findings of the HIA. (Historic England; PSLP1837) • The North Uttlesford Site has the potential to harm the significance of Heritage Assets. (Historic England; PSLP1853) • Any development supported through improvements in rail capacity linked to Crossrail 2 should be explicitly recognised in the Uttlesford Local Plan. (TfL; PSLP2114) • Paragraph 3.48 promotes the growth tourism, including Hatfield Forest National Nature Reserve. In response to the Regulation 18 consultation the National Trust objected to the reference to Hatfield Forest in this paragraph. As previously requested, the National Trust requests that reference to Hatfield Forest is moved to the following bullet point which is concerned with protection of the environment, rather than promoting growth and capitalising on the Forest. (National Trust; PSLP2496) • However, it should be made clear that this is an estimated date, and in any event, the Housing Trajectory indicates that West of Braintree will not commence until 2025/26 so the statement is misleading. (Landsec; PSLP2616) • Paragraph 3.44. As a neighbouring authority, Hertfordshire County Council (HCC) should be included on the list of adjoining local authorities that are identified in this paragraph. (East Herts DC; PSLP2653)
<u>Policy SP3 The Scale and Distribution of Housing Development</u>	
SUPPORT	
OBJECT	
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • The plan is informed by agreement with other authorities (e.g. Braintree) and based on joint working on cross border strategic matters (PSLP785, Galliard Homes) • West of Braintree can deliver more in the plan period, we suggest between 1,400 and 1,900, with development beginning in 2022/23 (PSLP785, Galliard Homes) • The policy is positively prepared to ensure housing delivery is achieved across the District for the Plan period, and by planning for at least 14,000 net additional dwellings to meet identified needs. Policy SP3 will be effective in ensuring delivery of new housing from a number of outlets in a sustainable manner throughout the Plan period whilst also protecting retained open and protected countryside and Green Belt elsewhere in the District (PSLP1989, Andrewsfield New Settlement Consortium) • Correct removal of unsustainable new settlement proposal in Elsenham: One area that the R19 draft Plan has made progress is the removal of the previously proposed new settlement/village extension to the north east of Elsenham (PSLP2559, Residents for Uttlesford) • We support the scale and distribution of housing development which seeks to meet the housing requirement for Uttlesford during the Local Plan period of at least 14,000 net additional dwellings. This accords with paragraph 47 of the NPPF, which seeks to boost significantly the supply of housing, requiring local planning authorities “to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing (PSLP393, Grosvenor Great

	<p>Britain & Ireland)</p> <ul style="list-style-type: none"> • We support the Housing Trajectory at Appendix 3, referenced at paragraphs 3.70 to 3.72 of the supporting text to Policy SP3, which sets out the proposed delivery rate for NUGC within the Local Plan period. NUGC will provide 5,000 new dwellings, of which 1,925 will be delivered during the Local Plan period (PSLP393, Grosvenor Great Britain & Ireland) • Henham PC supports this policy. Henham PC would object to alternative development elsewhere, including further development at Elsenham (PSLP2152, Henham Parish Council) <p>Chelmsford City Council is supportive of the approach (PSLP1769, Chelmsford City Council)</p>
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • Epping Forest’s Local Plan has been subject to a number of objections. There may be questions as to whether UDC will need to consider unmet needs. • The market signals adjustment fails to take into account the worsening affordability ratio in the District, including for ‘entry level housing’. • An increase in the housing requirement is needed to create flexibility, particularly in the first five years. Suggested adjustments: 20% increase or to 16,800 net additional homes. • The housing buffer contained in the plan, just 4.28%, is not sufficient to demonstrate flexibility to account for changing circumstances over the plan period nor to deliver a significant boost to housing supply, and is therefore not compliant with the NPPF 2012 paragraphs 14 and 47. Recent appeal decisions contradict the assertion that a 5% buffer is appropriate (refs: APP/C1570/W/16/3156864; APP/C1570/W/16/3156864; APP/C1570/W/17/3168869; APP/C1570/W/16/3166101. An inspector’s note to Guilford Borough Council’s examination, states that the Liverpool methodology and a stepped trajectory are not acceptable as they negate the purpose of the 20% buffer, frustrating attempts to address affordability. (PSLP2524, Home Builders Federation) • UDC will be unable to demonstrate a five year housing land supply for a number of years in the middle part of the plan period, contrary to paragraph 47 of the NPPF • A small delay in delivery would undermine the Council’s ability to deliver and demonstrate a five year land supply • There is no justification for the stepped trajectory or the Liverpool methodology this will not support a significant boost to housing supply, nor deal with a backlog in the first five years. There are suitable sites available to deliver early in the plan period. This serves as a retrospective approach to the plan strategy and is not consistent with national policy. Furthermore the 5% buffer is not justified when the requirement of 568 homes per annum has only been met in one of the six years, and there is an existing deficit (PSLP2524, Home Builders Federation) • The stepped trajectory equates to a requirement to deliver 45% of the overall housing requirement in the first half of the Plan period, and 55% in the second half, with 34% of the overall housing requirement being delivered by the garden community allocations. Even if UDC meet their housing requirement in the first half of the Plan, they will be behind in delivering the overall housing requirement. Any delays or failure to deliver the large-scale allocations will therefore have a significant, cumulative impact on delivery of the overall requirement. This is not considered to represent a positively prepared, effective strategy

	<ul style="list-style-type: none"> • The requirement to adopt DPDs before planning approval is likely to have delays on the delivery of the Garden Communities and lead to a shortfall in supply, particularly as there has been no progress to date • There is an overreliance on the Garden Communities and the long lead in times, significant infrastructure requirements and multi-agency coordination for Garden Communities mean that they will not deliver early, and alternative sites should be considered. Furthermore, work on their planning is at a very early stage, undermining the quick delivery. In latter years the Garden Communities account for 90% of completions (PSLP2524, Home Builders Federation) • Failure to meet housing needs risks choking off the economic prosperity of the district as workers struggle to obtain housing that is within affordable reach • The Council should consider planning for the need identified in the government's standardised methodology, this will mitigate against late submission, and the plan being found unsound and boost the housing supply and provide further flexibility • The standard methodology will take effect five years after the adoption of the current Local Plan. Should housing affordability in Uttlesford worsen, this will automatically increase to correct this. As such, it is much better that the Local Plan seeks to address identified needs in full and stabilise the cost of housing now • East Cambs' Inspector attached weight to the standardised methodology, MHCLG have told Councils that they should start using the government's new standard methodology with immediate effect if they do not have an up-to-date local plan. The Council should provide robust evidence to say why they do not need to use the standard methodology • The plan is based on growth estimates that do not take into account the impact of the UK leaving the EU • Type A and Type B villages are expected to provide just 134 dwellings, despite Type A villages being identified at Paragraph 3.38 of the DLP for a scale of development that reinforces their role as a local centre and supports their vitality. The DLP should ensure a proportionate level of growth for these settlements by allocating suitable sustainable and deliverable sites • Market towns, in particular Saffron Walden and Great Dunmow have good services and facilities and are well placed to take more development that would support the services and facilities in the towns • The concerns expressed by the NEA inspector have an immediate effect on the deliverability of West of Braintree, as well as the other two Garden Communities, the plan should not rely upon it • The issues identified by the NEA are applicable in Uttlesford • SLP3 makes provision for 1,120 homes on windfall sites, a far greater proportion than that through an opportunity to provide for properly planned allocations for the Villages, this abdicates decision making and does not allow for proper infrastructure planning. The availability of brownfield sites in the district is low and this rate is not justified • Paragraph 68 of the NPPF 2018 identifies that small and medium sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly • Simply because East Herts has used a particular market signals uplift does not mean it is appropriate for Uttlesford • There is a discrepancy between the stepped trajectory in SP3 and Appendix 3.
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	<p>705dpa should be applied consistently in the latter part of the plan period</p> <ul style="list-style-type: none"> • The Garden Communities will not be able to deliver over 250 plus units a year for a sustained period. The Lichfields report on large sites indicates 160 dpa or 100 dpa is a more realistic build out rate • This housing land supply falls well short of the five year requirement that needs to be demonstrate as a minimum in accordance with the Framework. This indicates there is a clear need for extra housing to come forward early in the Plan, in the order of an additional 1,000 dwellings, in order to ‘close the gap’ in the housing land supply and ensure the Government’s objective of significantly boosting the supply of homes is met • All key villages and type A are subject to an arbitrary and unjustified cap, this should be removed to allow each site to be treated on its merits • The plan is not justified having regard to reasonable alternatives • The SHMA, upon which the housing requirement is based, is not transparent and provides no audit trail • The SHMA area ignores potentially greater influences from Braintree (workers commuting to Stansted) and Cambridge (a destination for Uttlesford workers) • The period used to determine housing growth in the SHMA includes a period of exceptional population growth, distorting the OAHN • Growth assumptions for Stansted Airport are overstated and double counted • There is a circularity around homes being uplifted to balance with jobs and jobs being uplifted to balance with homes • The is an over-simplistic approach to migration • The rationale for the employment trends review is not easy to follow but appear to uplift growth to a “Stansted Trajectory” • The comparator districts for the market signals review do not compare will with the rural districts in the SHMA. Also considering the lower quartile prices has introduced an unjustified bias into the SHMA • The 20% market signals uplift is simplistic and “random” • The basis for the growth split between the four authorities in the SHMA area is not explained and disproportionately puts growth in Uttlesford • The SHMA has not been properly scrutinised by an independent reviewer • The treatment of concealed households and homeless households creates a bias to increase household growth • People in communal establishments are double counted • The rounding up of 13,880 to 14,629 is not justified • The two sites Els1 and Els2 are contrary to the Inspector into the 2014 Local Plan’s advice • The housing supply does not take into account Carver Barracks • Inadequate emphasis on affordable housing on exception sites • UDC is taking far too much growth and more growth than its fair share, exacerbating the north-south divide, and not focussing on those most in need in our district • Low cost accommodation can be provided by freeing up empty homes and second homes, by conversions and renovations. There are approx. 750 in UDC, 220 unoccupied for 6 months or more, and 545 unoccupied properties in Cambridge. One in 10 adults own a second home, while four in 10 adults own no property at all • The OAN is not NPPF compliant because: it rejects the official projections preferring longer term trends without clear justification (contrary to para 2a-017-20140306 of the PPG); the recent affordability adjustment from 20% to
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	<p>13.7% is not justified, 25-30% would be more appropriate; the assessment of affordable housing need excludes large groups likely to be in need; furthermore, an uplift of the OAN should be considered to better meet affordable housing needs</p> <ul style="list-style-type: none"> • Simultaneously bringing forward two to three Garden Communities is not realistic, both the Lichfield Review and NEA examination support this view. The coordination of infrastructure provision, particularly large-scale transport infrastructure further complicates this • An OAN of 900 dpa is more appropriate • Both Easton Park and West of Braintree require the construction of a rapid transit system. Very little work has been done to establish the feasibility and deliverability of this • The lack of differentiation between the trajectories for Easton Park and North Uttlesford is not in line with advice from the NEA examination or the Kerslake Review • Any slippage in the delivery of Garden Communities will remove considerable numbers from the plan period • The Lichfields report indicates that planning approval for large sites can take 5.3-6.9 years. This would imply planning applications for Easton Park and North Uttlesford needed to be submitted by 2017/18 to see delivery in 2022/23 • The SHMA does not consider suppressed household formation amongst younger people • To address affordability issues an uplift of 60% on household projections would be appropriate • London overspill has not been addressed • The deliverability of Woodside Way in Great Dunmow is question • The growth in the Local Plan is disproportionate to past growth • The housing requirement should be a minimum, and the plan should seek to deliver significantly more homes to mitigate against delay and lack of delivery on sites • Government guidance suggests 10-20% of residential permissions will not be implemented and 15-20% of permissions will lapse and suffer delays (PSLP2524, Home Builders Federation) • The infrastructure cannot cope with the level of growth proposed • Elsenham has too much development, ELS1 should not be allocated (PSLP314, Elsenham Parish Council) • The calculation for communal establishments is not shown anywhere (PSLP314, Elsenham Parish Council) • Placing housing in the north of the district, when the jobs are in the south is not sustainable • There has not been proper consultation with the Cambridgeshire authorities, who have already planned to meet the housing and job needs • Uttlesford has on average a delivery rate of 48 dpa on all sites, sites of 500+ dwellings are built out 27% slower than average; the trajectory is overly optimistic • The housing requirement is too high due to incorrect projections of job growth at Stansted Airport and too high population growth estimates • 1,560 dwellings not already completed fall within the Hatfield Forest Winter Zone of Influence, smaller sites should seek to provide open space, recreational land and green infrastructure to mitigate the impacts of people
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	<p>visiting Hatfield Forest. Similarly the delivery of a large scale country park is needed</p> <ul style="list-style-type: none"> • A pro-active windfall strategy is required to ensure delivery across the plan period • The strategy far exceeds the OAN for housing in Uttlesford, the figure of 13,332 from the SHMA 2017 should be used • Proposing three Garden Communities is too ambitious • Need for spaces in care homes should not be amalgamated with ordinary housing need, care home figures are not in the housing supply calculations • The housing requirement is too high and not based on the latest government projections (2016-based household projections) • The plan seeks to meet the housing needs of Cambridge & South Cambridgeshire • The failure of the plan to meet the needs early puts significant pressure on meeting the Housing Delivery Test • The strategy does not reflect the current development pattern and population distribution • Felsted has sufficient facilities to be classified as a key village as opposed to a Type A village and additional land should be allocated (in addition to the proposed allocations) • The market signals uplift is inadequate and will not address affordability in the district • Experience of delivery at Cambourne indicates a the delivery rate on Garden Communities should not exceed 239 dpa • Hatfield Heath is a key village without any allocated growth, this will erode services, local businesses and the community • The housing requirement in the Local Plan differs from the requirement in the Infrastructure Delivery Plan • Saffron Walden has too much development proposed within it given the constraints of the updated transport study and air quality issues (PSLP2217, Weareresidents.org) • Little or no duty to cooperate with Braintree District Council • Little or no duty to cooperate with South Cambs District Council <p>The North Essex Inspector also raised the point that the assessment of the chosen spatial strategy against alternatives that do not include garden communities had generally made optimistic assumptions about the benefits of garden communities, and correspondingly negative assumptions about the alternatives, without evidence to support many of those assumptions.</p> <p>As a result, the Inspector’s letter stated, "these assessments lack the necessary degree of objectivity and are therefore unreliable". Appendix 5 of the Uttlesford Regulation 19 Sustainability Appraisal makes the comparison between “traditional approaches” vs new “garden communities”. Whilst it is appreciated that this is a somewhat theoretical assessment, it would appear that this is written to give the impression that garden communities are a much more preferable option. For every criterion “garden communities” score better than “traditional approaches”, which simply cannot be the case if an objective view is taken. The assessment scores new settlements a “+” and traditional approaches “?” for encouraging sustainable patterns of development which does not appear to be fair, when existing infrastructure and services will be in place in existing</p>
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<p>settlements and in garden communities everything is starting from scratch and likely to be phased. Also In relation to providing appropriate housing and accommodation to meet existing and future needs, again new settlements are scored as a “++” whereas traditional approaches only a “+”. What the assessment of this criteria clearly fails to consider is issues such as meeting needs where they arise or preventing households breaking up and having to move away to satisfy their housing needs, which must form a key social component of the assessment criteria.</p> <p>There are a number of instances which question the objectivity of this assessment, which have knock on effects for the remainder of the assessment of the Strategic Options and needs to be reassessed more objectively.</p> <p>4.1 The site is assessed under reference THA4 of the emerging Plan’s Sustainability Appraisal (SA) and the conclusions are largely positive.</p> <p>4.2 The site is anticipated to have significant positive impacts on criteria relating to Groundwater Source Protection Zones, Green Belt, Countryside Protection Zones, ancient woodlands, minerals and waste facilities, public safety zones associated with Stansted Airport proximity to public transport, community facilities, delivering affordable housing and avoiding the loss of employment land.</p> <p>4.3 Positive impacts are identified in relation to the sustainability criteria for the conservation and enhancement of biodiversity, retention of TPOs, historic lanes, pollution, flood risk, cycleways and footpaths, proximity to shopping and a secondary school, PRoWs or bridleways, delivering a suitable housing mix, utilities connectivity and capacity in a nearby secondary school.</p> <p>4.4 A number of comments are made in response to the assessment scores:</p> <ul style="list-style-type: none">● The SA identifies a significant negative effect for proximity of water bodies, which is attributed when a water body is on the site according to the assessment pro forma. There is no water body on the site, the nearest being the stream within the existing hedgerow on the southeastern border. The Site Location Plan in Appendix 1 confirms this does not fall within the site.● The SA awards a negative score for the site’s moderate to high sensitivity to change taken from UDC’s HSCA. As discussed in the SHLAA critique, this assessment does not include a site-specific assessment and the evidence accompanying these representations confirms the site is entirely deliverable with minimal impact. <p>Additionally, a number of other sites, including allocated sites, score negatively against this criterion and therefore sites cannot be ruled out for this reason without compromising the ability of the emerging Plan to deliver the required amount of housing.</p> <ul style="list-style-type: none">● As greenfield land, the site is considered to have significant negative impacts with regards to prioritising the development of brownfield land ahead of greenfield. The lack of available brownfield land to meet housing need requires greenfield land to be allocated. Indeed, the vast majority of sites put forward for consideration are greenfield and limiting development on this basis would fail to
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<p>deliver sufficient housing to meet local needs. In delivery terms greenfield land is superior to brownfield, with development able to begin without the delay of any demolition or remediation works required which is integral to addressing the lack of a 5-year housing land supply in Uttlesford.</p> <ul style="list-style-type: none">● Negative scores are identified for the site’s location outside but adjacent to the settlement boundary and the presence of grade 2 agricultural value of the land as existing. Almost all other sites put forward, with the exception of one, scored negatively or significantly negatively against these criteria meaning the site is one of the better performing options despite receiving a negative score. Sites should not be discounted on this basis as the emerging Plan would be unable to deliver sufficient housing to meet identified need in this location.● The SA anticipates a negative impact on heritage assets from development of the site but acknowledges that mitigation is possible. The accompanying site-specific evidence confirms that any impact of development on heritage assets would result in the lower end of the less than substantial harm definition and the capacity for mitigation means the site should not be viewed negatively in this respect.● A negative score is awarded against flood risk, with the assessment locating the site within Flood Zone 2. This is inaccurate, as the site is entirely within Flood Zone 1. The site should be attributed a significant positive score.● Negative scores are awarded against criteria for proximity to GP services and a primary school as well as the quality of the potential site access. An appeal decision on Land off Walden Road¹ confirmed the sustainability of the village including accessibility to a wide range of services inline with Thaxted’s role as a Key Village. This is discussed further in section 3 below. Access to the site is perfectly achievable through the existing development to the north and the supporting highways note confirms this. The site should therefore not be scored negatively against any of these criteria.● The SA identifies a negative score against the Accessible Natural Greenspace Standard. All other sites in Thaxted scored the same or worse, including two allocated sites that scored significant negatives. In site selection terms, the site performs well against this criterion compared with alternative sites.● A significant negative score is provided against the recreational space criterion, which suggests development of the site is expected to result in a loss of recreational space. This is an incorrect assumption as the site is agricultural land is not currently used for recreation.● The assessment scores the site uncertain for the proposed density of development. The illustrative layout demonstrates that the proposals would sit comfortably within the site and development would seek to align with UDC’s density policy as required. This score should be positive for the site.● Primary school capacity is identified as an issue within the assessment, as is the case for a number of other sites including two allocated sites. Site selection should therefore not be based on the capacity of primary schools otherwise it would not be possible to allocate sufficient sites to meet housing need.

	<ul style="list-style-type: none"> ● The site is marked negatively for the distance to main employment areas, along with every other site in Thaxted. Discounting sites for allocation based on this criterion would mean housing need would be unmet in the village. ● Linden Homes requests that the Sustainability Appraisal supporting the emerging Plan is updated to reflect these comments and the evidence presented to support them. (Linden Homes; PSLP2789, PSLP1576, PSLP1574)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> ● It is considered that Policy SP3 should be modified to increase the housing requirement to provide for at least 16,800 homes in the Plan period to meet objectively assessed needs. ● Various modifications sought amendments to the number of dwellings in different towns and villages, often with specific site proposals linked to these changes. ● West of Braintree Garden Community should be deleted from the listed locations, and other reasonable alternative locations added or increased in capacity (PSLP2216, Stebbing Parish Council) ● It is considered that the Plan should identify a range of smaller and medium sized sites across the borough that can come forward expediently and early on into the plan period, to address a front loaded need ● The plan should use the Sedgefield method in line with the PPG ● The housing land supply should be recalculated based upon a flat rate of 636 dwellings per annum, addressing shortfall in the first five years of the Plan period, and applying a 20% buffer ● Various representations sought the allocation of additional sites to close a perceived gap in supply in the early / middle years of the plan. ● UDC should reconsider their SHLAA site assessments and identify additional suitable small and medium sites that can be allocated in the Local Plan that can be built out quickly. ● The trajectory must demonstrate delivery of a total of at least 4,567 dwellings over the first five years of the plan period, comprising 636 dwellings per annum, plus the shortfall accrued since the start of the Plan period and allowing for a buffer of 20% for persistent under delivery. ● The trajectory should include a windfall allowance of 50 dpa, rather than 70dpa. ● Remove ELS1 & ELS2. Take fully into account Carver Barracks ● Adopt an OAN which is no lower than 680 dwellings per annum; remove the stepped trajectory to meet need early in the plan period; allocate sites to meet this early need in existing villages. ● The Council needs to allocate additional sites to ensure the Plan provides an adequate provision of housing delivery within the first five years of the Plan ● The Council should not seek to artificially accelerate plan preparation and instead seeks to meet its standardised methodology figure ● It is suggested that the Uttlesford Plan also caps delivery rates on the Garden Communities at 250 dwellings per annum (125 at West of Braintree) – albeit this would still be optimistic and relies upon continually strong market conditions. ● A requirement in excess of 800 dpa is more reasonable in light of the very high housing pressures in the district ● If the requirement remains 14,000, a supply of at least 15,400 should be identified to allow for a greater contingency

	<ul style="list-style-type: none"> • The housing trajectory should be amended to reflect realistic delivery times • The Council should meet a rolling 5 year supply across the period and apply the Sedgfield method • Establish delivery models for the Garden Communities • Reflect uncertainty of delivery on the Garden Communities • Better understand infrastructure requirements; • The housing requirement should be increased and a buffer of at least 20% allocation (PSLP2524, Home Builders Federation) • Clarify the source for 504 communal establishments (PSLP314, Elsenham Parish Council) • A moratorium on further consents in Saffron Walden should be put in place until air quality and traffic studies and assessments have been carried out and publically reported upon • Felsted has sufficient facilities to be classified as a key village as opposed to a Type A village and additional land should be allocated (in addition to the proposed allocations) • A market signals uplift of 25% to 30% would be justified to improve housing affordability and should be reviewed in the evidence base.
Policy SP4 The Provision of Jobs	
SUPPORT	4
OBJECT	14
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • We support the provision of a minimum net increase of 14,000 new jobs in the Local Plan period, maintaining a broad balance between homes and jobs and maintaining a diverse economic base. (Grosvenor; PSLP945) • We strongly support paragraph 3.76, which states that the preferred scenario growth option is the most appropriate growth to plan for as it balances jobs growth with growth in homes, in line with the evidence from the West Essex and East Hertfordshire Assessment of Employment Needs. This supports the provision of 16,000 jobs over the Local Plan period. (Savills UK; PSLP2738) • We support paragraph Policy SP 4 - Provision of Jobs which sets an ambitious target to ensure, provision will be made for a minimum net increase of 14,000 jobs in the period 2011-2033 to maintain a broad balance between homes and jobs and to maintain a diverse economic base. We note paragraph 3.76 which states that the B use class jobs (offices, industrial and warehouses) will provide around 10% of the overall jobs growth in the District over the Local Plan Period. (PSLP2550) •
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • By not providing for a minimum net increase of 16,000 jobs, the Plan conflicts with paragraph 16 of the revised NPPF, which states that plans should be prepared positively. We therefore object to Policy SP4. (Savills UK; PSLP2738) • A Substantial portion (over 30%) of the housing development planned up to 2033 is in NUGC an area where no evidence is given of comparable job growth. The majority of the job growth information explicitly refers to other parts of the district. (PSLP308) • The forecast of future jobs on the Stansted Airport planning Application: UTT/18/0460/FUL is foreseen as being lower than that expressed on the reg19 local plan. (Stop Stansted Expansion; PSLP361) • The justification/explanatory text for Policy SP 4 states the evidence shows 16,000 jobs over the Plan Period is achievable, yet the policy states

	<p>14,000 jobs, with no explanation why lower. (Essex County Council; PSLP874)</p> <ul style="list-style-type: none"> • Continuing lack of B1 (c) and B8 accommodation or land. (PSLP1801) • B1 B2 and B8 land at North Stansted Employment Area wholly within the control of MAG. There are a number of physical and legal constraints. (PSLP1801) • Quick turnaround at other B1, B2 & B8 Sites highlights the illustrates the clear demand and lack of alternative sites in Uttlesford. (PSLP1801) • It does not make sufficient provision for employment land. The Council is placing undue reliance therefore, on a single source of employment land allocated, which is entirely controlled by a third-party land owner, with competing interests in terms of their operational requirements. This monopoly on the availability of employment land is clearly not healthy in maintaining a competitive local economy The respondent is of the view that the employment policies and allocations set out in the Regulation 19 Pre -Submission Plan, singularly fail to deliver the Councils aspirations or adequately provide for the Districts employment land needs for the life of the Plan. PSLP (Pomery Planning; PSLP1802) • We note Policy SP4 but note that no detail is given as to where the proposed jobs will actually be provided and we are not aware of any supporting documents identifying their location. It is not obvious what purpose SP4 serves without further detail. Additionally, from a sustainability perspective jobs are expected to be provided near new homes, so we would expect the policy to reflect this. (We Are Residents; PSLP2218) • The District already has high numbers of out-commuters. It is our view that this reflects both the high local skill base mentioned in the plan but also the limited local employment opportunities. The target of an additional 11,000 jobs over the period of the plan simply perpetuates the existing reliance on out-commuting. (Littlebury Parish Council, PSLP2402) • Statistics from the ONS indicate that the Councils housing requirement has not been based on a sound assessment of housing needs in the Housing Market Area. This is due to the fact that the proposed adjustment of 14% to take into account market signals has failed to address the worsening affordability ratio in the District, which rose from 6.95 in 2001 to 14.75 in 2017. This suggests that an uplift of at least 20% to the housing target is required in order for housing need to be met across the plan period. (Audley End Estate; PSLP2641) • Object to Draft Policy SP4 on the basis that it does not agree that the suggested minimum net increase of 14,000 is sound as it is not positively prepared. FFE question if the 14,000 figure properly reflects the opportunity for growth at London Stansted Airport (LSA) during the plan period. Similarly, on the basis that the Council has underestimated the potential for growth at LSA its approach to determining interrelated housing need associated with jobs growth during the plan period (given that the Council aims to maintain a broad balance between homes and jobs) also does not fully take account of economic growth at LSA. (Fairfield Elsenham; PSLP2781)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Change Paragraph 3.76 to include: Provision will be made for a minimum net increase of 14,000 jobs net increase of 16,000 jobs in the period 2011-2033 to maintain a broad balance between homes and jobs and to

	<p>maintain a diverse economic base. (Savills UK; PSLP2738)</p> <ul style="list-style-type: none"> • Policy SP 4 be amended to provide clarity on the number of new jobs that are to be delivered as part of the garden communities given 75% of the planned housing growth is being directed to these new settlements. Policy SP4 should also be amended to provide clarity on the number of jobs that are expected to be delivered from b class uses and non b class uses. (Carter Jonas; PSLP832) • Clarification of job numbers • Policy SP4 should be amended in order to reflect the required 20% uplift to the housing target outlined in Policy SP3. For example, the policy could read: Provision will be made for a minimum net increase of 16,800 jobs in the period 2011-2033 to maintain a broad balance between homes and jobs to maintain a diverse economic base. Such an amendment would therefore require further employment allocations to be made in the District, in order to ensure that enough jobs are created across the plan period. (Audley End Estate; PSLP2641) • The Council should reevaluate the potential for economic and employment growth at London Stansted Airport (LSA) and should adjust the provision for jobs growth proposed. (Fairfield, Elsenham; PSLP 2781)
<u>Policy SP5 Garden Community Principles</u>	
SUPPORT	3
OBJECT	34
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Reference is made to the proposed development plan documents for the garden communities including phasing, infrastructure and delivery plans. We support this requirement as it is important that proposed garden communities are phased to ensure that they are aligned with Anglian Waters water recycling infrastructure which is required to serve new development. (Anglian Water; PSLP878) • Following our comments on the previous regulation 18 consultation, this policy has been reworked and now includes a list of the TCPA garden communities principles which the Council welcomes. The overall policy aligns with the Braintree ambition to create holistically planned new communities underpinned by a comprehensive package of infrastructure. (Braintree District Council; PSLP2057) • We support Policy SP5 which proposes the delivery of three new garden communities in Uttlesford, including NUGC. We support the inclusion of the Town and County Planning Association’s (TCPA) Garden City principles that seek to deliver high quality new garden communities. 4.2 This accords with the NPPF at paragraph 52 which states that: “the supply of new homes can sometimes be best achieved through planning for larger scale developments such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities 4.3 This is further reflected in the NPPF (2018) at paragraph 72. (Grosvenor; PSLP947) • Policy SP5 (Garden Community Principles) is sound. Policy SP5 is positively prepared to ensure that high quality new garden communities, including the West of Braintree Garden Community, are delivered to meet garden city principles defined by the Town & Country Planning Association. The development vision and master plan submitted by Andrewsfield New Settlement Consortium (ANSC) in May 2015 towards the Council Call for Sites made absolutely clear the commitment that ANSC has made towards creation of a Garden Community following the principles set out at Policy

	<p>SP5. A copy of the ANSC development vision and master plan for the WBGC is enclosed with these representations. The scale and form of development proposed for the WBGC is fully justified within the robust evidence base prepared by UDC and also within the site specific evidence prepared and submitted by ANSC (copy enclosed). Policy SP5 will be effective due to, in the case of the WBGC, a small number of landowners who are committed and willing to see delivery of a new development meeting each of the Garden Community development principles. Policy SP5 is also effective as the policy recognises that there are a range of different delivery models that can be effective in implementing the Garden Communities. Policy SP5 is consistent with national policy ensuring that growth is Plan led and adheres to the guiding principle of achieving sustainable forms of development that meets the needs of the present without compromising the ability of future generations to meet their own needs. (Andrewsfield Consortium; PSLP1992)</p>
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • Proposal presents a risk to housing delivery and is therefore not effective. A delay in the delivery of one of the garden communities will have significant implications for delivery rates and the associated 5YLS. (PSLP185) • Additional allocations should be made to ensure that there is sufficient land identified for housing to maintain delivery during changing economic circumstances (PSLP185) • The first principle is Land value capture for the benefit of the community. But it is not clear as to how this works. There is a need to explain who pays what to whom and how and when. It should be further explained how this value benefits the community. A series of worked examples is needed. (PSLP382) • There is no reference at all to creating multi-user routes, just a scant reference to walking and cycling in point 8. This is at odds with the stated Garden Community Principles, point 9 at Appendix 4, (being an integral part of the Plan), which does correctly state the requirement for such routes to cater for all users, including equestrians. (Essex Bridleways Association; PSLP398) • We welcome the commitment (para. 7) to enhance the natural environment, provide comprehensive green infrastructure networks and achieve net biodiversity gains alongside the development of the garden communities. However, the precise wording of this policy does not accurately reflect national planning policy guidance. (Essex Wildlife Trust PSLP829) • With regards to self-containment and alignment with TCPA Guide Notes, surrounding non-car uses, The Local Plan should make clear the aspirations that will help to deliver sustainable Garden Communities particularly the required change in mode share to facilitate self-containment, and better reflect NPPF and guidance in this regard. (Essex County Council; PSLP875) • all three proposals are over-ambitious and there is considerable doubt as to whether the WoBGC can be justified and deliverable, given that it is wholly dependent upon the larger Braintree GC that is now in considerable doubt, having been found to be unsound in the North Essex Strategic Section 1 Plan. (Bloor homes; PSLP900)

	<ul style="list-style-type: none"> • Further clarity required on the definition of affordable housing TCPA principles vs Regulation 19 local plan (PSLP1042) • Policies do not address the historic environment. (Historic England; PSLP1832) • Lack of a DPD (Chase New Homes; PLSLP2190) • In regards to the West of Braintree Garden Community, We consider that the necessary evidence to justify that a Garden Community in this location is either deliverable or appropriate. (We are Residents; PSLP2226) • We note the reference in this policy to the garden city principles espoused by the Town and Country Planning Association. These do not form part of any formal Government guidance. The policy sets out a number of considerations which may be desirable but are not necessarily easily achievable, if at all. Planning, in a generic sense, and town and country planning in particular, are about the anticipation of future requirements and how these can best be met. However, the long-term future is sufficiently uncertain to make planning for it extremely difficult (Eclipse Planning)PSLP2281) • The three new settlements providing much of the new housing are to be developed in accordance with Garden Community principles, with several options being set it as to how this will be achieved. We consider this is most likely to be successful if an SPV focussed on the long term outcomes is established to oversee their development. There is a case for doing so jointly with other Essex councils, to give economies of scale and making it easier to recruit suitably qualified staff. (Littlebury Parish Council PSLP2406) • The plan purports to follow Garden City Principles to make it look reasonable but then ignores them in all but headings. The NUGV proposal bears no resemblance to the vision at the back - community ownership, spacious, no private sector for 20 years etc. (Wendens Ambo Parish Council; PSLP 2438) • Only one new country park is proposed in the local plan. (National Trust; PSLP 2486) • Missing financial models: There are no financial models for the proposed new settlements, meaning that they may be unviable. Considering high proportion of new homes proposed for new settlements, the financial viability should be modelled in the core local plan and not deferred to DPDs. (Residents for Uttlesford; PLSP2595) • All three schemes carry a risk of coalescence with neaby settlements (PSLP2654) • Assessment of SHMA unsound and will lead to a shortfall of supply . • Commitment falls short in building NUGC in accordance with Garden City Principles as defined by the TCPA(Ickleton Parish Council, PSLP2700) • Concern at the scale, complexity and development requirements of the new Garden Communities are such the delivery may be questionable. The Plan may contain unrealistic expectations for the delivery of neww housing on such developments. (Gladman Associates; PSLP2794) • The proximity of the three garden communities to each other (within 20 miles) and also within the two other garden communities proposed within Braintree / Colchester / Tendering, is of particular concern. As proposed, a total of five new garden communities, with a total new population of c. 140,0003, are planned along only a 25-mile of the A120. Together with the
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	<p>existing communities at Great Dunmow, Braintree and Colchester, along with a multitude of smaller settlements, a substantial proportion of housing growth in north Essex is proposed to be developed within a relatively small geographic area, but with the infrastructure necessary to support it still hanging in the balance and not yet committed. (PSLP2869)</p> <ul style="list-style-type: none"> • No DPD means a lack of clarity on the delivery model (Taylor Wimpey; PSLP2881) • Policy SP5 mentions land value capture for the benefit of the community. This has generally been very poor in the past in the northern part of Uttlesford. (PSLP2931) • Objects to NUGC on grounds that alternatives have not been adequately considered. (Wellcome Trust; PSLP2976) •
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Policy SP5, third paragraph. ECC reiterates its comment contained within our 2017 response, that the third paragraph of Policy SP 5 should include the word landscape. This will be important in terms of the provision of green space, landscape elements and the landscape setting of the new communities; these elements being particularly important in terms of implementing the Garden City principles referred to at the beginning of Policy SP 5. To omit any reference to landscape could imply the lack of a desire to ensure that good landscape design is an over-riding principle to underpin the master planning for the proposed development allocations. (Essex County Council; PSLP877) • Last paragraph. It should be made clear that the DPD will secure both housing and employment. Whilst housing is given as an example the provision of employment is seen as crucial for the success of the garden communities. The garden communities are not just about housing delivery but also the provision of jobs. This is reflected in the Local Plan itself and the TCPA garden city principles as reflected in Appendix 4 of the Draft Local Plan. (Essex County Council ; PSLP879) • Amendment to paragraph 3.83: Options for the extent of the boundary developable area will be considered as part of the preparation of the Garden Community DPDs but will include: 4.9 In summary we support Policy SP5 subject to the inclusion of the above amendments to the Policy and supporting text.(Grosvenor; PSLP947) • In drafting your principles for the development of new garden communities, we would suggest that you ensure that reference is made to the need to conserve and enhance the historic environment in line with the NPPF.(PSLP1832) • Therefore we consider that this wording should be amended to allow Outline Planning Applications to be progressed ahead of the DPDs, where these are delayed, or failing or in addition to this, to allow the DPDs and Outline Planning Applications to be worked up and submitted in parallel, if desired by the applicant and the LPA, and to assist in meeting the Councils housing delivery requirements. Policy SP5 also refers to there being a delivery model for each Garden Community. Although there may well be possibilities for its use, the reference is unclear in its ambit and needs to be much more clearly articulated in the plan so that discussions can be efficiently conducted. (Barton Wilmore for Landsec; PSLP 2605) • In order to make this policy sound, the Plan must include a timeframe by which the development plans for each of the Village Communities should be prepared in order to make it effective (Taylor Wimpey; PSLP2881)

	<ul style="list-style-type: none"> • SP5 should insist that the District Council, the planners and Parish Councils ensure that reasonable value is captured for the benefit of the community. Typically in the form of infrastructure, services and facilities such as village halls and recreation. (PSLP2931) • Additional Allocations should be made to ensure that there is sufficient land identified for housing to maintain delivery through changing economic circumstances. i.e. The Land South of Beldams Lane, Bishops Stortford. (Bloomhall ; PLSP185) • Include a clearer explanation of land value capture including working examples. (PLSLP382) • Amend SP5 to include all users. (PSLP398) • Amend SP5 to read as follows; provide comprehensive green infrastructure and coherent ecological networks achieve measurable net biodiversity gains (Essex Wildlife Trust; PSLP398) • Amend to include: "The new communities will be planned around a step change in integrated and sustainable transport systems that put walking, cycling and rapid transit networks and connections at the heart of growth in the area, encouraging and incentivising more sustainable active travel patterns" (Essex County Council; PSLP 875) • Amend 3rd Paragraph to read: The garden communities will be underpinned by high quality landscape, and urban design and placemaking principles and = including key landscape and urban design principles that will guide development. (Essex County Council; PSLP877) • Amend last sentence to include "employment" as follows and read: The criteria will be designed to ensure, for example, that the development will meet garden city principles and will secure the delivery of housing and employment throughout market cycles. (Essex County Council; PSLP879) • In drafting your principles for the development of new garden communities, we would suggest that you ensure that reference is made to the need to conserve and enhance the historic environment inline with the NPPF. (Historic England; PSLP1832) • Therefore we consider that this wording should be amended to allow Outline Planning Applications to be progressed ahead of the DPDs, where these are delayed, or failing or in addition to this, to allow the DPDs and Outline Planning Applications to be worked up and submitted in parallel, if desired by the applicant and the LPA, and to assist in meeting the Councils housing delivery requirements. Policy SP5 also refers to there being a delivery model for each Garden Community. Although there may well be possibilities for its use, the reference is unclear in its ambit and needs to be much more clearly articulated in the plan so that discussions can be efficiently conducted. (Landsec; PSLP2605) • An alternative spatial strategy and distribution of housing, with an evidence base that demonstrates the deliverability of that strategy. (Trustees of N Streeter Will Trust; PSLP 2869) • Must include a timeframe for the DPD's (Taylor Wimpey; PSLP2881) • SP5 should insist that the District Council, the planners and Parish Councils ensure that reasonable value is captured for the benefit of the community. Typically in the form of infrastructure, services and facilities such as village halls and recreation. (PSLP 2931) •
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Policy SP6 Easton Park Garden Community	
SUPPORT	12
OBJECT	543
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Waste Water: We are pleased to see statements that the first part of Water Cycle Study has identified that there are technical solutions for foul water flows for the garden communities. However a statement about protecting water quality and that there are options for meeting the challenging targets required, should also be added. Due to the high percentage of WRCs that are located at river headwaters with limited dilution capacity we expect part two of the Water Cycle Study to address the challenges of permitting for extensions or changes to WRCs (PSLP996, Environment Agency) • Flood Risk: We support the text within the utilities section that the communities will 'provide Sustainable Urban Drainage systems to provide water quality, amenity and ecological benefits as well as flood risk reduction (PSLP996, Environment Agency) • We welcome the preservation of historic sites but believe greater care should be taken of those in the Little Easton proposal (PSLP1641, Birchanger Parish Council)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • The site at Easton Park has consistently been judged by UDC as unsuitable, going as far back as 1993, and as recently as 2014 (PSLP2379, Great Dunmow Town Council) • Lack of sustainable transport options (PSLP2379, Great Dunmow Town Council; PSLP2346, Little Easton Parish Council) • A single access to serve 1,925 homes in the plan period is substantially in excess of accepted national guidelines for a maximum of 400 homes to be served from a single access point. It will be the biggest cul-de-sac in Essex. (PSLP2379, Great Dunmow Town Council; PSLP2346, Little Easton Parish Council; PSLP1740, Great Easton & Tilty Parish Council) • It is noted within the Council's Infrastructure Development Plan (IDP) which states "unless an additional access point onto the strategic highway network can be identified and delivered, access to Easton Park is a risk to scheme delivery." • A single access point will have implications for emergency access. • There are significant uncertainties due to the lack of evidence of testing of any other route and so SP6 relies on road capacity assessments that have not been properly carried out (PSLP2379, Great Dunmow Town Council) • The transport evidence base by not considering rerouting due to congestion is not compliant with the NPPF and does not properly assess the proposal (PSLP2379, Great Dunmow Town Council) • Not consistent with the NPPF paragraphs 17, 32, 157, 162 and 177. Increased use of the private car cannot be avoided and the site cannot be made sustainable by introduction of a regular bus service (PSLP2379, Great Dunmow Town Council; PSLP2346, Little Easton Parish Council) • Our transport evidence shows that there will be capacity issues on the A120 trunk road and flows diverting onto untested local roads (PSLP2379, Great Dunmow Town Council; PSLP2346, Little Easton Parish Council) • The cumulative impact of development on the A120 and Junction 8 of the M11 will be unacceptable (PSLP2379, Great Dunmow Town Council; PSLP2311, CPREssex; PSLP2346, Little Easton Parish Council) • There is a paucity of public transport routes that serve the site, and the site relies on the delivery of a North Essex wide Rapid Transit system. However,

	<p>the recent letter from the EiP Inspector Roger Clews into that plan dated 8th June 2018 gives rise to substantial questions over the delivery of this essential infrastructure to make the Easton Park site sustainable by reducing the reliance on the private car. (PSLP2379, Great Dunmow Town Council; PSLP2311, CPREssex)</p> <ul style="list-style-type: none"> • Our landscape report from Helen Thompson demonstrates that housing growth on the SP6 Site will give rise to a significant loss of valuable countryside, harm to the nearby ancient woodlands (including High Wood SSSI) and wildlife habitats, as well as loss of high- grade agricultural land (PSLP2379, Great Dunmow Town Council; PSLP2311, CPREssex; PSLP1740, Great Easton & Tilty Parish Council) • The infill of housing will result in the loss of a valued strategic gap between the market town of Great Dunmow and neighbouring villages important to prevent coalescing, and therefore contravenes the Great Dunmow Neighbourhood Plan and is not consistent with national policy on Garden Villages (PSLP2379, Great Dunmow Town Council; PSLP2311, CPREssex; PSLP2346, Little Easton Parish Council) • There is potential for substantial harm to Stone Hall (grade II* listed) (PSLP2379, Great Dunmow Town Council) • There is heritage harm at the higher end of less than substantial spectrum to other heritage assets including the Water Tower, Easton Lodge and Gardens and the Little Easton Conservation Area (PSLP2379, Great Dunmow Town Council) • Group harm would affect designated and undesignated assets, to properties in the surrounding villages and market towns which were properties of the original Countess of Warwick Estate (PSLP2379, Great Dunmow Town Council) • This site is the former Deer Park of the Easton Lodge Estate and provides the wider setting of the Lodge and the boundaries. It informs the significance and historic inter-relationship with the majority of the other heritage assets in the locality (PSLP2379, Great Dunmow Town Council) • Due to the extant working quarry on the SP6 Site, housing in the plan period is forced to the north west of the Site, which is two miles from the main road access (PSLP2379, Great Dunmow Town Council; PSLP2311, CPREssex) • The existing Roman high-status villa site to the west conflicts with access routes (PSLP2379, Great Dunmow Town Council) • The setting of heritage assets to the north and south are to be protected (PSLP2379, Great Dunmow Town Council) • SSSI High Wood to the east of the SP6 Site is to be protected (PSLP2379, Great Dunmow Town Council) • Stansted Airport countryside protection zone abuts the western boundary of the Site (PSLP2379, Great Dunmow Town Council) • Policy SP6 specifically recognises that road connectivity to the north is constrained because existing local rural roads are unsuitable for the volume of new traffic which will arise (PSLP2379, Great Dunmow Town Council) • The early phase housing location exacerbates harm to landscape and to the setting of heritage assets (PSLP2379, Great Dunmow Town Council) • The sites proximity to Stansted Airport is a constraint with airport noise and potential harm to the health and wellbeing of new residents (PSLP2379, Great Dunmow Town Council; PSLP2311, CPREssex; PSLP2346, Little Easton Parish Council) • Easton Park will have significant negative impacts on Great Dunmow including
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	<p>overdevelopment; loss of character; coalescence (PSLP2379, Great Dunmow Town Council)</p> <ul style="list-style-type: none"> • Easton Park will cause coalescence with Little Easton resulting in a loss of identity (PSLP2379, Great Dunmow Town Council; PSLP2311, CPREssex) • Easton Park will cause development sprawl from Stansted Airport to Great Dunmow (PSLP2379, Great Dunmow Town Council; PSLP1740, Great Easton & Tilty Parish Council) • There is a history of poor housing delivery in Great Dunmow and there is a lack of evidence in the plan that there will be sufficient demand to deliver 5,000 homes in the Dunmow area in the plan period (this figure is derived from the 3,000 consented but yet to be built in Great Dunmow at the same time as SP6 is expected to deliver 1,925 homes. This demonstrates an ineffective housing distribution across the district for housing delivery to 2033 (PSLP2379, Great Dunmow Town Council) • Carver Barracks will become available towards the end of the plan period and will be able to deliver faster than Easton Park on less valuable land (PSLP2379, Great Dunmow Town Council; PSLP2346, Little Easton Parish Council) • Policy SP6 fails to outline vital supporting infrastructure for the first phase of development (PSLP2379, Great Dunmow Town Council; PSLP1740, Great Easton & Tilty Parish Council) • The local infrastructure cannot cope with a new town here. • Policy SP6 provides no requirement for on-site employment during the plan period (PSLP2379, Great Dunmow Town Council) • Not supported by Sustainability Appraisal process, which was insufficient and inadequate. The way alternative sites were considered was flawed. The SA process relied on insufficient and inadequate information. The selection of Easton Park is not supported by the evidence. (PSLP2379, Great Dunmow Town Council) • The area in the promotor's masterplan south of the A120 for associated employment land is approximately two miles from where homes can be built near Easton Lodge, with proposed access via a farm bridge with limited weight capacity and it is not in LS's ownership. If the access proves unsuitable, the aim of keeping journeys within the site will not be achieved and will impact sustainability (PSLP2379, Great Dunmow Town Council) • Easton Park cannot be developed to Garden City Principles (PSLP2379, Great Dunmow Town Council) • In early phases Easton Park, before services and facilities are in place, will place significant pressure on Great Dunmow (PSLP2379, Great Dunmow Town Council) • The policy should require the adoption of a SPD / DPD Masterplan to guide the development in the plan period which should be annexed to the local plan policy. The Masterplan needs to address broad areas of growth, new road access and buffering areas, and identify heritage and landscape mitigation measures to inform housing growth. Heritage buffering measures and the outline of the proposed Country Park and mitigation land should be shown on the Masterplan, along with ancient woodland protection (PSLP2379, Great Dunmow Town Council) • The policy should require the transfer of the mitigation land to safeguard a gap to reduce coalescence, which would require in SP6 that the site refused for 700 homes West of Great Dunmow will not be developed and draft Heads of Terms should be drawn up so that the transfer can be formalised at the
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	<p>point when the plan is approved (PSLP2379, Great Dunmow Town Council)</p> <ul style="list-style-type: none"> • The policy should make clear that there will be no airport-related use of the employment land at Easton Park (as this would conflict with UDC airport policy) and this must be written into the policy (PSLP2379, Great Dunmow Town Council) • The policy should require an additional access junction with the A120 to address traffic impacts and the necessary development infrastructure should be brought forward and resourced by the Garden Community Management Company (PSLP2379, Great Dunmow Town Council) • The policy should require that a regular dedicated direct bus link be provided between Great Dunmow, the new community and Stansted Airport (PSLP2379, Great Dunmow Town Council) • The policy should require existing road improvements and a new car park should be provided within Great Dunmow so that Easton Park residents will have access to services and amenities in the town (PSLP2379, Great Dunmow Town Council) • Development is not required as sufficient sites are already allocated. • A new rail line is a daydream. • Development will be meeting London’s needs. • Development here will make the area ‘outer London’. • Great Dunmow will be dwarfed by this development and the High St will suffer. • Our pleasant green land will be totally obliterated. • Development will badly affect our wildlife. • Development here will cause air pollution. • Development here will affect our carbon footprint. • Loss of beautiful, tranquil area. • Impact on quality of life of nearby communities. • The roads cannot cope with excess traffic from the development. • The area has enough development already. • The local roads are too narrow. • Hospital and Dr waiting lists are too long already. • Schools are already oversubscribed. • I am also very concerned about how there will be adequate water supply for the area with this volume of housing. • Only one access road will never work. • The site boundary includes ancient woodland. Your own policy within this plan indicates that ancient woodland is an irreplaceable habitat and that development affecting it should usually be refused. Since we wrote our previous letter, the NPPF has been amended to indicate that ancient woodland should only be lost to development in wholly exceptional circumstances. Whilst the new NPPF is not yet fully in force, it is a clear indication of Government's desire to see ancient woodland given the highest possible level of protection (PSLP818, the Woodland Trust) • This is a new town in the Green Belt. • This plan is solely for rich developers to build buy-to-let houses to sell to other rich individuals to let to transient airport workers at high rents. • There is no reference to the creation of multi-user routes within this new community in accordance with the stated Garden Community Principles. Any links created to the Flitch Way, which is a definitive bridleway, should also carry the same definitive status. It is noted that point 10 aspires to ‘enhance
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	<p>the existing public rights of way network’ but this gives no clue as to whether access for all is included within this aspiration (PSLP625, Fritch Way Action Group)</p> <ul style="list-style-type: none"> • The identity of Great Dunmow as an ancient market town would be lost forever. • The uncertainty due to Brexit and Climate Change mean this is the wrong time to develop here. • The area around Dunmow is taking the biggest share of development. • The development will mean that the privately owned part of the Gardens of Easton Lodge will no longer be accessible to the public. • The development will destroy the setting of the Gardens of Easton Lodge. • There is no evidence that Easton Park will provide one job per home, as the Garden Community Principles require. Stansted Airport will not provide the necessary jobs. • Increasing journeys made by bicycle is not realistic as bikes are not allowed on the A120, and traffic on the B1256 will discourage anyone but the most experienced cyclist. • The rapid transit system to Stansted Airport will merely serve to make the new town one huge car park for workers at the airport and those travelling from it – exacerbating the existing fly-parking problem that the area already has to endure. Furthermore, such a transit system would inevitably pass through the village of Broxton where the local, single track, roads are entirely unsuited for such traffic. • With no local jobs many residents of the new town will wish to travel to London or Cambridge by train. Bishop’s Stortford station has neither the car parking facility or capacity on the trains to accept such a huge increase in potential passengers. Neither have Stansted Mountfitchet or Elsenham, the two next nearest stations. • A town this far south in the District will supply migrants from London, not provide the type of housing local people want...i.e. dispersed around the villages. • The location/estate proposed is over 10 miles, straight line distance from the nearest A&E, risking poor outcomes from major trauma, stroke, cardiac arrest and head injuries (see The Golden Hour/Time) and will increase pressures on The East of England Ambulance Service. Attending to routine appointments at hospital clinics will be difficult due to the lack of public transport, more tiring and expensive due to this distance and will place unnecessary pressure on hospital and volunteer transport services. Visiting will be more difficult for elderly partners/relatives for the same reasons. • There is no train station locally. • If there were a path it is too far to be practical to walk to Stansted Airport Station from Easton Park for anyone with time constraints. Stansted Airport has the most expensive season ticket of the local stations. • One secondary school is not enough, parents want choice, many will not use the nearest state school for personal, religious reasons etc. • The site is already a treasured area for walking/ trail running/horse riding etc and within a triangular area between three SSSI and the location of habitat for several red grade endangered birds and other rare wildlife mentioned in The Uttlesford and Essex Biodiversity Action Plan. • Hatfield Forest which is now over used and suffering damage due to the insensitive, exponential housing growth in Takeley bring excessive numbers of
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	<p>new visitors into the locality.</p> <ul style="list-style-type: none"> • Highways England interest with the proposal is with the potential impact on the Strategic Road Network (SRN) and its ability to be able to operate safely and efficiently with the proposals in place. In particular, our interest relates to the M11 and A120. Highways England have been heavily involved in the transport evidence base and support the enhancement to public transport and sustainable mode offer across the district and practically for the garden village developments. It will be essential for all development, and in particular for the garden villages, that housing comes forward along with schools, Drs Surgery's, other health care provision, shops, jobs, public transport and other infrastructure as the demand arises (PSLP3026, Highways England) • The Garden Community promoters proposed significantly higher delivery rates, which would have delivered approximately double the number of homes allocated to Easton Park Garden Communities within the plan period. We continue to be interested to understand the justification for this delivery rate assumption and whether a higher rate could be achieved that would undermine the need for three Garden Communities. • It has not yet been demonstrated that the Garden Communities allocations – either for the Local Plan period or in full – are deliverable, that their impacts can be properly mitigated, or that the assumptions surrounding self-containment are achievable. • In order to conclude that the Garden Communities are viable, the Economic Viability Study (June 2018) states that it relies on indicative phasing assumptions set out in the Infrastructure Delivery Plan (IDP)⁴. However, it is clear from a detailed review of the IDP that it does not identify definitive timings or thresholds for the delivery of infrastructure. (The phrase “it will be for the masterplan process to establish when [x] will be delivered” is used frequently). It is therefore not yet clear how the Viability Study can be relied upon to evidence the viability – and therefore the deliverability – of the Garden Communities. • It remains unclear whether the proposed delivery rates would allow for the development of a critical mass that would facilitate sufficient developer contributions to fund their associated infrastructure requirements. At present, UDC does not have a Community Infrastructure Levy (CIL) charging regime in place and, therefore, it is possible that pooling restrictions on the collection of Section 106 contributions could act as a further constraint to the funding of necessary infrastructure requirements. • A Rapid Transit System that terminated at Stansted would not achieve a significant modal shift. • The modal shift expectations are unrealistic (PSLP2346, Little Easton Parish Council) • No evidence that local people will be able to afford the homes at Easton Park. • It is vital that the proposed Garden Towns, which as a concept I support, have good access to major roads and motorways. In the south one can only presume that this will be to the A120 but one cannot go far on that road without meeting disruption caused by poor links to other roads, including itself west of Birchanger and to the east, east of Braintree. In the north links to the M11 and routes to Cambridge and Newmarket must be accessible but here again these roads are already close to carrying maximum traffic. • Easton Park cannot rely on jobs at Stansted Airport, as other residential developments have already relied upon them. • The NEA Inspector's concerns around the evidence supporting the Rapid
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	<p>Transit System for their Garden Communities, equally applies to Easton Park.</p> <ul style="list-style-type: none"> • If the DPDs are adopted by the end of 2019, the earliest a planning application could likely be submitted would be the end of 2021. Assuming a determination period of 12 months, the application wouldn't be approved until the end of 2022. This is a conservative estimate and timescales could well be elongated. The level of infrastructure required for such large scale developments before construction of dwellings can even begin is significant and as such, it would be highly unlikely that dwellings would start to be completed by 2022/23. The delivery of 100 units from garden villages in 2022/23 therefore seems highly unlikely and has implications for the whole housing trajectory for the latter 10 years of the Local Plan period. • Research by Lichfields in 2016 shows the timescales of 15 garden villages from first identification through to planning approval. All three of UDC's garden villages are at the top of the range examined by Lichfields in terms of housing numbers and far exceed 2,000 units. The Lichfields evidence suggests that the timescales for obtaining planning approval on a site of this size is likely to be in excess of four years. Therefore the timescales indicated by UDC in their Local Plan seem even more unlikely. Again this points towards why significantly more housing is required from additional allocated sites in the early part of the plan period. • In 1937 the Countess of Warwick designated Easton Park as a nature reserve and sought to ensure this survived through an agreement signed in 1939 with the District Rural Council of Dunmow to limit development within the Park to ten dwelling houses. This agreement remains extant. • The policy relates to the provision of a new garden community at Easton Park which would provide 10,000 new dwellings in total with a minimum of 1,925 of these being provided during the plan period to 2033. Thames Water have been liaising with the Council and Environment Agency in relation to the wastewater infrastructure requirements for the site and have been co-operating with the production of a Water Cycle Study for the wider area. There are a range of options for delivering wastewater infrastructure that is likely to be necessary to accommodate the development at Easton Park and within the wider area which are being reviewed to establish the most appropriate approach (PSLP2583, Thames Water) • Anglian Water as sewerage undertaker is generally supportive of the requirements relating to foul and surface water drainage as outlined in Policy SP6 relating to Easton Park Garden Community. However the wording relating to the requirements for foul drainage and sewage treatment appears to be duplicated in first and second sentences of paragraph 18 of the policy and should be amended to ensure it is effective (PSLP2513, Anglian Water) • East Herts Council queries the effectiveness of reference to rapid transit measures to Stansted Airport in Policy SP6 (Easton Park), Policy SP11 (London Stansted Airport) and TA4 (New Transport Infrastructure or Measures). While East Herts Council supports this in principle, as it would increase options for sustainable access to the airport and nearby settlements, such measures are not addressed in the current planning application for the expansion of the airport to accommodate up to 43 million passengers per annum. The application is likely to be determined in advance of the adoption of the Local Plan and therefore such ambitions may be prejudiced by the determination of the application in advance of any formal endorsement of rapid transit networks by either Essex or Hertfordshire County Councils in their role as Highway Authorities (PSLP2500, East Hertfordshire District Council)
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	<ul style="list-style-type: none"> • The NEA Inspector has found that the proposed West of Braintree New Community is not deliverable primarily because the financial plan is not viable. In that approximately 15% of the UDC plan relies on this joint community then at this time the housing numbers required in the UDC Plan cannot be delivered in the plan period. • UDC has failed to consider altogether the financial viability of its plan; hence the financial viability of the proposed New Community at Easton Park cannot be demonstrated to be financially viable. • UDC defers too much detail to the DPDs. • A proposal for a major expansion of Stansted Airport will have major transport implications and yet there has been no integrated consideration of the cumulative effects. Without such a consideration no Plan can be considered sound (PSLP1740, Great Easton & Tilty Parish Council). • I object to a last—minute addition of a large tract of land to the south of the B1256 which has been designated as land for industrial use. There has been a lack of transparency, ethicality, possibly legality and certainly democracy. • The B1256 forms a natural boundary to development happening on the north side of the A120. • Young people will not be able to afford homes in the new town without assistance from their parents. • Loss of greenfield land. • This is an area of low rainfall and water shortage. • This application will join Little Easton with Dunmow, thus losing its village status, and the important buffer zone between them. • Any second runway would be very close to the new town. • Easton Park and West of Braintree: Policies SP6 and 8I am disappointed that again the bulk of the new development proposed in the Draft Local Plan is in the south of the district along the A120. This part of the district has taken the highest proportion of development in Uttlesford over the past 10 years, particularly in Takeley and Great Dunmow and there is already more development in Dunmow that has been approved but not yet built. • Development will affect bridleways and riding amenity land for equestrian and other rural pursuits. • The Council is required by the NPPF to take account of Government policy on airports in the development of Local Plans. Therefore, in order to achieve a sound plan, the Council needs to fully assess and make evident how it has addressed the impact of the forthcoming aviation strategy and the modernisation of airspace, on the Local Plan and the Easton Park & west of Braintree proposed allocations. Furthermore, the Civil Aviation Authority (CAA) is currently consulting (until 10 September 2018) on a 'Draft Airspace Modernisation Strategy' which will replace the existing 2011 'Future Airspace Strategy' and provide a co-ordinated strategy and plan for the use of UK airspace for air navigation up to 2040: a final version is due towards the end of 2018. (PSLP1527, Manchester Airports Group) • The vision for Garden Cities does not align with the Easton Park development proposal. Ebenezer Howard, a had vision to create: 'a utopian city in which people live harmoniously together with nature'. Garden Cities were to avoid the downfalls of industrial cities such as urban poverty, overcrowding, low wages, dirty alleys with no drainage, poorly ventilated houses, toxic substances, dust, carbon gases, infectious disease and lack of interaction with nature. It proposed the creation of new suburban towns of limited size,
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	<p>planned in advance, and surrounded by a permanent belt of agricultural land.</p> <ul style="list-style-type: none"> • This area is very close to the Highwoods, Dunmow SSSI (Site of Specific Scientific Interest) and the need to prevent negative impacts should be explicitly recognised in this policy and supporting text (PSLP891, Essex County Council) • ECC is supportive of bullet points 4, 5 and 6. However, there should also be consideration of connectivity to these green and open spaces, allotments and recreational facilities to ensure that access to green spaces is as easy as possible. Connectivity of green spaces can help to enhance recreational experience and opportunities, especially if there are footpaths or cycleways between them (PSLP883, Essex County Council) • It is recommended that the Policies SP 6, SP 7 and SP 8 include employment floorspace allocations and/or employment land requirements; a point made by the Planning Inspector to the North Essex Authorities when he reported on their Section 1 Local Plans (letter issued 8 June 2018) (PSLP880, Essex County Council) • The impact of a new town of 25,000 people on Great Dunmow has not been properly calculated or considered. • The Easton Park garden community relies heavily on the proposed dualling of the A120 to the east of Braintree. This dualling has not yet been committed to by Highways England – a point highlighted in the Inspector’s comments on the Section 1 North Essex Authorities (‘NEAs’) emerging Local Plan (see Appendix 2): “36.In addition, a decision has yet to be made on the alignment for the dualled A120. The alternative alignments still being considered have quite different implications for the A120’s relationship with CBBGC • An instructive local example to understanding how long Rapid Transit System can take to develop is the Greater Cambridge City Deal (GCCD) which, since its inception in 2015, has been working up several low-level public transport interventions around Cambridge including bus priority routes and a traditional busway (i.e. non-guided). This has been with substantial financial support from Central Government totalling £100m. It is now the latter half of 2018 and although there has been great deal of technical and consultation work, it is unlikely that these relatively minor interventions will be delivered before 2020. The Rapid Transit route is a more significant intervention than those which the GCCD is exploring – particularly if it involves light rail or busways – and would likely take significantly longer to plan and deliver. • Development here will result in 5 new towns along the A120 corridor within a 20 mile radius. • How will Land Value Capture be achieved? This is not clear. • The DPD should consider opportunities for appropriate scale development and linkages between these areas (Stansted Airport, the A120 / M11 junction and corridor) are considered as part of this process. • Strategic Growth DPDs are referred to in Policies SP6 (Easton Park), SP7 (North Uttlesford) and SP8 (West of Braintree). However, these are not explained anywhere else in the document. It is unclear whether these are the DPDs to be produced for each of the Garden Communities as referred to in 3.82 and SP5. Assuming this to be the case, for clarity the terminology used throughout the plan should be amended so it is consistent (PSLP2608, Landsec) • At point 3, the plan sets out the facilities required to be provided within the Garden Community. We are unclear of the basis for the specific requirements listed, as any requirements will need to be assessed as part of planning application process, and as the development progresses. For example, if the
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	<p>development ultimately provides significantly less than 10,000 units, it may not be appropriate to deliver seven primary schools. The actual number of schools will be determined using pupil/product ratios at the time of granting planning permission/delivery of the scheme. Therefore we do not consider it is appropriate for the Local Plan to be specific in terms of the number of schools. Instead we consider that schools should be treated as per the other facilities listed, where it is simply confirmed that these will be included in the Garden Community (PSLP2608, Landsec)</p> <ul style="list-style-type: none"> • While Landsec supports the provision of a direct sustainable link from Easton Park to Stansted and from Easton Park to Woodside Way, neither is essential for delivery of a sustainable Garden Community at Easton Park (PSLP2608, Landsec) • Point 25 refers to the potential to use of compulsory purchase powers to facilitate delivery of the Easton Park Garden Community, where this cannot be achieved by agreement. It is unclear what agreement the policy refers to, and the circumstances in which this policy might take effect. If it is linked to the determination of the appropriate delivery model, as referred to in Policy SP5, we consider this should be removed from the plan, as it is not a land-use planning matter, or better defined in line with our comments above (PSLP2608, Landsec) • The primary concern is that the proposed garden community will cause significant harm to the valued landscape, ancient woodlands and the setting of Easton Park Estate and Little Easton Conservation Area. In fact it would impact adversely on all the surrounding villages which are inextricably linked with the history and identity of this unique area (PSLP2311, CPREssex) • We support the continued designation of the Countryside Protection Zone around Stansted Airport but are concerned about its future value given that Policy SP6 is proposing a development of 10k new homes on land which is physically contiguous (ie on the other bank of the River Roding) with that of the CPZ. It appears somewhat paradoxical to uphold the CPZ concept “to protect the rural character of the countryside and prevent changes to the rural settlement pattern of the area” on one hand but then propose a huge new settlement directly abutting the eastern boundary of the zone (PSLP2311, CPREssex) • The development is within the likely zone of influence for potential air quality impacts, through increased traffic levels, to Epping Forest SSSI, SAC, Hatfield Forest SSSI, High Wood Dunmow and Elsenham Woods SSSI. The policy must recognise this and include a requirement for implementation of any measures identified as necessary, through the Epping Forest SAC Mitigation Strategy, or other appropriate strategy for addressing air quality impacts on SSSI’s The policy should specify a funding mechanism for the delivery of the agreed measures (PSLP2453, Natural England) • The development is also within the ZoI for recreational impacts to Hatfield Forest SSSI, as identified through the National Trust Visitor Impact and Access Management study, discussed above. This should be acknowledged within Policy SP6 and a requirement included for development to provide a contribution toward implementation of appropriate mitigation measures - identified through the National Trust study as necessary to address the adverse effects of increased recreational pressure. The Council will need to agree the specific measures / level of funding required to deliver these through this, and other relevant development in the district, with the National Trust and Natural England. For Easton Park Garden Community this is likely to
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	<p>include delivery of a Country Park as specified in point 6 of the policy. The policy should specify a funding mechanism for delivery of the agreed measures (PSLP2453, Natural England)</p> <ul style="list-style-type: none"> • A development of this scale should include a requirement to deliver landscape-scale net biodiversity gain in accordance with paragraphs 20, 170, 174 and 175 of the NPPF and the aspirations of the recently published Defra 25 Year Environment Plan. This should be cross-referenced with a requirement for the development to make a positive contribution to the Essex Living Landscape initiative, through appropriate habitat creation and enhancements (PSLP2453, Natural England) • The policy should also promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity, in accordance with paragraph 174 of the NPPF (PSLP2453, Natural England) • Natural England advises that the allocation site is likely to comprise a considerable amount of agricultural land, some of which may be classified as 'best and most versatile' (BMV) agricultural land (Grades 1, 2 and 3a land in the Agricultural Land Classification (ALC) system). The policy should include explicit requirements for development to protect BMV land in accordance with paragraph 170 of the NPPF (PSLP2453, Natural England) • At the closest point the Easton Park site lies at JUST 285 metres from the extended Great Dunmow so cannot be seen as separate or anything other than an extension of Great Dunmow. • Currently Great Dunmow has circa 2,000 homes consented but not yet built which will put further strain of current services and infrastructure without the addition of Easton Park. • The development is too big. • Easton Park will increase run-off leading to flooding of existing communities. • The proposal for three garden communities presents a risk to housing delivery and therefore is not effective. A delay in the delivery of one of the garden communities will have significant implications for delivery rates and the associated five year housing land supply and therefore additional allocations should be made to ensure that there is sufficient land identified for housing to maintain delivery during changing economic circumstances. • Criterion 4 is not consistent with the content of policy INF2 (the general policy that covers sports facility provision in new development) which has been revised between the draft and pre-submission versions. Policy INF2 requires new development to make indoor and outdoor sports provision in accordance with the most up-to-date Sports Strategy which is supported by Sport England and considered to be sound in terms of compliance with the NPPF and the CIL Regulations. However, criterion (4) of Policy SP6 requires sports facilities to be provided in this development line with standards established in the Local Plan which is inconsistent. This is likely to cause confusion about how provision for sports facilities should be made in this development and which policy takes precedence (PSLP63, Sport England) • This development will, in essence, become a dormitory location for people employed in London, Harlow, Bishop's Stortford, Saffron Walden or Cambridge (PSLP2403, Thaxted Parish Council) • It is indicated that it would be serviced by an access point at the major junction on the A120 adjacent to Highwood Quarry. The theory presumably is that the A120 would be used to link to the M11 going either north or south. In
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	<p>reality however, given the congested nature of the two-lane M11 northbound, commuters and other traffic destined for Saffron Walden or Cambridge is more likely to take the short-cut via the Tesco roundabout and the new Woodlands link road to the B184 and through Thaxted (PSLP2403, Thaxted Parish Council)</p> <ul style="list-style-type: none"> • We support this proposal in principle, but on the basis of a much more rapid rate of development than the Local Plan implies, in order to build a critical mass sooner rather than later, ensure or at least encourage the earlier provision of services and facilities, and remove the uncertainty about the eventual size of the development in the very long term. • Beware of unexploded buried bombs from 2nd world war!! • The policy as written does not fully reflect NPPF para 174 which requires LPAs to “promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity (PSLP830, Essex Wildlife Trust) • The B1256 cannot cope with extra traffic. • The policy should be amended to mention equestrian access. Including providing new routes, protecting existing routes. Any links to the Flitch Way should be definitive bridleways. • The separate identities of Little Canfield and Takeley have prejudicially not been included in this statement. There are concerns about coalescence with Little Canfield. Traffic flows from Easton Park will affect Takeley (PSLP2352, Takeley Parish Council) • Compulsory Purchase Orders should not form part of the strategic planning in the Local Plan (PSLP2352, Takeley Parish Council) • Connections to the Flitch Way could have a very detrimental effect on Hatfield Forest (PSLP2352, Takeley Parish Council) • Concern over DPDs being issued after the plan is adopted. Detail and infrastructure needs to be known in advance (PSLP2344, Takeley Parish Council) • The exact nature and scale of the contribution and subsequent expenditure by the NHS body responsible at that time, will be calculated as and when schemes come forward over the plan period to realise the objectives of the Local Plan. Anticipated impact: New Primary Healthcare facility essential. Great Dunmow is being considered for options to provide multi-service facility. (PSLP2581, West Essex CCG) • Major adverse harm to heritage assets and the loss of identity of the Little Easton Conservation Area (PSLP2346, Little Easton Parish Council) • Adverse harm to landscape areas of high sensitivity (PSLP2346, Little Easton Parish Council) • The proposals divide the village of Little Easton and cut off access for 25 residential properties to the rest of the village (PSLP2346, Little Easton Parish Council) • Phasing of development to the north will worsen the harm to the most sensitive areas of landscape and settings of heritage assets (PSLP2346, Little Easton Parish Council) • The presence of a restrictive covenant on 660 acres of land at Easton Lodge, specifically set up to prevent development of the land, is a risk to plan delivery as it could deter potential developers from coming forward or delay delivery of the housing numbers through future legal action by residents (PSLP2346,
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	<p>Little Easton Parish Council)</p> <ul style="list-style-type: none"> • The process should identify suitable sites for a new town rather than rely on developer submissions. • An agreement signed between the Rural District Council of Dunmow and the executors of the Countess of Warwick in 1939 limits development on Easton Park to ten dwelling houses. This agreement remains extant and UDC as the successor local authority remains bound by it. • The potential for slippage in the housing trajectories is significant. • By only meeting top-up shopping needs the development is unsustainable. • There are significant concerns regarding the development at such close proximity to the gardens of Easton Lodge as well as to the Little Easton Conservation Area and nearby listed buildings, in particular the Grade II* listed Stone Hall and Easton Glebe, all of which respond to a wider rural setting which contributes positively to their significance. Further encroachments into the setting of the HAR registered park and garden and its associated listed buildings would further erode its significance and relationship with its surroundings, and could potentially limit opportunities to re-establish links between the disparate elements of the former Easton Park Estate. (PSLP1835, Historic England) • The boundary of the Little Easton Conservation Area is particularly defined by a line of trees which sits within the currently open landscape and there is concern that the impact of the proposed development upon the conservation area would be severe. There is similar concern over potential impacts to the significance of the setting of the registered park and garden (views across countryside to the north). The open nature of the landscape is of value as it serves to inform the character of nearby listed buildings, the registered garden and the conservation area (PSLP1835, Historic England) •
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Amending the proposed Garden Park proposals ensure that the ancient woodland within it is protected and given adequate buffering from any surrounding housing or other development (PSLP818, the Woodland Trust) • To make this Plan sound, we ask that this Policy is amended to include all users and therefore be consistent with the stated Garden Community Principles at Appendix 4, and that ALL new routes are created as multi-user routes accessible to all vulnerable road users including equestrians and the disabled, rather than the default option which tends to only cater for pedestrians and cyclists. It is simply not acceptable to discriminate against one user group when public money is being used to create such infrastructure (PSLP625, Flich Way Action Group) • In this year that commemorates 100 years since the end of The Great War wouldn't it be wonderful if Uttlesford District Council could work with the landowners to set aside the land as a commemorative forest? I have seen Brown Hare, Badgers, Lapwing, Barn Owl, Yellowhammer, Skylarks and hedgehogs in the area, to name but few and on the ground there are orchids. I would like to propose that the area of land designated as land to build Easton Park, which will cover about the area of Hatfield Forest, be set aside for the people of Uttlesford to enjoy as it is or improved for wildlife. • Easton Park should be removed from the Local Plan. • There should be no new housing at Easton Park, but rather that Easton Park should be developed as the nature reserve intended by the Countess with increased access for the public.

	<ul style="list-style-type: none"> • Section 21 of the policy relates to wastewater infrastructure requirements. Given the changes to the approach to the delivery of water and wastewater infrastructure that came into effect in April 2018 it is considered that Section 21 of Policy SP6 should be revised to read: “Ensure that no phase of development is occupied until any necessary upgrades of the Enhance the appropriate water recycling centre have been delivered together with any necessary sewerage network reinforcement works., informed by the Uttlesford Water Cycle Study. The delivery of smart, innovative and sustainable water efficiency/re-use solutions that fosters climate resilience and a 21st century approach towards water supply. Developers will be expected to engage with wastewater infrastructure providers to agree an phasing and infrastructure delivery plan to ensure any Provision of improvements to waste water treatment and off-site drainage improvements are aligned with the phasing of the development within the plan period and that proposed post 2033.” (PSLP2583, Thames Water) • To be effective it is suggested that the first and second sentences of paragraph 21 of the policy relating to foul drainage should be brought together to make it clear what is the requirement for the applicant and the decision maker at the planning application stage for both the foul sewerage network and receiving Water Recycling Centre. As current drafted the wording appears to overlap the requirement to demonstrate that there is sufficient capacity available in time to serve the development (PSLP2513, Anglian Water) • In respect of aerodrome safeguarding matters, given the issue is a repeated risk across a number of elements, it is considered that an overarching caveat is inserted into the introductory paragraphs of the main policy text. For example: “The Strategic Growth Development Plan Document will set out the nature and form of the new community. The DPD will be produced in consultation with stakeholders and will include a concept plan showing the disposition and quantity of future land-uses, and give three-dimensional indication of the urban design and landscape parameters which will be incorporated into any future planning applications; together with a phasing and implementation strategy which sets out how the rate of development will be linked to the necessary social and physical infrastructure to ensure that the respective phases of the development do not come forward until the necessary infrastructure has been secured. The DPD, and any future planning applications, will also demonstrate how aerodrome safeguarding considerations have been incorporated into the overall design of the new garden community to ensure that any development does not impact upon the safe and efficient operation of aircraft at or in the vicinity of London Stansted Airport” (PSLP1507, Manchester Airport Group) • Change Policy SP 6 to take account of the SSSI Impact Risk Zones. There should also be recognition of the appropriate buffer zone identified and established in collaboration with Natural England. This SSSI must remain connected with other areas of habitat (PSLP891, Essex County Council) • Policy SP 6 refers to rapid transit priority measures. The recommended amendment refers to the need to provide the physical infrastructure for rapid transit within the new communities and wider afield. Consequently, amend ‘measures’ to ‘networks and connections’ as this form of wording is most appropriate to context and purpose (PSLP890, Essex County Council) • Policy SP6 bullet point 17 Change bullet points to read: “Enhance wider green infrastructure and networks including its maintenance,
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	<p>as well as the maintenance and enhancement of existing watercourses, ponds and lakes within the site.”</p> <p>Include an additional bullet point as follows:</p> <p>“Demonstrate the environmental net gains, and where there is a net loss from the development to provide provisions through offsetting.” (PSLP886, Essex County Council)</p> <ul style="list-style-type: none"> • Change Policy SP 6 by adding the following as an additional point or an amendment to a relevant bullet point: “Provide linkage of green infrastructure to the wider public realm to create green corridors and to improve accessibility for all and develop new links, utilising other components of urban greening.” (PSLP883, Essex County Council) <p>UDC should provide appropriate clarification on this matter in the Draft Plan before submission; and employment floorspace allocations and/or employment land requirements included in Policies SP 6, SP 7 and SP 8 (PSLP880, Essex County Council)</p> <ul style="list-style-type: none"> • Delivery timescales should also be reviewed to allow a more realistic programme for the DPDs and the necessary development management processes to take place; one might expect a start around 2025 to be more realistic. • It is requested that Policy SP6 is amended to make clear that opportunities for strategic growth or complementary uses will also be considered on adjoining or wider land areas such as our client’s land. This may for example include scope for linkages between the community and Stansted Airport, aiding sustainable development and providing opportunities for further social, economic and environmental benefits. • Policy SP6, Paragraph 7: "Incorporate from the early stage of the development of the garden community a package of measures to provide transport choice, including good connectivity to Stansted Airport and Great Dunmow. This should be provided by means of high quality and frequent bus services or may alternatively include a direct, dedicated link between Easton Park and Stansted Airport and between Easton Park and Woodside Way. A network of direct, safe walking and cycling routes to enhance permeability.....“ (PSLP2608, Landsec) • In relation to Point 9 we do not consider that any contributions are valid to A120 improvements, as the Transport Study states that the A120 is not in need of improvement in this location. Therefore this requirement should be removed from the policy. Further details on this point are provided below under the IDP heading. Reference to contributions to M11 Junction 8 should be expanded to confirm that any requirement for contributions will be in accordance with the CIL regulations or the regulations current at the appropriate time (PSLP2608, Landsec) • Also in relation to Point 9, while Landsec fully supports the protection of existing residents along Park Road, the access strategy for Park Road is yet to be fully designed. As there may be short sections where some Easton Park traffic uses short sections of Park Road, we request that the wording is amended as following: “Access to Park Road will be managed so that motor vehicles from the Garden Community do not pass through existing communities on Park Road” (PSLP2608, Landsec) • Point 25 refers to the potential to use of compulsory purchase powers to facilitate delivery of the Easton Park Garden Community, where this cannot be achieved by agreement. It is unclear what agreement the policy refers to, and
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	<p>the circumstances in which this policy might take effect. If it is linked to the determination of the appropriate delivery model, as referred to in Policy SP5, we consider this should be removed from the plan, as it is not a land-use planning matter, or better defined in line with our comments above (PSLP2608, Landsec)</p> <ul style="list-style-type: none"> • Paragraph 3.86 of the supporting text, states that in addition to producing a DPD for Easton Park, a local economic strategy will be established. It is unclear the purpose of the strategy, how it will relate to the DPD, the content, and the timing for its production. This should be clarified in the plan (PSLP2608, Landsec) • Additional allocations, should be included in the Local Plan to help ensure that delivery is maintained through a wider distribution of sustainable sites across the district. • Criterion (4) should be amended along the following lines: Provide allotments, open space, sports facilities, play, leisure and recreation in line with the most up-to-date Sports Strategy, standards established in the Local Plan, the Essex Design Guide and the Strategic Growth Development Plan Document (PSLP63, Sport England) • Thaxted Parish Council would also insist that as a preventative measure weight restrictions be imposed on the B184 through Thaxted preventing large delivery and construction vehicles from using this route (PSLP2403, Thaxted Parish Council) • It would however be very much more sensible in our opinion, to develop new housing on the sites that were proposed under the ‘Call for Sites’ around Birchanger. Here traffic would be almost bound to use the motorway routes. (PSLP2403, Thaxted Parish Council) • Thaxted Parish Council are asking for protection against the traffic impacts in relation to the Proposed Eastern Park Development by making the road junction such as that the traffic can only go on to the A120. (PSLP2403, Thaxted Parish Council) • The policy should include a clear commitment to the provision of coherent ecological networks and to the delivery of measurable net gains in biodiversity (PSLP830, Essex Wildlife Trust) • All new routes should be multi-modal, including for equestrians. • We suggest the addition of the words “a round” or “up to” before 10,00 homes (PSLP1835, Historic England) • We consider there may be further work needed to tighten the policy wording and to more accurately reflect the outcome of the HIA once it is finalised. In the mean time we offer the following comments: (11) delete “substantially”; insert “and its setting” after Lodge. (13b) include assets grade II* Easton Glebe and Stone Hall. (13b and 14) Re-order / reword to avoid repetition. (14) Delete “close to the site”. (15) Should this number be here? (PSLP1835, Historic England) • We continue to suggest the inclusion of a concept / strategy diagram to illustrate the main features of the policy. Including access points, location of heritage assets, buffer zones for heritage assets, strategic planting and other key considerations (PSLP1835, Historic England)
Policy SP7 North Uttlesford Garden Community	
SUPPORT	35
OBJECT	698
SUMMARY OF	<ul style="list-style-type: none"> • Interest in potential impact on Strategic Road Network especially the

<p>REPRESENTATIONS IN SUPPORT</p>	<p>M11/A120. Highways England heavily involved in the transport evidence base and support enhancement to public transport/sustainable mode offer across the district and the garden village developments. Essential for all development especially garden villages housing comes forward along with schools, Surgery's, other health care provision, shops, jobs, public transport and other infrastructure as demand arises (PSLP3027 Highways England)</p> <ul style="list-style-type: none"> • Support the text on flood risk within the utilities section that the communities will provide Sustainable Urban Drainage systems to provide water quality, amenity and ecological benefits as well as flood risk reduction (PSLP2921 Environment Agency) • Husband works in Great Chesterford, but due to house prices have had to move away from the area/want to move back and be around friends again. • Welcome new infrastructure proposed as the schools are all over subscribed and a new school would ease pressure/bring more jobs to the area. Support the green garden town approach introduced to your plans. • Better than multiple housing estates popping up around the area without the above infrastructure and green areas laid out • Helps future generations to stay within the area instead of being forced out due to lack of affordable housing, jobs etc.
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • Criterion (4) broadly welcomed for ensuring that adequate provision is made for community sports facilities but not consistent with the content of policy INF2 - most up-to-date Sports Strategy but (4) requires sports facilities to be provided in line with standards established in the Local Plan (PSLP64 Sport England) • Waste Water - pleased first part of Water Cycle Study has identified that there are technical solutions for foul water flows for the garden communities/need statement on protecting water quality/options for meeting the challenging targets required. Due to river headwaters expect part two of the Water Cycle Study to address the challenges of permitting for extensions or changes to WRCs (PSLP2921 Environment Agency) • Ensure policies will not have an adverse impact on healthcare provision over plan period/appropriate mitigation where healthcare service capacity insufficient to meet the needs/ NHS body determines exact nature and scale of contribution (West Essex Clinical Commissioning Group PSLP2580) • Sewerage undertaker generally supportive of the requirements on foul and surface water drainage outlined in Policy SP7 for NUGC. However requirements for foul drainage and sewage treatment duplicated in first /second sentences of para 18 of the policy/amend i.e. first 2 sentences of paragraph 18 brought together to make it clear what is the requirement for the applicant and the decision maker at the planning application stage for both the foul sewerage network and receiving Water Recycling Centre (PSLP2514 Anglian Water Services Ltd) • The A505 Corridor Improvement Feasibility Study: A10 to A11, Jan 2018 goes some way to addressing issues on cumulative impacts/continue to discuss with the two authorities and Herts County Council/amend to ...Contributions towards capacity improvements AND OTHER APPROPRIATE MITIGATION MEASURES along the A505 CORRIDOR and junction of the A505 and A1301 will be SECURED ..." (North Hertfordshire District Council PSLP2507) • Include requirement for detailed impacts assessment of designated sites, including Hildersham Wood SSSI, Alder Carr SSSI, Furze Hill SSSI and Nunn Wood SSSI, air and water quality impacts identified via SA/landscape-scale net

	<p>biodiversity gain/positive contribution to the Essex Living Landscape initiative. Also promote the conservation, restoration and enhancement/include explicit requirement for development to protect best agricultural land (Natural England PSLP2454)</p> <ul style="list-style-type: none"> • Welcome criterion (4) providing leisure/recreation as basis for adequate community sports facilities in Garden Community but reference to plan standard not consistent with Policy INF2 – that refers to most up-to-date Sports Strategy (Sport England PSLP64) • Policy SP7 to highlight the potential opportunity for improved train services at Great Chesterford as a result of Crossrail 2 and how this could help enable development and increase sustainable travel options in the proposed new garden community (Transport for London PSLP2117) • Not fully in accord with NPPF para. 174 requires to promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity (PSLP831 Essex Wildlife Trust) • Include employment floorspace allocations and/or employment land requirements/provide clarification in Policy and employment floorspace allocations and/or employment land requirements. Supportive of bullet points 4/5 but also consider connectivity to these green and open spaces, allotments and recreational facilities to ensure that access to green spaces is as easy as possible/add Provide linkage of green infrastructure to the wider public realm to create green corridors and to improve accessibility for all and develop new links, utilising other components of urban greening. Policy SP7 bullet 15 expand to include the maintenance plan for all green infrastructure and not only maintenance and enhancement of existing watercourses, ponds and lakes/ change to “the environmental net gains, and where there is a net loss from the development to provide provisions through offsetting” • Amend Para 3.101 that cap on housing numbers will be monitored and reviewed/supported by the evidence base/change to “proposed that beyond the end of the plan period, a cap of 3,300 new homes is placed on any allocation at North Uttlesford Garden Community to ensure that development over this figure does not take place until strategic highway improvements have been implemented. This will be considered through the on-going monitoring and future review process of the Local Plan and its supporting evidence base” (Essex County Council PSLP881 PSLP884 PSLP887 PSLP894) • Criteria 6/8 requirement for NUGC to provide frequent and fast public transport services aligns with Combined Authority ambition for high quality transport solutions for its area’s residents/businesses as set out in its 2030 Ambition document. Agree with requirement in the Policy for co-operation with authorities in Cambridgeshire, and cross-boundary agreement on any contributions. The Cambridgeshire and Peterborough Combined Authority is currently funding a number of studies that may inform that co-operation, including an A505 Study, a strategic review of Bus Services, and feasibility work for a Cambridge Autonomous Metro. As these studies are still ongoing at this stage we are not able to provide a specific response on transport implications but welcome the commitment to engage on those issues through the Development Plan Document (Cambridgeshire and Peterborough Combined Authority PSLP892) • Add reference to creation of multi-user routes/equestrian access Paragraph 6 (Essex Bridleways Association PSLP400)
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	<ul style="list-style-type: none"> • Of the three proposed garden communities, this strategic location in the London-Cambridge Growth Corridor well supported by good road and rail connections to major sub-regional centres of employment (eg Cambridge and Stansted Airport)/very close proximity to the existing employment hubs of Chesterford Research Park and the Genome Campus, so there is the potential for residents of the new settlement to live within cycling / walking distance of their employment. But close proximity of housing and jobs relates only to specific sectors and without a balance of local provision in a wider range of sectors there is a high likelihood that the principle of self-containment will be unattainable. Area has high sensitivity to change/visual impact of the development on nearby villages would be extreme (CPRE Essex PSLP2310) • Area of exceptional scenic beauty. This is an area of rural fields and hills where possible to feel remote from the A130 (Linton) side and the M6 to the west. It is an area beloved by walkers. Large loss of good productive agricultural land. New settlement be built on prominent high land instead of low lying ground. Light pollution from the settlement would be particularly obtrusive over large distances, especially to west in South Cambs. Distant from Essex's urban towns. The extra road traffic would overwhelm the capacity of local roads. The flow of water from a hillside settlement affects drainage into the villages. Hinxton and Duxford already subject to flooding (PSLP2559 CPRE Cambridgeshire & Peterborough) • Rapid Transport System should link settlements with places of work and retail centres if it is to replace private transport to any significant extent. A system which terminated at Stansted Airport would not achieve a significant transport mode shift . No exit onto the A11 so all the traffic would need to exit the settlement on the road to Saffron Walden (Sustainable Uttlesford PSLP2978/PSLP1441 • Infrastructure/influx of population as a result of the new settlement. The services and transport network across the surrounding areas will not be able to cope with increase, which is already under significant strain and combined with Wellcome Genome Campus development will worsen. Effects on historic (it neighbours onto a celtic settlement) and rural environment. Many other unique environments ,buildings and properties which will be harmed and their safeguard needed in policies. It will significantly affect environment visually and for wildlife (PSLP2424 Little Linton Farms Partnership) • The site has limitations/constraints on accessibility. More on sustainable measures outside the site/Northern Gateway. The scheme could address these by adopting a number of measures (Abington Park Farm PSLP2924) <p>South Cambridgeshire District Council</p> <ul style="list-style-type: none"> • Focus on ensuring plan compatible with interests of South Cambridgeshire in the short term/early preparation of joint Greater Cambridge Local Plan • Particularly NUGC with the continued economic success of the southern economic cluster in South Cambridgeshire <p>Advantages;</p> <ul style="list-style-type: none"> • Homes at NUGC help to serve the southern employment cluster - Cambridge Biomedical Campus to Wellcome Genome Campus and Granta Park/Babraham Research Campus • Provide homes close to significant jobs existing and proposed in the southern employment cluster, where limited new housing is proposed in the emerging South Cambs Local Plan • South Cambs could take opportunity to discuss with UDC under duty to
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	<p>cooperate, how housing beyond the plan period would be apportioned in future local plans in view of function acknowledged in UDC evidence that it would play in providing housing close to jobs in South Cambs. Such discussions have not taken place. Even if numbers not formally counted towards Greater Cambridge, NUGC would perform role in serving southern employment cluster/inform future development strategy for Greater Cambridge.</p> <ul style="list-style-type: none"> • NUGC’s potential to provide local secondary education capacity close to the proposed Wellcome Trust Genome Campus development for 1,500 new homes (if planning permission granted). <p>Disadvantages:</p> <ul style="list-style-type: none"> • The plan relies on a strategic solution to A505 being delivered to enable the full delivery of the new settlement beyond the plan period, to which there is currently no commitment by the highway authority. Local Plan has 1,925 homes in plan period but questions the robustness of evidence supporting delivery of the new settlement as a whole/not be sustainable development if only part of the new settlement delivered. • Early years of delivery rely on taking up limited capacity/could have impacts on the continued delivery of jobs at existing campuses in South Cambridgeshire in the southern employment cluster. • Wellcome Campus is also developing proposals for a major expansion of the campus and a planning application is anticipated to be submitted this year. The Wellcome proposal will clearly need to be considered on its merits weighing all material planning considerations. The southern cluster is of key importance to the local and national economy. Indeed the Independent Economic Commission in its interim report to the Combined Authority advised that continued success in Greater Cambridge will be essential as part of the ambition to double GVA in the Combined Authority area. • Local traffic problems for nearby South Cambs villages, especially before major A505 improvements are implemented, by traffic ‘rat-running’ through village roads to avoid A505 • An acknowledged landscape impact for South Cambridgeshire given location of new settlement on rising land to the south-east of the A11. • Parallels with North Essex Plan/more certainty on truck road upgrades • Main interest housing close to jobs but transport/landscape impacts not fully resolved • Supports UDC meeting AON but only if accompanied by infrastructure • Uncertainties in provision/funding of additional transport capacity in A505 corridor/S Cambs objects until certainty • Distinct from Cambridgeshire County Council response to UDC transport evidence (reasonably content) • South Cambs supportive of need for an A505 corridor scheme but assuming capacity solutions found not delivered for some years • Deal with either by limiting SP7 to 3300 dwellings or safeguard site for future development/pursue via early plan review • Other potential alternatives without above constraint • Full settlement not deliverable without A505 improvements • Poorly served by public transport/employment/commuting • Need traffic calming measures/strengthen SP7 wording in para 8 • Sustainability appraisal does not take commuting impacts or delivery of transport infrastructure into account
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<ul style="list-style-type: none"> • Constrains scope for growth of key employment centres • Plans should allocate land with the least environmental value or amenity value where consistent with other policies • Significant adverse impacts of sustainability should be avoided and where possible alternatives with less impact pursued/significant transport and landscape impacts • UDC landscape work omits impacts from North Western slopes • Revised NUGC could reduce its harm by avoiding development on the north, west, and eastern edges on the high plateau subject to landscape mitigations, sensitive street lighting/building heights, avoiding slopes facing A11 • If above reduces number of homes UDC should consider amended southern boundary • Sustainability appraisal does not take light pollution into account • Impacts on water supply for Cambridge/South Cambs not assessed • Unclear if secondary school can be delivered/impact on South Cambs • Build out rates too optimistic • Impacts on South Cambs electricity supply possible <p>Options</p> <ul style="list-style-type: none"> • Amend Policy SP7 to include a cap on development at 3,300 dwellings; although assumes not to enable further development in the southern cluster/uncertainty over full deliverability of the new settlement as a whole remains. • Alternatively amend to safeguard the site for future development. If other challenges to the NUGC can be overcome or suitably mitigated so that the only uncertainty remains necessary transport infrastructure, the Local Plan could also include a policy commitment to an early plan review to take place once there is more certainty regarding transport capacity in and around the A505 corridor. Such an approach allows the Combined Authority to firm up its non-statutory spatial plan and its formal transport strategy for the Combined Authority area which will help to provide the policy context for the future of the adjoining parts of South Cambridgeshire (PSLP2689 South Cambs District Council) <p>(Historic England PSLP1849)</p> <ul style="list-style-type: none"> • Object to Garden Communities especially NUGC/site selection process/consider alternative site/ insufficient weight given to heritage • Maybe scope at Easton Park/West of Braintree although in principle objection to NUGC • Given rich historic environment at Great Chesterford significant inter-relationship between Roman Temple, Roman Town and Fort, prominent position, NUGC causes serious harm to historic environment • Welcome preparation of HIA/on-going work to finalise the HIA/once finalised this will need to inform the extent of the site allocation/Local Plan Policy • NUGC entirely green field site prominently located in a wide undulating landscape/long views of the site • Notes findings of UDC Brief HIA that landscape informs heritage assets' character, historical context and their setting • Note Draft HIA finds NUGC has potential to harm the significance of heritage assets • Welcome reference in SP7 to historic environment but this will need to be
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	<p>refined following completion of the HIA/look forward to continued working with Council</p> <ul style="list-style-type: none"> • UDC Landscape and Visual Appraisal conclude that land at Great Chesterford is of high landscape and visual sensitivity, given its steeply sloping landform and elevated position. • The report whilst mentioning the setting of the listed building on site (Park Farmhouse) makes no mention of setting of other heritage assets including the scheduled monuments and Conservation Area and associated listed buildings. • The more detailed Bidwells LVIA photomontage shows proposed development highly visible/would affect the setting of heritage assets and the wider rural landscape/further photomontages may be needed • Until HIA/policy wording complete difficult for Historic England to give a definitive view on the proposals therefore find unsound/result in severe harm to the character and historic significance of the area and would irreversibly impact upon the setting of nearby heritage assets. • Notwithstanding objection para 3.97 should include more detail on the heritage assets on site/wider area/appropriate treatment informed by HIA • Notwithstanding objection “around” 5000 dwellings/welcome section on the historic environment/may need to tighten reflecting completed HIA/ • Look forward to working with Council/remove duplication/bullet 2b to mention other heritage assets e.g. Great Chesterford Conservation Area/65+ listed buildings/Grade I All Saints Church/Grade II* Old Vicarage/SAMs – Roman And Anglo Saxon Cemeteries/Paddock Wood moated site. • Include a concept/strategy diagram to illustrate the main features of the policy/Garden Community such as access points, heritage assets, buffer zones/strategic planting <p>Great Chesterford Parish Council PSLP2316</p> <p>Introduction</p> <ul style="list-style-type: none"> • Dialogue with GCPC should have been earlier in the process/NUGC unsound/ SP7 fails Duty to Cooperate • Defective selection of NUGC site/came forward in 2015/subject to critical UDC officer assessment/GCPC submitted detailed comments in April 2016 but no response/GCPC excluded from effective consultation • Does not deal with climate change • Not deliverable over the plan period • Does not meet infrastructure needs • Need for 5 year land supply but protect Great Chesterford <p>Specific Objections to SP7</p> <ul style="list-style-type: none"> • High landscape and visual sensitivity/mitigation impacts detrimental to historic pattern character of the existing landscape • UDC reports recognise high landscape/visual sensitivity/cause harm/ suggest impacts could be mitigated, although would have detrimental effect on the historic pattern and character of the existing landscape. • Bidwells LVA wrongly applied landscape capacity methodology • HDA Landscape Assessment judged site to fall within areas with low/negligible landscape capacity to absorb development • Historic significance of area including Scheduled Monuments, make any mitigation incapable of preventing permanent damage • Full Heritage Impact Assessment recommended but not undertaken on built
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	<p>heritage and the setting of heritage assets</p> <ul style="list-style-type: none"> • Contains significant archaeology, from multiple phases, which would be subject to substantial harm as a result of development • Adverse impact upon setting of heritage assets and views • No evidence that impacts from proposal tested/mitigation planned • Only junction modelling/ignored capacity issues on route corridors • UDC's justification for NUGC is too reliant on its proximity to the M11/J9, the railway stations at Great Chesterford/Whittlesford Parkway/local employment opportunities • Routes around Great Chesterford under stress by 2033 • Severe congestion on the A505, A1301 and B184 but no improvement proposals for principal routes • Great Chesterford Rail station inadequate for more usage/Whittlesford unsuitable/reliant on Audley End rail station • Walking/cycling from NUGC is unrealistic • No evidence for WYG 10%/15% modal shift in transport impact • Unachievable sustainable transport policy/mode targets over ambitious • Supports non-car modes only if a realistic prospect of delivery/rural area with low existing usage/RTS needs directness/convenience over car • No Northern access agreed with highways authorities/acquisition of third-party land/enhancements not agreed at Stump Cross use of Park Road makes rat-run to Great Chesterford railway station/Audley End station within the village • Require additional highway access point, preferably to the A11 • Access limitations on Park Road need to be clearly specified • Does not meet SEA objectives 9 (transport) /12 (housing needs). • In rural location distant from major towns/evidence such locations have more travel distances compared to urban or edge urban areas • Insufficient detail on impacts/mitigation, future DPD ineffective • Traffic contributes to CO2/PM10 emissions regardless of reduction in private car use from sustainable transport measures • Inadequate proposals regarding Water and Flooding • Lack of appraisal of Genome expansion/other developments that may impact • Inadequate Sports and recreational facilities proposals • List of specific elements that should not be dealt with in future DPD including details of infrastructure, phasing, transport, water supply <p>Red lines/changes required to SP7</p> <ul style="list-style-type: none"> • Specific mix of sizes, types and tenures/affordable rent/older peoples housing/peppercotted/phased • Range of local employment opportunities maximising links to Genome/Chesterford Research Park/interspersed with residential/education/walking environment • New local centre, mix of retail/offices/community uses, phasing restriction • SAM protected/ interpretive facility provided • Four primary schools/one secondary in advance of need, walking/cycling routes to Great/Little Chesterford, B184 crossing • Early years/childcare/health facilities/community centres in advance of need • Should be integrated with residential areas • Transport choice needed including, fast/frequent public transport to towns/facilities/ nearby employers/Whittlesford Station/before any dwellings • Network of safe walking/cycling routes to Genome/Whittlesford
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	<p>Station/Chesterford Research Park/Saffron Walden/phasing restriction</p> <ul style="list-style-type: none"> • Access Strategy/northbound connects to A11, A1301, [Fourwentways] P&R/A1307 corridor • New vehicular access to site from Granta Park otherwise all vehicular access off Field Farm Drive • No vehicular access to Park Farm or Cow Lane • Traffic mitigation on B184/B1383 before development • New network/primary substations, upgrades/reinforcements in short term • Enhancements to WRC/new connections • Provide natural/Semi natural/amenity space/allotments/open space/recreation facilities • Positively respond to landscape/historic value of site/proposals influenced by LVAs and HIAs, impact on existing villages, not building on visible ridgelines. Improve degraded features, new woodland • Undeveloped/landscaped Buffer Zone 1.5km between Great Chesterford and any NUGC building <p>PSLP2696 Ickleton Parish Council</p> <ul style="list-style-type: none"> • Support South Cambs District Council objections • No evidence to support SP7 • Demand for housing is in South of district/need met by South Cambs proposals/60-70% to be affordable (50% rented) • Landscape impacts/upper slopes developed/night/winter views • No alternatives ever considered/little in plan period/much less environmental impact elsewhere • Transport impacts on rat running via villages, A1301,A505 and junctions, no modal shift, need one job per household • No secondary school/Loss of farmland/Flooding/Water Supply/Heritage impacts <p>PSLP2363 Whittlesford Parish Council</p> <ul style="list-style-type: none"> • Supports objections of other villages • Too dependant on Whittlesford Parkway Station/proposed Rural Travel Hub • Villages would become a rat run • Flooding downstream to all the villages/jeopardise water supply as water comes from boreholes in the chalk <p>PSLP2447 Great Abington</p> <ul style="list-style-type: none"> • No valid justification for selection of NUGC • Far away from UDC housing needs • Costs fall on South Cambs villages • UDC transport work takes no account of permitted growth in S Cambs • Little public transport/expensive • Dependant/limited parking at Whittlesford Station • Cycle route going towards Great Abington relies on private land <p>PSLP2444 Pampisford Parish Council</p> <ul style="list-style-type: none"> • In wrong place to house Essex residents and employees • Roads at capacity at peak times particularly the A1301/ A505 roundabout • IDP Schedules Garden Communities lists improvements but no timescale. • Citi7 bus only passes the site once an hour
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	<ul style="list-style-type: none"> • Greenfield site on rising chalk land/local settlements occupy valley positions/ out of keeping with historical aspect of area. <p>PSLP2372 Little Abington Parish Council</p> <ul style="list-style-type: none"> • Disproportionate development in relation to existing communities • Inadequate consideration of local transport infrastructure requirements Impact on environment/Lack of provision for schools/health & social care • Lack of collaboration and joint development of strategic vision with neighbouring local authorities <p>PSLP1699/PSLP1704 Linton Parish Council</p> <ul style="list-style-type: none"> • Commuter traffic adds to congestion on B1052/ A1307 The Grip/air quality & noise impacts/Linton college • Not sufficient jobs for the residents of NUGC • planning throughout region needs to be co-ordinated/include the Greater Cambridge /City Deal proposals <p>PSLP2277 Duxford Parish Council</p> <ul style="list-style-type: none"> • South Cambs Council have addressed its housing needs in Local Plan/five year housing land supply • Rat-running through the villages of Duxford, Hinxton and Ickleton • Limited parking at Gt. Chesterford Station/limited train service at this station means Whittlesford/Audley End used • Hourly bus service from Grt Chesterford to Cambridge takes over an hour • Flooding downstream in Cam valley/reduction in water entering water table • Impact on the view/light pollution across the area • Genome Campus proposal not considered • Adds load on transport infrastructure as children travel to Saffron Walden, Sawston or Linton in South Cambridgeshire • Lower paid staff at Genome/nearby employment sites not eligible for social housing provision <p>Thriplow Parish Council PSLP1884</p> <ul style="list-style-type: none"> • No valid justification for selection of NUGC/environmental harm caused/ /over-optimistic forecast of delivery <p>Little Chesterford Parish Council PSLP2341</p> <ul style="list-style-type: none"> • Only housing need from Stanstead Airport atypical numbers drives strategy of three garden communities • Heritage Assessments find that development cannot take place without damage to heritage assets • SAM cannot be protected/run-off washing it away/damage visual qualities of the landscape • Chesterford Research Park not growing/UDC own 50% • No evidence for cost per dwelling of infrastructure/£40K invalid • Roads at capacity • Genome expansion likely to be looked on favourably by Secretary of State • Not dealt with separation of communities • The site is of high landscape and visual sensitivity <p>PSLP2407 Littlebury Parish Council</p>
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	<ul style="list-style-type: none"> • Until supporting infrastructure in place NUGC residents will travel to use local services in Saffron Walden and the rail station at Audley End. • School places will be at Saffron Walden, Newport, Stansted possibly Great Dunmow/Great Dunmow too far so quickly need additional school places • Traffic on B1383 route already heavy/speeding/safety issues. Accidents regular Littlebury to Audley End stretch. Reduce speed limit through Littlebury to 20 m.p.h/traffic calming measures. Upgrade to M11J9 needed • Landscaping of native species/wildlife corridors. <p>PSLP2381 Ickleton Society</p> <ul style="list-style-type: none"> • High housing number not needed • Only meets Cambridge commuters housing needs • Quality of the housing will not soften its impact • A full transport assessment has not been undertaken • Assertions about non-car travel not based on factual evidence • distances for walking or cycling are too far for most people • Direct access northbound to the A11 and at M11/J9 and southbound exits a condition for NUGC • Garden Cities only where existing rapid public transport links to major cities, or plans for provision in place • one of the driest areas of the country • water from sewerage works flows into the River Cam increasing the risk of flooding downstream • NUGC not able to support a secondary school since it cannot grow beyond 3300 houses unless the A505 is dualled <p>Residents</p> <p>Those who support with changes</p> <ul style="list-style-type: none"> • Some Great Chesterford residents support the new settlement to get decent, affordable housing/infrastructure but concerns over Garden City Principles not met/land value capture/CPO/achieving 60% non-car modal share (PSLP1063 Mr Simon Witney) <p>Alternatives</p> <ul style="list-style-type: none"> • Better alternative would be Audley End or Whittlesford Station with latter having good access to Strategic Road Network • Does not meet Garden Community principles for 50% self-containment • Not self-sufficient/depends on Saffron Walden's facilities • Typical mixed employment in Saffron Walden • Separation of communities /sense of place /community cohesiveness. • Put the 5000 in Saffron Walden along with a new bypass • No major retail/services in GC centre/remotely from rest of Essex • Genome/other centres already provide for housing needs • Commuter suburb of Cambridge/London no employment/drawing in residents rather than providing for UDC housing needs • Putting 10 dwellings in every village would meet the need instead • Worsens affordability process with people vital to the area are priced out • Proximity to Cambridge makes it one of the least affordable locations in the county/meeting affordability needs too challenging • No housing need in north of district/not in HMA/aging population /no affordable or rentable properties/does not meet local needs
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	<ul style="list-style-type: none"> • Each village could take a small amount of houses • Will be purchased by those wanting a slightly cheaper option than Cambridge and so does not help local/young people in UDC • Cambridge City/South Cambridgeshire Councils Plans provide for housing to support the growth in adjacent key industries in their • South Cambs/Genome have already planned for areas housing needs • Not in Strategic Housing Market Area/does not meet local needs • Not most appropriate strategy or deliverable over plan period <p>Landscape</p> <ul style="list-style-type: none"> • County Park needed • Haven for birds, hares, badgers, deer endangered hedgehogs • View from Coploe Hill destroyed • In open countryside, with high detrimental visual impact, obliterate an area of natural beauty • Very visible to the surrounding areas and cannot be developed without causing harm to the wider landscape • New town bigger than Saffron Walden/ new conurbation close to Saffron Walden/no self - containment • Eyesore on hill/completely out of character/loss of agricultural land • Highly visible from South Cambs/opposite side of sensitive Cam Valley (Looking from Strethall/Catmere End), even if building is mainly on the plateau. • Permanently destroy the uplands, the sky-line, good quality agricultural land and add to urbanisation of a rural landscape • All North West Uttlesford's character will be destroyed <p>Infrastructure</p> <ul style="list-style-type: none"> • Schools, GP surgeries, transport improvements before development • Duxford/Great Chesterford primary schools already over capacity • Essex County Council will not pay for any infrastructure/late provision of secondary school in the plan • Chesterford GP practice expanded by about 10% a year recently • Parents will move as close as possible to their preferred school • Early provision of a new primary school in NUGV essential • Genome Campus expansion (1500 homes/175k sqm offices) but no collaboration on resolving infrastructure issues i.e. schools, doctors • Costs in traffic, landscaping, increased flood risks, aquifer damage, light pollution, heritage and infrastructure mostly met by the surrounding villages in South Cambridgeshire <p>Transport</p> <ul style="list-style-type: none"> • Rapid Transport System must link settlements with places of work and retail centre/not terminate at Stansted Airport/cost of billions • Traffic calming essential for Littlebury • Newmarket Road A1383 cannot cope -too narrow/no pavements • Long existing bus journey into Cambridge • Too dependent on Whittlesford Parkway/Mcdonalds roundabout • No detail provided on the proposed cycling improvements NUGC traffic will make Saffron Walden's roads impassable • Access to the A11 should be precondition
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	<ul style="list-style-type: none"> • Proximity to M11 irrelevant/partners of residents do not work in the science clusters • Whittlesford Rural Travel Hub adds additional traffic through villages • No transport plans agreed with the highways authorities • Rat-running through Ickleton/Duxford already problem will worsen • Underpass near Great Chesterford level crossing accident black spot • Significant improvement to M11/local A roads before development • Illegal verge parking already frequent at Great Chesterford station • Larger train stations Audley End/Whittlesford already fill up • Far away from employment opportunities i.e. Stansted Airport/no facilities for many years/traffic heading to Cambridge for jobs and services • A1301/Sawston roundabout already overcrowded • No consideration to access from the A11 and the M11 • Sustainable alternatives to the A505/A1301 and B184 congestion problems not identified <p>Heritage/Archaeology</p> <ul style="list-style-type: none"> • Uplands based on last remaining hunting forest, ancient saxon burial sites crossing of the oldest pathway in the UK • Roman Temple has greater risk of flooding • Loss of prime agricultural land, threaten the ancient monuments, ancient woodland, Roman remains, and the Icknield Way • Local History and Archaeology not considered • Protect/provide green spaces/threat to Hildersham Wood SSSI <p>Water</p> <ul style="list-style-type: none"> • Concerns about water run off from the proposed new town increases the risk of flooding for Hinxton and downstream. • Threat to local water supply/aquifers/risk to natural run-off/flooding • In dry area/on aquifer/more flooding/ 55% impermeable surfaces. • Unmanageable traffic burdens on Hinxton/neighbouring villages with no prospect of mitigation • Whatever SUDS schemes used run off likely to be greater/South Cambs chalk aquifer cannot sustain any further abstraction <p>Other</p> <ul style="list-style-type: none"> • Intrusive for North Uttlesford crematorium • Contravention of the Human Rights Act/location's quiet enjoyment • Politically led at a national level yet huge local opposition <p>Welcome Trust PSLP2975</p> <ul style="list-style-type: none"> • Reasonable alternatives not considered/higher delivery in other GCs an alternative or West of Braintree/Easton Park/Chelmer Mead scenario better or more small sites mean NUGC not needed • Only considers sites submitted to UDC • Strategy does not seek to meet the Full AON • Sustainability Appraisal makes no conclusions on sustainability • Further assessment needed on water and heritage impacts especially mitigation • Full scale of NUGC not assessed or deliverable
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	<ul style="list-style-type: none"> • Over reliance on new settlements for delivery • IDP has no timings/no critical mass /no strategic transport solution identified • DPDs ineffective/North Essex plan not viably delivered • Cost of modal shift not included in Viability Assessment • No strategic solution identified for A505 • No employment minima in SP7 • No account taken of planning application for 1500 dwellings/rapid commencement • No housing need for NUGC/only provides for Cambridgeshire • Take account of 2018 NPPF • Need to focus new development where can reduce travel between homes, jobs and services and facilities and where alternatives to using car/reduces overall environmental impact • All three garden villages at top of Lichfields housing delivery range/ need additional sites early in plan period. (Village Developments Takeley PSLP2915) • Three garden communities presents risk to housing delivery/additional allocations needed to ensure sufficient housing land to maintain delivery during changing economic circumstances (Bloomhall PSLP187) • Focus on delivering two garden villages nearer employment locations/main road network (A120)allocate more smaller allocations (St Edmunds Lane Management Limited PSLP1809) • Access constraints/measures suggested Abington Park Farm PSLP2924 • While Garden Communities in addressing housing need is valid plan may not be effective given reliance on 60% modal shift (Grant and Bloor PSLP2899) • Fulfils housing needs of Cambridge housing market rather than the West Essex and East Herts market/concern of adjoining LPA notable. (Trustee of N Streeter Will Trust PSLP2867) • A unilateral move by UDC would risk the effective cross-boundary cooperation that currently exists (Endurance Estates PSLP2834) • Housing requirement of 14,600 dwellings (2011 to 2033) not based on a sound assessment of needs for Housing Market Area/ shortfall in housing supply/over reliant on GCs. LDS does not set timescale for DPD preparation/ allocate additional sites/delivered earlier in the plan . HMA underestimate housing need/increase housing requirement (Persimmon PSLP2672) • NUGC not justified/set out a range of concerns in relation to the delivery of this site within its response to Regulation 18 consultation that stand (Fairfield (Elsenham) PSLP2783) • UDC housing supply of 14,712 falls 258 units below its 14,000 dwelling requirement if West of Braintree GC does not happen/if other two garden communities do not happen or delayed the Council will fall below its housing requirements/must seek to improve its housing supply position (Chase New Homes PSLP2197) • NUGC not a suitable location for a new settlement/concerns surrounding deliverability/ serves housing needs of SCDC/ ability to deliver transport infrastructure to enable its development, greater certainty and commitment is needed over the provision necessary transport infrastructure in order to demonstrate that the garden communities which rely on the upgrades are deliverable in full/ no evidence 60% of all trips will be made by sustainable modes/does not commit to the delivery of a significant amount of employment (Countryside Properties UK Limited PSLP2765)
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	<ul style="list-style-type: none"> • NUGC has negative landscape impact/congestion on the local highways network/scored poorly against a number of the Sustainability Appraisal Objectives/negative impact on; water quality, the landscape, the areas heritage assets, potential for contamination and poor bus links. Meets housing needs of Cambridge not Uttlesford. Unlikely to be self-sustaining/policy does not commit to the delivery of a significant amount of employment/not located on train line /commuting by car to Cambridge (The Crown Estate PSLP2750) • Not a sustainable form of development due to the detrimental impact it will have on the human infrastructure together with the requirements for the flora and fauna (James Binney Will Trust PSLP1540) • No evidence why necessary to locate a Garden Communities in an attractive rural area or that the reasons for doing so outweigh the environmental harm that will be caused. Reliance on this and other Garden Communities to meet its OAN has not been adequately justified via the Sustainability Appraisal. Over-optimistic forecast of housing delivery prior to 2033 /absence of any connection with the delivery of transportation investment (Edward Gittins PSLP1860) <p>Grosvenor (PSLP950)</p> <ul style="list-style-type: none"> • Supports SP7 noting NUGC will deliver 5000 homes, local employment opportunities, and community infrastructure. • Strategic location in north of district for London Stansted Cambridge growth corridor, LSC Growth Corridor recognised by Government as a key location for economic and population growth in the South East/UDC located centrally within the Corridor, where housing pressures are significant/NUGC will play a vital role helping meet the housing/economic needs of Corridor; meeting housing needs in district, balancing growth between north and south of Uttlesford district • Support growth of UDC communities/job markets in north of district/recognise distinction in the work locations of residents in North Uttlesford compared to South Uttlesford, need alignment of housing growth with supporting employment • Utilises key infrastructure/sustainable transport, • NUGC's location benefits from excellent connections to the transport network including the Cambridge to London rail corridor, the M11/A11 strategic road network and emerging proposals for the Cambridge Autonomous Metro • Sustainable transport strategies can capitalise on the connections to thriving life science and research employment market, to help reduce travel distances and enhance existing transport options for public transport, cycling and walking; and • Support Cambs southern life cluster/Unique opportunity to provide housing for workers and create employment opportunities which support the life sciences, research and innovation sector • Economic role providing employment opportunities on a range of uses, providing location that supports key cluster. Social Role providing 5000 mix of homes meeting present and future needs, range of jobs, community infrastructure needs. Environment role assimilating development into landscape/structural planting, net biodiversity gains/minimal heritage impacts. • Support principle of set of development requirements that NUGC will accord
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	<p>with on landuses, transport, historic/natural environment, utilities, governance and stewardship</p> <p>Amendments to SP7/requirements;</p> <p>Para 2 para add <i>Deliver a range of local employment opportunities integrated into the new community comprising approximately 60,000 square metres of employment floorspace (B1a, B1b, B1c, B2, B8 and Sui Generis/delete Floorspace allocations to be defined within the Strategic Growth Development Plan Document.</i></p> <p>Para 3 Planning applications determined in accordance with the development principles set out in the DPD consistent with the approved DPD which will need to be in place before any consent is granted for the new Garden Community. and the requirements of Policy D4 – Development Frameworks and Codes.</p> <p>Paragraph 6 <i>Incorporate, from the early delivery phase of the garden community, a package of measures to provide transport choice, including the delivery of high quality, frequent and fast public transport connections to important on- and off-site generators of travel demand, to reduce the reliance on the private car. Saffron Walden, Cambridge, Whittlesford Rail Station, Audley End Rail Station, Great Chesterford Rail Station and nearby employment parks (including the Wellcome Genome Campus and Chesterford Research Park).</i></p> <p>Paragraph 6: A network of direct, high quality, safe walking and cycling routes will also be provided to enhance permeability within the site and to access nearby employment areas, transport hubs and communities. A range of opportunities will be explored through the development of the DPD to provide high quality walking and cycling links, for example improving links to <i>including linking the existing cycle path from Hinxton to Saffron Walden, and linking to Great Chesterford Rail Station and the nearby employment parks. via the PROW adjoining Great Chesterford to the North West of Jackson's Lane.</i></p> <p>Paragraph 8 <i>“amend Provide an access strategy that a strategy that offers connections with the A11, A1301 and the Cambridge Park & Ride being explored as part of the Cambridge South East Study (on the A1307), with the A11 being the preferred route for northbound travel.The development will avoid discourage the use of unsuitable roads by car through existing communities”.</i></p> <p>Para 3.100 3rd sentence add “Discussions will also be held with Highways England regarding a new access onto the A11 to the north of the site to ensure that the full range of options is explored. A northbound public transport, walking and cycling link to this destination has the opportunity to deliver considerable benefits to the scheme.</p> <p>Para 3.101 WYG’s vehicular trip assumptions for NUGC do not account for the high levels of internalisation within the site/22% rising to 40% for the full development scenario. Amount of development which could be accommodated is likely to be higher than the suggested 3,330 cap. Any restriction on development to be cognisant of transport conditions at the time.</p> <p>Paragraph 3.101 add “Based on the Local Plan traffic forecasts in the evidence base, the proposed developer funded highway improvements could accommodate up to 3,300 new homes at North Uttlesford ... Development beyond this level would need to be considered as part of a ‘Monitor and Manage’ approach to development to ensure strategic highway improvements depend upon strategic highway improvements to the A505 Corridor between the M11 and A11 comes forward at the right time. such as dualling of the A505 between M11 and A11 junctions. It is proposed that beyond the end of the plan</p>
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	<p><i>period, a monitoring strategy is identified and agreed with relevant stakeholders of 3,300 new homes is which will require the traffic impacts to be reviewed for significant additional phases of development based on the performance of the network at the time placed on any allocation at North Uttlesford Garden Community to ensure that development over this figure shown to have severe impacts.....</i></p> <p>Historic Environment</p> <p>1. . delete <i>The sense of tranquillity within the site should be maintained.</i></p> <p>3. <i>Conserve and where appropriate enhance the significance of heritage assets and their settings both within the site and the wider area. Where mitigation is required, measures will have regard to the HIA-Heritage Impact Assessment submitted with an application and include:</i></p> <p>4. <i>Conserve and where appropriate enhance the significance of heritage assets and their settings, both within the site and in the wider area. Where mitigation is required, measures will have regard to the HIA and include:</i></p> <p>Para 3.97 add “...evidence of potential for significant buried archaeology ... in the wider area. The HIA concludes A Heritage Impact Assessment will therefore be required with any application to demonstrate how future development will mitigate any potential impacts on, and where possible, enhance heritage assets within and surrounding the site.</p> <p>Natural Environment</p> <p>Acknowledge Land at Great Chesterford Landscape and Visual Appraisal, prepared by CBA (June 2017) identifies parts of the site have a sense of tranquillity which should be maintained.</p> <p>13. add Where appropriate, the sense of tranquillity within the site should be maintained.</p> <p>Paragraph 3.97: add “A Landscape and Visual Impact Assessment will therefore be required with any planning application to demonstrate how development will mitigate any potential impacts on, and where possible, enhance the landscape.”</p> <p>17. Ultrafast Superfast broadband will be provided ...</p> <p>19. Add “Sustainable Drainage Systems should also address the groundwater protection zone and flooding constraints and, where possible, provide betterment.</p> <ul style="list-style-type: none"> ● First sentence of paragraph 3.96: <i>This Local Plan sets out the principle of development at North Uttlesford within a broad area of search and identifies the form of the development...</i>
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> ● SP7 Criterion (4) refer to most up-to-date Sports Strategy recreation in line with the most up-to-date Sports Strategy, standards established in the Local Plan, the Essex Design Guide and the Strategic Growth Development Plan Document (PSLP64 Sport England) ● Add will not have an adverse impact on healthcare provision over plan period/appropriate mitigation where healthcare service capacity insufficient to meet the needs/ NHS body determines exact nature and scale of contribution (West Essex Clinical Commissioning Group PSLP2580) ● Bring together first 2 sentences of paragraph 18 to make clear the requirement for the applicant and the decision maker at the planning application stage for both the foul sewerage network and receiving Water Recycling Centre (PSLP2514 Anglian Water Services Ltd) ● Amend to ...Contributions towards capacity improvements AND OTHER

	<p>APPROPRIATE MITIGATION MEASURES along the A505 CORRIDOR and junction of the A505 and A1301 will be SECURED ..." (North Hertfordshire District Council PSLP2507)</p> <ul style="list-style-type: none"> • Include requirement for detailed impacts assessment of designated sites, including Hildersham Wood SSSI, Alder Carr SSSI, Furze Hill SSSI and Nunn Wood SSSI, air and water quality impacts identified via SA/landscape-scale net biodiversity gain/positive contribution to the Essex Living Landscape initiative. Also promote the conservation, restoration and enhancement/include explicit requirement for development to protect best agricultural land (Natural England PSLP2454) • Highlight potential opportunity for improved train services at Great Chesterford as a result of Crossrail 2 and how this could help enable development and increase sustainable travel options in the proposed new garden community (Transport for London PSLP2117) • Not fully in accord with NPPF para. 174 requires to promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity (PSLP831 Essex Wildlife Trust) • Include employment floorspace allocations and/or employment land requirements/provide clarification in Policy/employment allocations and/or land requirements. Bullet points 4/5 add Provide linkage of green infrastructure to the wider public realm to create green corridors and to improve accessibility for all and develop new links, utilising other components of urban greening. Expand bullet 15 to include maintenance plan for all green infrastructure and not only maintenance and enhancement of existing watercourses, ponds and lakes/ change to "the environmental net gains, and where there is a net loss from the development to provide provisions through offsetting" Amend Para 3.101 to "proposed that beyond the end of the plan period, a cap of 3,300 new homes is placed on NUGC to ensure that development over this figure does not take place until strategic highway improvements have been implemented. This will be considered through the on-going monitoring and future review process of the Local Plan and its supporting evidence base" (Essex County Council PSLP881 PSLP884 PSLP887 PSLP894) • Add reference to creation of multi-user routes/equestrian access Paragraph 6 (Essex Bridleways Association PSLP400) <p>South Cambridgeshire District Council - Options</p> <ul style="list-style-type: none"> • Amend Policy SP7 to include a cap on development at 3,300 dwellings; although assumes not to enable further development in the southern cluster/ uncertainty over full deliverability of the new settlement as a whole remains. • Alternatively amend to safeguard the site for future development. If other challenges to the NUGC can be overcome or suitably mitigated so that the only uncertainty remains necessary transport infrastructure, the Local Plan
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	<p>could also include a policy commitment to an early plan review to take place once there is more certainty regarding transport capacity in and around the A505 corridor (PSLP2689 South Cambs District Council)</p> <p>Historic England</p> <ul style="list-style-type: none"> • Remove NUGC/consider alternative site/give more weight to heritage • Notwithstanding objection para 3.97 should include more detail on the heritage assets on site/wider area/appropriate treatment informed by HIA • Notwithstanding objection “around” 5000 dwellings/welcome section on the historic environment/may need to tighten reflecting completed HIA/ • Look forward to working with Council/remove duplication/bullet 2b to mention other heritage assets e.g. Great Chesterford Conservation Area/65+ listed buildings/Grade I All Saints Church/Grade II* Old Vicarage/SAMs – Roman And Anglo Saxon Cemeteries/Paddock Wood moated site. • Include a concept/strategy diagram to illustrate the main features of the policy/Garden Community such as access points, heritage assets, buffer zones/strategic planting (Historic England PSLP1849) <p>Great Chesterford Parish Council PSLP2316</p> <p>Red lines/changes required to SP7</p> <ul style="list-style-type: none"> • Specific mix of sizes, types and tenures/affordable rent/older peoples housing/peppercotted/phased • Range of local employment opportunities maximising links to Genome/Chesterford Research Park/interspersed with residential/education/walking environment • New local centre, mix of retail/offices/community uses, phasing restriction • Protect SAM /provide interpretive facility • Four primary schools/one secondary in advance of need, walking/cycling routes to Great/Little Chesterford, B184 crossing • Early years/childcare/health facilities/community centres in advance of needs • Integrated with residential areas • Transport choice needed including, fast/frequent public transport to towns/facilities/ nearby employers/Whittlesford Station/before any dwellings • Network of safe walking/cycling routes to Genome/Whittlesford Station/Chesterford Research Park/Saffron Walden/phasing restriction • Access Strategy/northbound connects to A11, A1301, [Fourwentways] P&R/A1307 corridor • New vehicular access to site from Granta Park otherwise all vehicular access off Field Farm Drive • No vehicular access to Park Farm or Cow Lane • Traffic mitigation on B184/B1383 before development • New network/primary substations, upgrades/reinforcements in short term
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	<ul style="list-style-type: none"> • Enhancements to WRC/new connections • Natural/Semi natural/amenity space/allotments/open space/recreation facilities • Positively respond to landscape/historic value of site/proposals influenced by LVAs and HIAs, impact on existing villages, not building on visible ridgelines. Improve degraded features, new woodland • Undeveloped/landscaped Buffer Zone 1.5km between Great Chesterford and any NUGC building (Great Chesterford Parish Council PSLP2316) <p>Littlebury Parish Council</p> <ul style="list-style-type: none"> • Need additional school places quickly • Reduce speed limit through Littlebury to 20 m.p.h/traffic calming measures. • Upgrade to M11J9 needed • Landscaping of native species/wildlife corridors PSLP2407 Littlebury Parish Council <p>Welcome Trust</p> <ul style="list-style-type: none"> • Focus new development where can reduce travel between homes, jobs and services and facilities and where alternatives to using car/reduces overall environmental impact (Welcome Trust PSLP2975) <p>Other Landowners/developers</p> <ul style="list-style-type: none"> • All three garden villages at top of Lichfields housing delivery range/ need additional sites early in plan period. (Village Developments Takeley PSLP2915) • Commit to delivering a significant amount of employment (Countryside Properties UK Limited PSLP2765) • Safeguard unique environments ,buildings and properties in policies (PSLP2424 Little Linton Farms Partnership) • Transport measures: More on sustainable measures outside the site/Northern Gateway. Internalise more movements/Improvements at A11 Stump Cross roundabouts. New access onto the B184/New pedestrian/cycle connections linking with Chesterford Research Park, Great Chesterford station, Saffron Walden /Wellcome Trust. Pedestrian/cycle bridge or tunnel to deal with A11 barrier effect. New public bus service connecting the Wellcome Genome Campus, Whittlesford Parkway, Granta Park and the site. A “Northern Gateway” to site promoting sustainable movement. Support strategic improvements to the A505, or to Junction 9 of the M11. (Abington Park Farm PSLP2924) <p>NUGC Site Owner/promoter</p> <p>Supporting Text to SP7/requirements;</p>
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Para 3.101 WYG's vehicular trip assumptions for NUGC do not account for the high levels of internalisation within the site/22% rising to 40% for the full development scenario. Amount of development which could be accommodated is likely to be higher than the suggested 3,330 cap. Any restriction on development to be cognisant of transport conditions at the time.

- Paragraph 3.101 add "**Based on the Local Plan traffic forecasts in the evidence base, the proposed developer funded highway improvements could accommodate up to 3,300 new homes at North Uttlesford ... Development beyond this level would need to be considered as part of a 'Monitor and Manage' approach to development to ensure strategic highway improvements depend upon strategic highway improvements to the A505 Corridor between the M11 and A11 comes forward at the right time. such as dualling of the A505 between M11 and A11 junctions. It is proposed that beyond the end of the plan period, a monitoring strategy is identified and agreed with relevant stakeholders of 3,300 new homes is which will require the traffic impacts to be reviewed for significant additional phases of development based on the performance of the network at the time placed on any allocation at North Uttlesford Garden Community to ensure that development over this figure shown to have severe impacts.....**

Amendments to SP7/requirements;

Para 3 of introductory text

-Planning applications will be **determined in accordance with the development principles set out in the DPD** consistent with the approved DPD ~~which will need to be in place before any consent is granted for the new Garden Community.~~ **and the requirements of Policy D4 – Development Frameworks and Codes.**
- Para 2 para add ... employment floorspace **(B1a, B1b, B1c, B2, B8 and Sui Generis)**/delete Floorspace allocations to be defined within the Strategic Growth Development Plan Document.
- Paragraph 6: frequent and fast public transport connections to **important on- and off-site generators of travel demand, to reduce the reliance on the private car.** ~~Saffron Walden, Cambridge, Whittlesford Rail Station, Audley End Rail Station, Great Chesterford Rail Station and nearby employment parks (including the Wellcome Genome Campus and Chesterford Research Park).~~
- Paragraph 6; A range of **opportunities will be explored through the development of the DPD to provide high quality walking and cycling links, for example improving links to** ~~including linking the existing cycle path from Hinxton to Saffron Walden, and linking to Great Chesterford Rail Station and the nearby employment parks. via the PROW adjoining Great Chesterford to the North West of Jackson's Lane.~~
- Paragraph 8 "**amend Provide an access strategy that a strategy that offers connections with the A11, A1301 and the Cambridge Park & Ride being explored as part of the Cambridge South East Study (on the A1307), with the A11 being the preferred route for northbound travel.The development will avoid discourage the use of unsuitable roads by car through existing communities**".
- Para 3.100 3rd sentence add "**Discussions will also be held with Highways England regarding a new access onto the A11 to the north of the site to ensure that the full range of options is explored. A northbound public**

	<p><i>transport, walking and cycling link to this destination has the opportunity to deliver considerable benefits to the scheme.</i></p> <p>Historic Environment</p> <ul style="list-style-type: none"> • <i>Para 1. . delete The sense of tranquillity within the site should be maintained.</i> • <i>Para 3. Conserve and where appropriate enhance the significance of heritage assets and their settings both within the site and the wider area. Where mitigation is required, measures will have regard to the HIA Heritage Impact Assessment submitted with an application and include:</i> • <i>Para 4. Conserve and where appropriate enhance the significance of heritage assets and their settings, both within the site and in the wider area. Where mitigation is required, measures will have regard to the HIA and include:</i> <p>Para 3.97 add “There is also evidence of <i>potential</i> for significant buried archaeology on the site and in the wider area. The HIA concludes there is some scope for development of the site and suggests measures for avoiding and mitigating harm to the significance. A Heritage Impact Assessment will therefore be required with any application to demonstrate how future development will mitigate any potential impacts on, and where possible, enhance heritage assets within and surrounding the site.”</p> <p>Natural Environment</p> <p><i>Para 13. add Where appropriate, the sense of tranquillity within the site should be maintained.</i></p> <p>Paragraph 3.97: add “A Landscape and Visual Impact Assessment will therefore be required with any planning application to demonstrate how development will mitigate any potential impacts on, and where possible, enhance the landscape.”</p> <p><i>Para 17. Ultrafast Superfast broadband will be provided ...</i></p> <p><i>Para 19. Add “Sustainable Drainage Systems should also address the groundwater protection zone and flooding constraints and, where possible, provide betterment.”</i></p> <p>First sentence of paragraph 3.96: <i>This Local Plan sets out the principle of development at North Uttlesford within a broad area of search and identifies the form of the development...</i></p> <p>Residents</p> <ul style="list-style-type: none"> • Meet Garden City Principles /provide land value capture mechanism/Use CPO (PSLP1063 Mr Simon Witney) • Early provision of school places on NUGC • Reduce dependence on Whittleford Parkway and Hub/McDonalds roundabout • Access to the A11 should be precondition
Uttlesford District Council Regulation 19 Pre-submission Local Plan; Summary of Responses	
Section / Paragraph / Policy	Summary of Responses
Policy SP8 West of Braintree Garden Community	
SUPPORT	8
OBJECT	89
SUMMARY OF REPRESENTATI	<ul style="list-style-type: none"> • Waste Water: Support statements that the first part of Water Cycle Study has identified that there are technical solutions for foul water flows for the garden

<p>ONS IN SUPPORT</p>	<p>communities. However a statement about protecting water quality and that there are options for meeting the challenging targets required, should also be added. Due to the high percentage of WRCs that are located at river headwaters with limited dilution capacity we expect part two of the Water Cycle Study to address the challenges of permitting for extensions or changes to WRCs.</p> <p>Flood Risk: support the text within the utilities section that the communities will 'provide Sustainable Urban Drainage systems to provide water quality, amenity and ecological benefits as well as flood risk reduction. (PSLP2922 Environment Agency)</p> <ul style="list-style-type: none"> • Editorial and advisory comment: Paragraph 9 under Historic Environment relates predominately to Wildlife and contains two separate tier of wildlife designation. (PSLP901 ECC) • Highways England have been heavily involved in the transport evidence base and support the enhancement to public transport and sustainable mode offer across the district and practically for the garden village developments. It will be essential for the garden villages, that housing comes forward along with schools, Drs Surgery, other health care provision, shops, jobs, public transport and other infrastructure as the demand arises (PSLP3028 Highways England) • The parish council would like to point out that new settlements can be very nice places to live, providing sufficient facilities and infrastructure are provided, and it acknowledges the need for increased affordable housing to be made available for young people in the district. However there are concerns about creation of urban sprawl; impact on existing highways and public transport network (PSLP840 Fritch Green Parish Council) • Galliard controls through option the southern section of the land. Development can commence in 2022/3 and a minimum of 1400 homes can be delivered within the plan period. The land to the rear is controlled by the Andrews Airfield Consortium, with whom there is a co-operative approach to master planning. Land to the east within Braintree Council is largely under similar control, so the Plan can be considered effective also as it based on joint working cross-boundary by the two authorities and the respective landowners to deliver this strategic proposal in a consistent manner. (PSLP3055 Galliard Homes) • Support policy which has been prepared in consultation with Braintree DC and other stakeholders. It is justified through the evidence base and master plan. Committed to sustainable long-term governance and stewardship arrangements for community assets. (PSLP1994 Andrewsfield New Settlement Consortium) • The combined settlement options comprising West of Braintree, Easton Park and Chelmer Mead performed most strongly when assessed against sustainability Objectives compared to North Uttlesford GC. (PSLP2977 Welcome Trust)
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • There are concerns regarding the potential for detrimental impact on nearby listed buildings, Scheduled monument, conservation area and Andrewsfield Airfield. Work on a full Heritage Impact Assessment is welcomed but until finalised and it has informed the extent of the allocation and the policy wording the policy is considered unsound. (PSLP1855 Historic England) • Paragraph 9 is incorrectly shown under Historic Environment subheading. Reference to Essex Rams is supported but should be reworded to clarify that it is not Essex wide and that it is required to mitigate the impact of recreational pressures/disturbance from development on Essex Coastal SACs and SPAs and

	<p>not ancient woodland.</p> <p>The policy does not recognise that the site is likely to lie within the Zone of Influence for potential air quality impacts through increased traffic levels to Epping Forest SSSI, SAC.</p> <p>The policy omits requirement for development to provide a metric to demonstrate net gains for biodiversity and green infrastructure in accordance with Garden City Principles, emerging North Essex Authorities Section 1 Shared Strategic Local Plan, NPPF and Defra 25 Year Environmental Plan.</p> <p>The policy omits to protect and enhance the landscape which may be valued locally.</p> <p>The policy should promote the conservation, restoration and enhancement of priority habitats, ecological networks and priority species.</p> <p>The policy does not recognise loss of agricultural land. (PSLP2455 Natural England)</p> <ul style="list-style-type: none"> • Anglian Water as sewerage undertaker generally supportive of the requirements relating to foul and surface water drainage as. However:- <ul style="list-style-type: none"> - the wording relating to the requirements for foul drainage and sewage treatment which appears in second paragraph under the heading utilities should be amended to ensure it is effective. - the wording relating to the requirements for foul drainage does not appear to refer to an upgrade for sewage treatment as identified in the Council's Water Cycle Study. (PSLP999 / PSLP2525 Anglian Water) • In response to the letter from the Inspector of the North Essex Section 1 Plan Braintree DC would like to work with UDC to allocate a floorspace requirement for WoBGC. BDC objects to the omission of land between Boxted Wood and Andrewsfield within the area of search which would provide maximum flexibility for the location of the built development and for appropriately landscaped buffers and open space to neighbouring settlements. BDC supports the amended paragraphs on Transport. (PSLP2058 Braintree DC). • In response to the letter from the Inspector of the North Essex Section 1 Plan, the policy is lacking an indicative floorspace allocation for employment (PSLP882 ECC) • The policy does not consider the importance of connectivity between green and open spaces, allotments and recreational facilities to enhance recreational experience and opportunities especially if there are footpaths or cycleways and to ensure that access is as easy as possible. (PSLP885 ECC) • Paragraph 15 should relate to green infrastructure and not just blue infrastructure. The 25 Year Environment Plan aims to embed an 'environmental net gain' principle for development including housing as mandatory, building on the current policy that the planning system should provide biodiversity net gains where possible. This is an opportunity to embrace emerging changes that will occur over the lifetime of the Local Plan. (PSLP888 ECC) • Point 4 requires facilities to be provided in accordance with standards established in the Local Plan which is not consistent with Policy INF2 which requires provision in accordance with the most up to date Sport Strategy. (PSLP65 Sport England) • 1. Care should be taken to ensure that emerging policies will not have an adverse impact on healthcare provision within the plan area and over the plan period. 2. In instances where major policies involve the provision of development in
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	<p>locations where healthcare service capacity is insufficient to meet the augmented needs appropriate mitigation will be sought.</p> <p>3. Policies should be explicit in that contributions towards healthcare provision will be obtained and the Local Planning Authority will consider a development's sustainability with regard to effective healthcare provision.</p> <p>4. The exact nature and scale of the contribution and the subsequent expenditure by the NHS body responsible at that time, will be calculated as and when schemes come forward over the plan period to realise the objectives of the Local Plan.</p> <p>5. Before further progression and amendment of policies are undertaken, the Local Planning Authority should have due regard to any NHS national and local policies and plans and strategies.</p> <p>6. Plans and policies should be revised to ensure that they are specific enough in their aims, but are not in any way prescriptive or binding the NHS to carry out certain development within a set timeframe, and do not give undue commitment to projects (PSLP2582 West Essex Clinical Commissioning Group)</p> <ul style="list-style-type: none"> • Concerned about lack of public transport and increased pressure on the existing roads especially the A120 and B1256; coalescence; lack of consideration of alternative sites; loss of agricultural land and natural habitat; deliverability in current economic climate; detrimental impact on heritage assets. No account has been taken of Inspector's decision on NEGC. (PSLP2659 Gt Saling PC) • Stebbing Parish Council is implicitly opposed to the WoBGC due to its harmful impacts it would have upon the setting of the village and its historic character. Given that the North Essex Joint Examination Inspector has very clearly stated that the Joint Strategic Plan cannot be made sound without the removal of the three proposed garden communities from the Plan, including the West of Braintree Garden Community, we consider that the same conclusion must apply to the Uttlesford Local Plan. We strongly believe that once evidence underpinning the proposed West of Braintree Garden Community is reconsidered by the three Joint Authorities, there is a high likelihood that more appropriate and sustainable locations for major new housing development will be preferred. Sceptical regarding the cost and delivery of transport infrastructure to achieve step change increase in sustainable travel modes; deliverability of 40% affordable housing; implications of mineral extraction. (PSLP2205 Stebbing PC) • Object that WoBGC will be sandwiched in open countryside between two historic settlements of Stebbing and Great Saling having a serious adverse impact on historic assets, agricultural land and landscape. It is an unsustainable location poorly located to services and facilities including public transport. Development will cause harm to the natural environment with particular reference to Boxted Wood. In preparing the NP the group have evidence indicating the impact on Historic assets and landscape. Working of the minerals site will affect the delivery of the GC. The proposal prejudices the emerging LP and does not take into account the evidence base of the NP. The development will result in the loss of the Andrewsfield Airfield a long-established, important and valuable resource and facility for commercial and leisure flying as well as providing pilot training and meeting emergency service needs. (PSLP3007 Stebbing Neighbourhood Plan) • The Rapid Transport System would need to link settlements with places of
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	<p>work and retail centres if it were to replace private transport to any significant extent. A system which terminated at Stansted Airport would not achieve a significant transport mode shift. (PSLP2030 Sustainable Uttlesford)</p> <ul style="list-style-type: none"> • No reference to the creation of multi-user routes in accordance with Garden Community Principles. The policy mentions the Flitch Way and this is a definitive bridleway and therefore any links to this route should carry the same definitive status. (PSLP401 Essex Bridleway Assoc; PSLP401 British Horse Society; PSLP627 Flitchway Action Group) • The site boundary includes areas of ancient woodland and should only be lost to development in wholly exceptional circumstances. (PSLP819 Woodland Trust) • The policy does not fully reflect the principles of paragraph 174 of NPPF. (PSLP832 Essex Wildlife Trust). • It is not clear how issues relating to the airports operation or national aviation policy in respect of west of Braintree housing allocation have been considered. Point 6: there is no robust evidence to demonstrate the transport need or benefits that may arise from a transit link, or its implications and impacts, including its environmental cost, or any reasonable alternatives that have been considered. The site falls just 1km outside the 13km bird hazard consultation zone. Even though outside the consultation zone, a development of this scale could give rise to potential risk that requires assessment, particularly as a result of the SUDS and green infrastructure aspirations that are stated in the plan. There is no reference to aerodrome safeguarding effects in the policy specifically. (PSLP1514 Manchester Airport Group) • A delay in the delivery of one of the garden communities will have significant implications for delivery rates and the associated five year housing land supply. (PSLP188 Bloomhall) • A delay in the delivery of one of the garden communities will have significant implications for delivery rates and the associated five year housing land supply. (PSLP188 Bloomhall) • Concerns over delivery following conclusions of the Inspector examining the North Essex Strategic Section 1 Plan. (PSLP902 Bloor Homes) (PSLP2766 Countryside) (PSLP1863 Edward Gittins Assoc) (PSLP2833 Endurance Estates) (PSLP2900) Martin Grant Homes & Bloor Homes (PSLP2977 Welcome Trust) (PSLP2751 Crown Estate) (PSLP2866 Trustee of N Streeter Will Trust) PSLP2232 (WeAreResidents.org) PSLP2785 Fairfield Elsenham) PSLP2294 Eclipse Planning) and individual residents. • Development unacceptable due to impacts on the landscape, heritage, adverse impact on the countryside and ancient woodland, as well as impact on the neighbouring communities at Stebbing Green and Stebbing Village generally. (PSLP902 Bloor Homes) • . Taking into account constraints consider that the developable area is no more than 60ha and therefore cannot provide the scale of development proposed by the policy. (PSLP902 Bloor Homes) • Uttlesford Site is not sustainable. Concerns about delivery of transport infrastructure to achieve step change increase in sustainable travel modes. (PSLP2766 Countryside Properties) (PSLP2833 Endurance Estates) (PSLP2900) Martin Grant Homes & Bloor Homes (PSLP2751 Crown Estate) • The location of the settlement and infrastructure requirements dictate that the first phases of development should come forward in within the Braintree District. No evidence is provided to confirm that the development of 940
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	<p> dwellings will come forward in this plan period. (PSLP2766 Countryside Properties)</p> <ul style="list-style-type: none"> • Phasing and implementation strategy should be part of Local Plan and not Development Plan Document. (PSLP2766 Countryside Properties) • The delivery model of each of the garden communities, their reliance upon land value capture, the delivery of essential infrastructure remains unclear. (PSLP2674 Persimmon Homes) • By the time the DPD is adopted, a planning application determined, the level of infrastructure required it would be highly unlikely that dwellings would start to be completed by 2022/23 (PSLP2916 Village Developments Takeley) • It is not sustainable for only top up shopping needs be met. There is no reference to Country Parks or provision of any significant natural or semi-natural space. PSLP2232 (WeAreResidents.org) • Objections and Issues raised by individual residents. <ul style="list-style-type: none"> ○ Inadequacy of water cycle – with water courses too small and ecologically sensitive to accept discharge so effluent would need to be pumped to other WwTW ○ Detrimental impact on attractive countryside, farmland, woodland, footpaths and bridleways, wildlife and historic assets including archaeology. Detrimental impact on Stebbing Green, Boxted Wood and loss of Andrewsfield Airfield (former World War airfield and currently pilot training school. Landscape and heritage assessments undertaken for the Neighbourhood Plan have been ignored. Development would lead to increase in light pollution and its subsequent impact on wildlife. ○ Policy would lead to development in green buffer separating Stebbing from neighbouring villages and leading to urban coalescence. ○ Development is reliant on A120 improvements for which there is no guarantee. Concerns over the capacity of major and minor roads, A120 / M11 Junction. Insufficient information provided on Rapid Transit System. ○ Concerns whether residents will in fact use public transport. Braintree as the nearest railway station is inadequate. Residents will travel to Dunmow or Braintree for shopping etc by car. Most residents will work elsewhere are travel by car. There could be 4-5 cars per household. ○ No guarantee that employment will come to this development which is the wrong location for many businesses. ○ Insufficient details of the design and layout of the development are shown. ○ Concerns that services such as schools and GP facilities will not be provided early enough. The hospitals will not be fit for purpose. ○ Development is under a flight path from Stansted Airport. ○ Deducting areas inconsistent with national policy and should be protected from development then it is simply not possible to provide for the housing numbers put forward. ○ The financial viability of the GC cannot be demonstrated however by the formation of Development Corporations under new regulations laid down this year, viability could be achieved. No such plans have been presented. ○ The evidence base, including the Sustainability Appraisal, does not justify the policy and there are better and more sustainable options.
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	<ul style="list-style-type: none"> ○ Mineral extraction will affect the delivery of the proposal. This will affect the delivery of the West of Braintree proposal because it will act as a major constraint to the delivery of a new grade separated direct four-way junction onto the A120. Furthermore, it is uncertain whether similar prior mineral extraction and land restoration will be required on the Uttlesford side of the growth location and what implications this could have on the wider phasing of the new Garden Community. ○ The location did not come in response to a strategically and objectively assessed need for housing where employment and transport links would suggest they best be provided but in response to a call for landowners willing to sell. ○ There is no demand for high priced housing in this area. The existing market is stagnating ○ Not clear how providing affordable housing will addressed through the strategy of developing garden communities. ○ Air pollution will significantly increase with the potential of over 50,000 more cars within a 6 mile stretch along the A120 corridor.
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> ● Addition of the words 'around' or 'up to' are inserted before 10,500 -13,500 homes. There may be further work needed to tighten the policy wording and to more accurately reflect the outcome of the HIA once it is finalised. Point 9 should be under Natural Environment. Point 11a and 11b. re-order or re-word to ensure no repetition. Point 11b needs to include a list of key assets 'Including Stebbing, Rayne and Great Saling Conservation Areas, Saling Grove and Saling Hall Registered Parks and Gardens (both grade II)Porters Hall Moated site scheduled monument and a number of listed buildings.' Continue to suggest the inclusion of a concept/strategy diagram to illustrate the main features of the policy in relation to the garden community. It could include access points, location of heritage assets, buffer zones for heritage assets, strategic planting and other key considerations. (PSLP1855 Historic England) ● Move point 9 to be under Natural Environment. <i>Amend point 9 to read To address recreational disturbance / pressure impacts from development on coastal SPAs and SACs, contributions will be secured towards mitigation measures identified in the Essex wide Recreational Disturbance Avoidance and Mitigation Strategy (RAMs) which will be completed by the time the Local Plan is adopted.</i> Policy include a requirement for implementation of any measures identified as necessary, through the Epping Forest MoU study, to address air quality impacts to the SSSI/SAC. The policy should specify a funding mechanism for the delivery of the agreed measures and any measures required to address impacts to the nearby River Ter and Bovington Hall Woods SSSIs. This should be identified through the SA. The policy should include requirements for development to provide a metric to demonstrate net gains for biodiversity and green infrastructure. In line with paragraphs 170 and 172 of the NPPF, we advise that the WBGC should ensure protection and enhancement of the landscape which may be valued locally. We recommend that the relevant South Suffolk and North Essex Clayland (86) National Character Area (NCA) profile which has been produced by Natural England is referred to for further information.

	<p>The policy should also promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity, in accordance with paragraph 174 of the NPPF.</p> <p>The policy should include explicit requirements for development to protect best and most versatile agricultural land in accordance with paragraph 170 of the NPPF. (PSLP2455 Natural England)</p> <ul style="list-style-type: none"> • The wording of second paragraph under the heading utilities should be amended to refer to an upgrade for sewage treatment at the receiving WRC. It should also be consistent with the wording of any changes made to Policies SP6 and SP7 as the wording of this policy differs somewhat from these policies. (PSLP999 Anglian Water) • To be effective it is suggested that Policy SP8 is amended to include reference to an upgrade of sewage treatment and be consistent with any changes to Policies SP6 and SP7 (PSLP2515 Anglian Water) • Braintree would like to work with Uttlesford to allocate an employment floor space requirement for the West of Braintree Garden Community. The associated inset map for West of Braintree should include an area of land between Boxted Wood and Andrewsfield. Braintree District Council within the area of search, as this will provide maximum flexibility for the location of the built development within the area of search, and for appropriately landscaped buffers and open space to neighbouring settlements. (PSLP2058 Braintree DC) • Include employment floorspace allocation and/or employment land requirements. (PSLP882 ECC) • Additional or amended paragraphs 4/5 “Provide linkage of green infrastructure to the wider public realm to create green corridors and to improve accessibility for all and develop new links, utilising other components of urban greening” (PSLP885 ECC) • Change paragraph 18 to read: ‘Enhance wider green infrastructure and networks including its maintenance, as well as the maintenance and enhancement of existing watercourses, ponds and lakes within the site.’• Include an additional bullet point as follows: ‘Demonstrate the environmental net gains, and where there is a net loss from the development to provide provisions through offsetting.’ (PSLP888 ECC) • paragraph 9 of Policy SP 8 appears under the ‘Natural Environment’ heading rather than the ‘Historic Environment’ heading.(PSLP901 ECC) • Point (4) should be amended along the following lines: Provide allotments, open space, sports facilities, play, leisure and recreation in line with the most up-to-date Sports Strategy, standards established in the Local Plan, the Essex Design Guide and the Strategic Growth Development Plan Document. (PSLP65 Sport England) • The exact nature and scale of mitigation required to meet augmented needs of proposed developments will be calculated at an appropriate time, as and when schemes come forward over the plan period to realise the objectives of the Local Plan. This is based on current configuration of health care services and is subject to change. Anticipated Impact: New Primary Care facility required in Felsted. (PSLP2582 West Essex Clinical Commissioning Group) • Felsted Parish Council remains against the West of Braintree (WoB) development, primarily due to the impact of traffic through Felsted, the lack of infrastructure and the lack of natural resources. We believe that it is unsustainable.
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	<p>UDC are completely beholden to the North Essex Garden Partnership (NEGC) for delivery of the West of Braintree (WoB) new town which the Government Inspector has found the NEGC plan ‘unsound’. Given the NEGC Plan rejection it is not possible for UDC to know, in time for the UDC Plan submission, in what form, when, or even if, the WoB development will be progressed by NEGC. It is therefore unsafe, and risks the Plan being found unsound, to include WoB in housing delivery calculations for the current plan period. The area proposed for the WoB development is directly overflowed by incoming planes, 24 hours a day, for runway 4 at heights of lower than 7000 ft. It is also overflowed by runway 4 departures at 4-7000 ft as they vector north from the NPR. This means that this area is not an acceptable location for a major housing development. (PSLP731 Felsted PC)</p> <ul style="list-style-type: none"> • Policy SP8 should be deleted from the Draft Plan, together with all associated references within it to the West of Braintree Garden Community. (PSLP2205 Stebbing PC) (PSLP3007 Stebbing Neighbourhood Plan) • Amend policy to include all users and all new routes are created as multi-user routes accessible to all vulnerable road users including equestrians, (PSLP401 Essex Bridleway Assoc; PSLP401 British Horse Society; PSLP627 Fritchway Action Group) • Amend policy to ensure that the ancient woodland within it is protected and given adequate buffering from any surrounding housing or other development. (PSLP819 Woodland Trust) • The plan needs to specifically address how it has been developed in respect of the emerging national aviation policy and also the airspace modernisation strategy. Remove requirement 6 unless there is appropriate and proportionate evidence base to justify policy requirement In respect of aerodrome safeguarding matters, given the issue is a repeated risk across a number of elements, it is considered that an overarching caveat is inserted into the introductory paragraphs of the main policy text. For example: “ <u>The DPD, and any future planning applications, will also demonstrate how aerodrome safeguarding considerations have been incorporated into the overall design of the new garden community to ensure that any development does not impact upon the safe and efficient operation of aircraft at or in the vicinity of London Stansted Airport</u>”. (PSLP1514 Manchester Airport Group) • Further allocations need to be made (PSLP2674 Persimmon Homes) (PSLP2751 Crown Estate) (PSLP2866 Trustee of N Streeter Will Trust) (PSLP2916 Village Developments Takeley) such as <ul style="list-style-type: none"> ○ land south of Beldhams Lane Bishops Stortford. (PSLP188 Bloomhall) ○ land north of Stansted Mountfitchet (PSLP902 Bloor Homes) (PSLP2900 Martin Grant Homes & Bloor Homes) ○ Land at Elsenham (PSLP2785 Fairfield Elsenham) • Remove policy from plan (individual residents)
<u>Policy SP9 Development Within Development Limits</u>	
SUPPORT	1
OBJECT	9
SUMMARY OF REPRESENTATI	<ul style="list-style-type: none"> • Welcome the addition of a reference to the significance of heritage assets (PSLAP1857 Historic England)

ONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Policy does not support alternative uses on land. NPPF confirms a positive approach to the reuse of existing allocations to address an identified need (para 22 NPPF 2012; Para 120 NPPF 2018). (PSLP1662 The Joint Administrators of Pulse Packaging). • Policy omits a number of material considerations on air pollution and traffic congestion. (PSLP2233 We Are Residents) • Natural England welcomes acknowledgement that development should be 'compatible' with the natural environment. However, we would prefer a requirement for development to protect and enhance the natural environment, and deliver net biodiversity gain in accordance with the NPPF and the Defra 25 Year Environment Plan.(PSLP2456 Natural England) • Object to first criterion as it provides an unnecessary barrier to delivering development within development limits that is unsubstantiated by the evidence provided and risk preventing sustainable development. (PSLP2835 Endurance Estates; PSLP2897 Grant and Bloor) • Opportunities have been missed to amend settlement boundaries to allocate additional sites that could assist in meeting housing needs, and contribute to the vitality of settlements whilst avoiding unacceptable landscape impacts. (PSLP2989 Richard Coke; PSLP2997 Landhold Capital Ltd) • Policy does not safeguard neighbours from the environmental impact of development. (PSLP426 Richard Walford) • Whilst there is a basic distinction between the 'within' and 'without' development type settlements, there is no justifiable reason for the wording for the criteria, in Policy SP9 and Policy H5, which deal with the same issue to vary. (PSLP2153 Henham PC)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • The Policy should be amended to reflect the more flexible approach taken by the NPPF towards the reuse and redevelopment of allocation sites where there is no reasonable prospect of those sites being used for the use allocated. <ul style="list-style-type: none"> ○ policy should be amended as follows: "<i>Development will be permitted on land within development limits if: 1. It is in accordance with any existing allocation, unless it has been demonstrated that there is no reasonable prospect for the allocated use to be continued on site, and where the proposed redevelopment would contribute to meeting an identified development need.</i>" • (PSLP1662 The Joint Administrators of Pulse Packaging) • new development should not: a. Adversely affect air pollution levels inside an AQMA; b. Increase traffic congestion; c. Have an adverse effect on Conservation Areas or conservation assets, whether by reason of the development itself or the traffic it would generate. (PSLP2233 We Are Residents) • Delete criteria 1. (PSLP2835 Endurance Estate; PSLP2897 Grant and Bloor) • changes should be made to settlement boundaries to allow for further growth of communities and in particular to include the site at Chickney Road, Henham. (PSLP2989 Richard Coke) • changes should be made to settlement boundaries to allow for further growth of communities and in particular to include the site at Mill Road, Henham. (PSLP2997 Landhold Capital Ltd) • Add new para 8:"8. "It minimises the environmental impact on neighbouring properties by appropriate mitigating measures."Revise para 5 to add after the

	<p>words "overshadowing of" the words "or cause material disturbance (whether by noise, light, smell, vibration or otherwise) to" so that it reads "It does not result in any material overlooking or overshadowing of, or cause material disturbance (whether by noise, light, smell, vibration or otherwise) to neighbouring properties." (PSLP426 Richard Walford)</p> <ul style="list-style-type: none"> • Criterion 1. in SP9 is meaningless so should be replaced by: Development outside the development limits is regarded as being in the countryside such that Policy SP10 applies. (PSLP2153 Henham PC) <p>Replace criteria 2-7 with the following which uses the same wording for the same criteria which are common to both 'with development limits and 'without limits' settlements, and should be used in SP2 and H5:</p> <ul style="list-style-type: none"> ○ 2 It would be compatible with the character of the settlement and, depending on the location of the site, its countryside setting and natural environment; ○ 3 The setting of existing buildings, the natural and historic environment (including Listed Buildings, Conservation Areas, Protected Lanes and Preserved Trees), and the character of the area are protected; ○ 4 Development provides adequate amenity space and does not result in an unacceptable loss of amenity space; in accordance with the Essex Design Guide or subsequent guidance ○ 5 There would be no material overlooking or overshadowing of neighbouring properties; ○ 6 The development would not have an overbearing effect or cause disturbance to neighbouring properties; ○ 7 The resulting development would not result in unreasonable noise and disturbance to the occupiers of neighbouring properties from vehicles or any other cause. (PSLP2153 Henham PC)
Policy SP10 Protection of the Countryside	
SUPPORT	2
OBJECT	18
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Natural England supports amendments to the policy, to include separate requirements for the protection of best and most versatile agricultural land and biodiversity, in line with our previous advice, and the SA recommendation for better protection of biodiversity through this policy (<i>Natural England PSLP 2457</i>) • Birchanger Parish Council fully supports the decision to protect the Green Belt within Uttlesford District. It is important to Birchanger residents that the village maintains its rural character and does not merge with other settlements. (<i>Birchanger Parish Council PSLP 34</i>)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Refusal to release Green Belt on land south of Beldams Lane fails to positively plan for development (<i>Bloomhall PSLP 189</i>) • Makes no reference to revised NPPF July 2018; and • SP10 is totally prescriptive in stating that no housing development would be permitted in areas of the countryside whereas the overarching issues of Sustainable Development and due consideration for development adjacent to existing settlement boundaries should be considered in line with the latest national planning policy. (<i>Go Holdings Ltd PSLP</i>)

	<ul style="list-style-type: none"> • Lack of evidence to show that the Green Belt has been assessed on a finer grain than the 2016 Review; • No evidence of how the assessed 31 areas perform in relation to the purpose of including land in the Green Belt; • Protecting the Green Belt in its entirety is a simplistic view of the Green Belt. (Strutt & Parker Farms PSLP 2772) • The policy restricts development in the countryside, agriculture, horticulture, forestry, outdoor recreation and other uses which need to be located in the countryside; and • Additional definition including agricultural, recreational uses and biodiversity in Policy SP10 is considered unnecessary and overly restrictive. (Taylor Wimpey PSLP 2882) • The CPZ Study is too “broad brush” and certain sites can in Takeley and land at Parsonage Lane can be brought forward without undermining CPZ functions; • Current CPZ boundary offers no flexibility and is not justified. (Endurance Estates PSLP 2836) The site is severed from its surroundings by built development and the impact of the proposed development on the CPZ function of preventing changes in rural settlement pattern will be minimal. (Pigeon Investment Management Ltd PSLP 2740). • The plan as currently worded fails to provide sufficient flexibility for future • consideration of opportunities for master-planning of the area around the airport which is a key strategic location in its own right; • The approach currently adopted is not justified or effective as the most appropriate strategy for plan (Legal & General PSLP 2620) • This policy does not sufficiently take into account the ability of previously developed land to accommodate a range of uses, the existing use and character of previously developed sites which may be enhanced through redevelopment or allow for the specific needs of ‘other uses’ to be adequately considered (National Express Ltd. PSLP 2755). • The Local Plan relies on a 2016 review of the Green Belt and fails to adequately assess the need for a further review of the Green Belt in light of the current shortfall of housing land supply and the desire to promote sustainable development and encourage sustainable modes of transport. (Bloomhall PSLP 193) • The plan does not strongly address or give any weight to preserving the countryside. (PSLP 24) • The policy is unduly restrictive and is not consistent with national policy. The draft policy wording is too restrictive and will prevent sustainable development from coming forward (Sworders PSLP 846).
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Amend paragraph 3.121 text to include release of land south of Beldams Lane (Bloomhall PSLP 189) • A finer-grain assessment should be undertaken around settlements in order to differentiate sites in greater detail; • Local Plan to deliver development in Type A Villages including those within the Green Belt by releasing Green Belt in certain locations and stifle development on suitable sites; (Strutt & Parker Farms PSLP 2772) • The policy should be amended by removing reference to value as productive

	<p>agricultural land, recreational land and for biodiversity and the permitted uses defined in the policy because they are not justified. (Taylor Wimpey PSLP 2882)</p> <p>The CPZ boundary should be altered to reflect the opportunities to deliver sustainable development at Takeley where they do not undermine the functions of the CPZ. (Endurance Estates PSLP 2836)</p> <ul style="list-style-type: none"> • The site should be removed from its CPZ designation (Pigeon Investment Management Ltd PSLP 2740). • The final section of Policy SP10 should be amended to acknowledge that development proposed within the Countryside Protection Zone will require careful consideration whilst allowing flexibility for uses that would provide sustainable transport connections or other sustainable land uses offset any environmental harm to the land in its current form (Legal & General PSLP 2620) • Addition of the following criterion, “Within the Countryside, planning permission will be granted for the redevelopment of previously developed land and the re-use of existing buildings in order to make best use of available brownfield land and buildings, thus minimising the need for the development of greenfield sites.” (National Express Ltd. PSLP 2755). • The Green Belt boundary should be reviewed and the land south of Beldams Lane, Bishop's Stortford should be released for residential development given its sustainable location. (Bloomhall PSLP 193) • There should be more evidence of countryside protection in the Local Plan (PSLP 24) • The policy to be amended to read as follows: <ul style="list-style-type: none"> “The Countryside is defined as land outside the development limits and identified new garden communities and consists of: <ul style="list-style-type: none"> ○ The Metropolitan Green Belt ○ London Stansted Airport Countryside Protection Zone ○ Countryside beyond both the Green Belt and the Countryside Protection Zone <p>The Countryside will be recognised for its intrinsic character and beauty, for its value as productive agricultural land, recreational land and for biodiversity. The Landscape character and local distinctiveness of the Countryside will be recognised.</p> <p>Development within the Metropolitan Green Belt as defined on the Policies Map will be assessed against the latest national policy. Development within the London Stansted Airport Countryside Protection Zone as defined on the Policies Map will only be permitted where new buildings or uses of land do not lead to coalescence between London Stansted Airport and existing development and do not adversely affect the open character of the Zone.</p>
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	<p>Within the Countryside beyond the Green Belt and Countryside Protection Zone, development will be permitted where it is supported by other policies in the development plan and will be expected to:</p> <ol style="list-style-type: none"> 1. Recognise the intrinsic character and beauty of the countryside; 2. Protect the best and most versatile agricultural land; 3. Minimise impacts on biodiversity; 4. Focus development in locations with good access to services and facilities (<i>Sworders PSLP 846</i>).
Policy SP11 London Stansted Airport	
SUPPORT	0
OBJECT	31
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Strongly object to the proposal to permit non-airport related B1, B2 and B8 uses on 55 ha of land (North Stansted Employment Area) that was previously safeguarded for airport-related development. (Pigeon Investment Management / Savills; PSLP2737) • Objects on the grounds of Increased number of passenger and flight numbers results in an increase in noise pollution, rise in air pollution and extreme pressure placed on the M11. (PSLP176) • The 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 and must be retained to ensure soundness. (MAG; PSLP1519) • The strategic nature of this policy ambition requires partnership commitment with other transport agencies and this has not been included. A commitment to partnership with the airport from bodies such as the Council and key transport organisations/agencies such as HE, ECC and Network Rail, is required to achieve this aim. (MAG; PSLP1519) • Objects The Reg 19 policy being altered in such a way so as to require the provision of capacity for other journeys (i.e. not air passenger or employee) and also now requires that capacity must be enhanced to accommodate all journeys. It is unclear as to how this policy position has been reached, what the nature and scale of other journeys comprise, what enhancements are required or envisaged (and how they might be delivered so as not to disrupt the primary function of our transport facilities which is to support passenger and employee journeys), or what their impact on the capacity and operation of airport infrastructure might be. (MAG; PSLP1519) • Objects to the requirement of the airport to safeguard land and financially contribute to rapid transport options. (MAG; PSLP1519) • Clause 8 of the policy should recognise that whilst public transport is the most sustainable mode of transport, 50% of passengers will still arrive at the airport by car and Long Stay Parking is the most sustainable solution for this as it halves the number of taxi journey's and kiss & fly. The policy should recognise this position and we object on this basis. . Failure to make provision for sufficient parking could result in adverse local

	<p>transport conditions and nuisance impacts, unlawful development in the countryside and an increase the kiss and fly trips that Clause 8 of the policy seeks to avoid. Our clients support Clauses 9, 10 and 11, as proposed under airport related car parking, as they provide clear and appropriate means against which to assess an application for off-airport parking. (Holiday Extras Limited; PSLP1547)</p> <ul style="list-style-type: none"> • Object to Clause 12 of the policy as currently written as, by definition, off-site airport related parking cannot accord with a Strategic Development Plan (SDP) which includes a core objective of providing all airport related parking on-site. (Holiday Extras Limited; PSLP1547) • In addition, the SDP is only updated intermittently - current targets are only up to 2019 (Holiday Extras Limited; PSLP1547) • There is no mention of the historic environment in this policy (Historic England; PSLP1858) • In addition, the housing policy of the UDC plan does not adequately take into account the impact of the airports air pollution. At Takeley (which is not under the flight paths), aviation exhaust fumes can easily be smelt. (PSLP2337) • With policy SP11 there is no safeguard to stop or prevent a 2nd Runway at Stansted Airport. (Takeley Parish Council; PSLP2458) • Policy provides inadequate protection to the natural environment, including nationally and internationally designates sites through changes in air quality through proposed development. Natural England does not agree with the HRA screening for Policy SP11 and believes that further work is required “ ideally the HRA should be revised once the findings and recommendations of the Epping Forest AA / mitigation strategy have been published. (Natural England; PSLP2458) • Different Growth Scenarios should have been modelled or considered (R4U; PSLP2594) • With regards to the direct public transport link between the airport and Easton Park, the policy does not specify where access is to be provided from. (Landsec; PSLP2610) • We do not agree that the present extent of the Stansted Airport Policy Area is the most appropriate strategy. Land adjoining this area provides potential for strategic development not necessarily directly associated with the airport but to provide for other uses including employment and training/learning opportunities to serve a wider range of interests, utilise the existing infrastructure connections in this location and reduce reliance on Stansted Airport itself to support the economy of the local community. This would also reflect the strategic location in close proximity to the Easton Park community. (Legal & General; PSLP2621) • A further increase in commercial non-airfield related business, proposed for an 18-hectare site North side of the airport, will add to the burden on the local infrastructure. Should such a vast warehousing scheme become reality then the projected growth in traffic volume, published by STAL in their application to expand to 43mppa, is likely to be exceeded. (Stansted Mountfitchet Parish Council; PSLP2630) • Sources of airport jobs growth figures not clarified. (PSLP2657) • There should be greater safeguards in SP11 to restrict airport expansion unless it can be clearly demonstrated that the Spatial Vision is not compromised by any expansion proposal. (Littlebury Parish Council;
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	<p>PSLP2699)</p> <ul style="list-style-type: none"> • We strongly object to the proposal to permit non-airport related B1, B2 and B8 uses on 55 ha of land (North Stansted Employment Area) that was previously safeguarded for airport-related development. Lifting the airport restriction will have consequences for accommodating airport related growth in the future, should the dynamics of the airport change and space be required. (Pigeon Investment Management; PSLP2737) • Designation of the North Stansted Employment Area conflicts with Recommendation 8 of the ELR, which states that the Council should continue to support airport related development within the airport boundary in line with the Airports Sustainable Development Plan (SDP). (Pigeon Investment Management; PSLP2737) • The Local Plan states things like with permission to operate up to 35 mppa, which is forecast by the airport operator to be reached by 2025, a totally unsubstantiated forecast and in conflict with the more professional forecast provided by the CAA of 2035.(EARAG; PSLP2756) • Forecasts are not substantiated by reference to methodologies applied and sensitivity analysis relevant to any conclusions and outcomes. SP11. Previously Manchester Airports Group (MAG) has sought to influence, directly, the wording of this Policy SP11 to the detriment of Uttlesford Residents by weakening its requirements. (EARAG; PSLP2756) • Can the data substantiating the employment claim be reviewed as this is not thought to be correct; Stansted employment of residents/nearby areas is low and not of good quality permanent employment. (EARAG; PSLP2756) • Plan ambition to assist in reducing carbon ambitions from the airport is at variance with the UDC planning officers intent around the expansion of the airport to 45m passengers p.a., as are the noise and air quality ambition in para 3.142.....not practically achievable and should be re-written. (EARAG; PSLP2756) • The section is mostly silent on the impacts of increases in passenger numbers beyond the permitted 35 million ppa. The exception to this is at 3.141 where it is discussed in relation to climate change mitigation. We consider that this leaves the LPA in a weakened position in respect of applications that might give rise to unsustainable impacts for waste water treatment. The section should make clear the assumptions for projected passenger numbers used for the Water Cycle Study once complete as per position statement. Whilst we acknowledge that the issue is alluded to within criteria 4 of the policy, it should be made clearer due to the specific issues of the water environment in the area. We have previously requested additional policy wording at the regulation 18 consultation in our letter dated 8 September 2017 which we remain of the opinion is worthy of inclusion. (Environment Agency; PSLP2923)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Given the discussions around the SATF as part of airport 35+, it would be appropriate to ensure the targets are not only monitored but reported. Change paragraph 3.138 to read: ...will set, monitor and report targets...(Essex County Council; PSLP905) • Paragraph 1, line 4: Replace "incorporates" with "excludes". delete criterion 10:"1.The reference to the SDP Modal Shift Targets should be deleted. Change “Northern Stansted Employment Area” to “North Stansted Employment Area”. Change “Visibility” to “Visibility”. (Stop

	<p>Stansted Expansion; PLSP378)</p> <ul style="list-style-type: none"> • The references to the Stansted Airport Sustainable Development Plan and Stansted Airport Noise Action Plan should be removed. 1: Change para 3.135 2: Correct policy SP11 to comply with objections raised by Stop Stansted Expansion. 3: Policy SP12 - correct line 2 from SEDIGNED to DESIGNED (PSLPS842) • Paragraph 3.138. This is an advisory comment. The paragraph states The London Stansted Area Transport Forum and its working groups will set and monitor targets to deliver an increase in sustainable surface access to the airport.â€• Given the discussions around the SATF as part of airport 35+, it would be appropriate to ensure the targets are not only monitored but reported. Change paragraph 3.138 to read: ...will set, monitor and report targets...•. (Essex County Council; PSLP905) • As per our comments relating to SA1, the final sentence requiring a development brief and masterplan 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. The approach is not justified. (MAG; PSLP1519) • For Clause 8 of Policy SP11, the following wording is recommended: 8. Incorporate sustainable transportation and surface access measures in particular which, whilst recognising the use of the private car, seek to minimise use of the private car, and maximise the availability and use of sustainable transport modes and seek to meet modal shift targets, all in accordance with the London Stansted Sustainable Development Plan; Clauses 9-15 under Airport-related Car Parking and London Stansted Airport Strategic Allocation should be renumbered Clauses 11-17. For Clause 12 (as currently numbered under Airport Related Car Parking), the wording should be amended following discussion with the Airport Operators to identify the amount of parking that should be provided within the airport each year that helps to meet their SDP target modal split and increased passenger numbers. In years when figures have not been achieved, off-site parking would be permitted, subject to other policies in the Plan. (Holiday Extras Limited; PSLP1547) • Given the strategic nature of this policy, we suggest that reference should be included in this policy to the historic environment (Historic England; PSLP1858) • Paragraphs 3.75 to 3.88 addresses properly the issue of the relationship between the employment it provides and the location of housing needed to support the airport in a sustainable manner. (Eclipse Planning; PSLP2296) • The economic objectives of the Plan should therefore be sought elsewhere through other initiatives and should not be based on Stansted Airport Expansion (Saffron Walden Town Council PSLP2322) • Policy T3 in the 2005 local plan remain which states proposals for car parking associated with any use at Stansted Airport will be refused beyond the airport boundary. (Takeley Parish Council; PSLP2458). • Your authority should ensure that Policy SP11 includes a commitment for development to deliver mitigation to address adverse impacts to Epping Forest SAC through AA, in accordance with the requirements of the Habitats Regulations. A further requirement for development to deliver mitigation to address impacts to other designated sites, such as Hatfield Forest SSSI, Quendon Wood SSSI, Elsenham Woods SSSI and High
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	<p>Dunmow Wood SSSI should also be included. (Natural England; PSLP2458)</p> <ul style="list-style-type: none"> • East Herts Council also requests that an amendment is made to Policy SP11 to include measures to address and avoid the impacts of inappropriate airport-related parking in nearby settlements. (East Hertfordshire District Council; PSLP2503) • The policy should be amended to confirm that the safeguarded access relates to creating a linkage to Easton Park. We consider that the Local Plan policy should include reference to a Compulsory Purchase Order being progressed should this prove necessary. (Landsec; PSLP2610) • Paragraph 1, line 4: Replace "incorporates" with "excludes".(EARAG; PSLP2756) • Airport Development Criteria: Amend criteria 1,3,5,8 to read as follows, and delete criterion 10: <p>"1. They are directly related to the operation of the airport". "3. They are in accordance with the permission granted by the Secretary of State in his decision letter of 8th October 2008 or such other decision letter as may have subsequently been issued by the Secretary of State". 5. Achieve further noise reduction or at least no increase in aircraft noise impacts including ground noise impacts at any time of the day or night." 8. Incorporate sustainable transportation and surface access measures in particular which minimise use of the private car, and maximise the availability and use of sustainable transport Delete criterion 10: Reason: UDC has no control over the Stansted Airport Sustainable Development Plan ('SDP') for Stansted t and so, for example, would not be able to prevent the airport from adopting a SDP which included a second runway. (EARAG; PSLP2756)</p> • Airport-Related Car Parking Paragraph 1, line 3: The term "appropriate mechanisms" is too vague. Clarification is needed (EARAG; PSLP2756) • Delete point 12. Reason: As previously stated, UDC has no control over the Stansted Airport SDP and so cannot be bound by the policies and targets set down therein. (EARAG; PSLP2756) • Implementation and Monitoring of Strategic Projects Reason: To avoid misinterpretation of Policy M2. Paragraph 1, line 2: Replace "London Stansted Airport" with "North Stansted Employment Area".(EARAG; PSLP2756) • The outcome of the completed WCS will further inform SP11 in respect of its assumptions and findings. In the interim no development including growth in passenger numbers will be permitted unless it has been demonstrated by the applicant that either sufficient waste water treatment infrastructure already exists or additional waste water treatment infrastructure can be provided before the development becomes fully operational. (Environment Agency; PSLP2923) • SP11 Point 4 should be amended to accept that Air Traffic movements and passenger numbers will increase. For the Plan to be sound it needs consequential amendment to embrace this expansion and to plan infrastructure accordingly but also plan to mitigate the impact on Uttlesford residents where possible. (PSLP2935)
<u>Policy SP12 Sustainable Development Principles</u>	
SUPPORT	0
OBJECT	11

SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Although SP12 is shown in Appendix 1 as replacing GEN4 , criterion 5 is weak and therefore almost valueless. (PSLP427 Richard Walford) • This policy and text focusses on carbon reduction with no reference to adaption, other than the reference to change in climate and weather patterns (paragraph 3.146). Policy does not include strategies to mitigate and adapt to climate change in line with the Climate Change Act 2008. This includes taking into account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. .(PLSP909 Essex County Council) • Policy does not specifically mention climate change. It should encourage the opportunites from environment through green infrastructure to adapt to climate change. (PSLP910 Essex County Council) • Criterion 4 should refer to historic environment as it encompasses all aspects of heritage. (PSLP1859 Historic England) • The policy ignores the effect on carbon emissions from transport which is the single biggest contributor to Uttlesford’s carbon footprint.(PSLP2235 We Are Residents) • The policy should be given more prominence within the plan as it contains what could be described as core planning principles. Furthermore do not consider that policies SP2-SP11 are consistent with the provisions of SP12. The Garden communities do not constitute the prudent and sustainable management of the District. (PSLP2297 Eclipse Planning Services) • The plan should reduce the energy demand of the District, and include firm proposals to increase the local generation and storage of electricity which is being promoted and incentivised by Government.(PSLP2408) • Natural England commends the inclusion of safeguards for the natural environment in this policy but would also like to see reference to ‘enhancement’. All relevant development should be required to deliver net biodiversity gain wherever possible, in accordance with paragraphs 170, 174 and 175 of the NPPF and the aspirations of the Defra 25 Year Environment Plan. A requirement for development to make a positive contribution through habitat creation / enhancement to the Essex Wildlife Trust Living Landscape initiative should be included.(PSLP2459 Natural England) • Criterion 1 is a very general statement and it is unclear in the Policy of the forward what this means in practice. In addition, the plan needs to consider the associated cost of meeting these criteria.(PSLP2675 Persimmon Homes) • Unclear on the purpose of this policy as it seems to include some generic principles which are contained within national policy and/or other policies within this Local Plan.(PSLP2801 Gladman) • Object to criterion 3. Uttlesford has few opportunities for brownfield development, and a degree of greenfield development is inevitable. The sustainability of the site should be judged against suitability of the site and access to services and not whether is brownfield or not. Not building on greenfield sites would result in an inability to meet the District’s development needs. Greenfield land is generally less constrained and less prone to having

	<p>significant abnormal costs through demolition or remediation due to contamination issues. If the intention of the policy is to encourage use of brownfield sites, criterion 2 already sets this out and is sufficient for that purpose. (PSLP2832 Endurance Estates)</p>
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • At the end of sub para 5 of SP12, add: "Development and uses, whether they involve the installation of plant or machinery or not, will 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. (PSLP427 Richard Walford) • Policy SP 12 should reference the need to ensure the sustainability principles include climate change mitigation and adaptation in the lifetime of the development.(PLSP909 Essex County Council) • Add additional criteria: 'Using green infrastructure as a way of adapting and mitigating for climate change through the management and enhancement of existing habitats and the creation of new ones to provide multiple functions and benefits" and 'Provide opportunities for renewable and low energy technologies, including electric vehicle provision;' (PSLP910 Essex County Council) • Amend criterion 4 to refer to retaining and enhancing the historic environment. (PSLP1859 Historic England) • Address the effect of carbon emissions from transport in policy and supporting text. Text should note that the 2011 Local Authority statistics showed that 59% of Uttlesford's carbon footprint was attributable to transport.(PSLP2235 We Are Residents) • Merge with Policy SP1 (PSLP2297 Eclipse Planning Services) • Include reference to 'enhancement' of natural environment. All relevant development should be required to deliver net biodiversity gain wherever possible. A requirement for development to make a positive contribution through habitat creation / enhancement to the Essex Wildlife Trust Living Landscape initiative should be included.(PSLP2459 Natural England) • Delete criterion 3 (PSLP2837 Endurance Estates)

Uttlesford District Council Regulation 19 Pre-submission Local Plan; Summary of Responses	
Section / Paragraph / Policy	Summary of Responses
4. Housing	
SUPPORT	1
OBJECT	21
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Uttlesford should not be meeting the housing needs of London (PSLP43 R Shaw) • No evidence that UDC will listen to representations (PSLP212 J McDonald) • Current new housing does not offer enough houses at low cost and planned further housing appears to also concentrate on high cost homes. (PSLP648 J Capon) • NUGC is not in the right location in the District to fulfil the needs of Uttlesford's housing waiting list (PSLP727 B Linford) • The housing targets which UDC uses to justify the 3 Garden Communities are based on old statistics for projected employment growth at Stansted Airport, growth of Chesterford Research Park and Uttlesford population growth generally.(PSLP730 B Linford) (PSLP1843 J Lynch) (PSLP2077 G Matthews) (PSLP2082 G Benn) (PSLP2090 J Luke) (PSLP2107 S Wilkinson) (PSLP J Peden) • The Strategy of Garden Communities and Easton Park GC is inappropriate because of the special rural character of Uttlesford. (PSLP758 Cogger-Berry) • Residents will not benefit from land gains (PSLP827 A Armstrong) • Is the right type of housing being planned for (there is a lack of low cost,affordable property) and concerned about impact of development on services and facilities. (PSLP1047 Mr & Mrs Winter) • Paragraph 4.27 - the establishment of Community Land Trusts to deliver truly affordable housing is strongly urged. (PSLP2037 Sustainable Uttlesford) • there are no minimum space requirements for new homes (PSLP2243 We Are Residents) • The Plan has not taken into account the wider array of tenures as set out in the revised NPPF (PSLP2776 Rentplus • The reference in paragraph 4.23 to specific split between tenure and size is unnecessary and suggests an inflexible approach contrary to national planning policy. The reference to clusters of 10 units is considered overly onerous, as it would give rise to management issues for the affordable housing provider, particularly on larger sites. (PSLP2562 Bovis Homes) • The policy and text makes no reference to NPPF18 paragraph 77 and glossary (PSLP2157 Henham PC) • Paragraph 4.46 does not reflect the most up to date position regarding the ECC Independent Living Programme and refine terminology. (PSLP911 ECC)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Put the true needs of local people first. Build care homes and sheltered accommodation. (PSLP43 R Shaw)

	<ul style="list-style-type: none"> • Associated infrastructure must be developed to avoid negative impact on current and future residents (PSLP648 J Capon) • Opportunities for rural exception sites and opportunities for villages to grow and thrive should be supported (PSLP758 Cogger-Berry) • New policy on minimum space requirements for new homes. (PSLP2243 We Are Residents) • Para 4.24 should be re-worded to work on the assumption that development is in all cases viable, and that viability studies commissioned by developers to prove unviability should be the exception not the norm and should be tested thoroughly. (PSLP2325 Saffron Walden Town Council) (PSLP2942 Saffron Walden and Little Walden Neighbourhood Plan group) • Amend paragraph 4.23 in relation to its tenure split to reflect new tenure categories of affordable housing for rent and other affordable routes to home ownership. • Paragraph 4.23 Delete reference to the tenure split of 71% affordable rent or social rented tenure and 29% shared ownership or intermediate housing tenure. Amend to clusters of 15 dwellings. • Modify paragraph 4.26 to include “the NPPF makes the following additional restriction which are endorsed in this Plan: these are “small sites” which would be used for affordable housing “in perpetuity” where some market housing is required and that would have to be proven in a viability assessment. Viability Assessments are now to become fully publicly available (NPPF July 2018 para 57).” (PSLP2157 Henham PC) • Change paragraph 4.46 to read “Uttlesford has an ageing population which has clear implications for the future delivery of housing over the Local Plan period. Essex County Council (ECC) is the provider of social services in the District. ECC’s approach to Independent Living encourages the provision of specialist accommodation in Essex as a means by which older people can continue to live healthy and active lives within existing communities. For Uttlesford District, in 2016 ECC assessed a need for 159 units to enable older people to live independently within the community by 2020. This provision is in addition to the requirement for sheltered housing and any other appropriate housing and support options. The need for Independent Living is set out in ECC’s Independent Living Position Statement (2016). ECC will update its assessment of demand for specialist accommodation during 2018. This approach to meeting the specialist accommodation needs of older people is intended to reduce the demand for residential/nursing home care, which is a considerably more expensive way of meeting the needs of older people, and can unnecessarily restrict independence within this age group.”
Policy H1 Housing Density	
SUPPORT	2
OBJECT	10
SUMMARY OF REPRESENTATIONS IN	<ul style="list-style-type: none"> • We anticipate that garden community densities will be covered in

Statement of Consultation
Summary of Reg 19 Representations Chapter 4 Housing

SUPPORT	<p>the DPD to be prepared for each. For West of Braintree the Braintree portion proposal is an average of 35 dwellings per ha and it is logical for the Uttlesford Plan to be consistent. (PSLP778 Galliard Homes)</p> <ul style="list-style-type: none"> • The density ranges are appropriate and reflect Government policy concerning efficient use of land and boosting housing supply.(PSLP908 Springfield Planning)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • The upper limit of the proposed housing densities is too high compared to comparable English regions.(PSLP684 Cllr R Freeman) • The proposed housing densities are too high and lead to poor design and lack of open space. It is not clear how these densities are compatible with garden community principles. (PSLP2239 We Are Residents) (PSLP3009 Cllr P Lees) • A blanket policy on density does not take into account the unique character of each area (PSLP2357 Takeley PC) • The policy is overly restrictive in seeking an upper range for housing density. The revised NPPF (2018) indicates that this policy does not comply with Government’s latest intentions in respect of housing densities. (PSLP2560 Bovis Homes) • Policy does not refer to Garden Communities (PSLP2612 Land Securities). • Density figures quoted appear rather arbitrary (PSLP2676 Persimmon Homes) • Policy should be omitted from the plan as suggesting densities of 30 to 50 dwellings per hectare could negatively impact the high quality and layout of development in the District as such densities within or adjacent to a settlement are unlikely to reflect the local context. (PSLP2764 Pegasi Management) • Policy is too restrictive and does not allow sufficient flexibility to adapt proposals to suite the particular local area. (PSLP2802 Gladman) • The policy is not backed up by any evidence. (PSLP2889 Taylor Wimpey)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Amend policy to say “upto” the number of dwellings per hectare. (PSLP2357 Takeley PC) • policy is reworded so that reference to a minimum housing density (PSLP2560 Bovis Homes) • Policy should be amended so that the new Garden Communities are expressly excluded from the policy, with housing density being addressed via the DPDs, or failing this, the same density range as for the major towns, Saffron Walden and Great Dunmow, should be applicable.(PSLP2612 Land Securities) • Housing density should be design led, supported by the NPPF’s requirements for quality design(PSLP2764 Pegasi Management) • Amend policy by removing the table. (PSLP2889 Taylor Wimpey)
Policy H2 Housing Mix	
SUPPORT	3
OBJECT	8
SUMMARY OF	<ul style="list-style-type: none"> • In planning for new garden communities, the Local Plan is entirely

Statement of Consultation
Summary of Reg 19 Representations Chapter 4 Housing

<p>REPRESENTATIONS IN SUPPORT</p>	<p>consistent with paragraph 72 of the NPPF. Part c) is especially relevant here as by following garden city principles it is recognised as a means of ensuring that a variety of homes to meet the needs of different groups in the community will be provided. (PSLP779 Galliard Homes)</p> <ul style="list-style-type: none"> • the policy does not seek to prescribe a rigid housing mix across the District and recognises that there are different areas with different housing needs across the District and that the Council will assess schemes having regard to local character, significance of heritage assets and the viability of the development on a site by site basis. (PSLP2561 Bovis Homes) (PSLP2830 Gladman)
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • We need to focus on 1, 2 and 3- bedroom houses; not the 4- and 5- bed mansions which encourage people to move into the district from outside, and which are utterly useless for ordinary people who grew up here. The large houses potentiate a move to 'Homes in Multiple Occupancy', as a way to mitigate the inadequate supply of smaller properties.(PSLP688 Cllr R Freeman) • There is no information on the model used in the SHMA to provide this mix of house types or that it takes into account local considerations. (PSLP751 Elsenham PC) • Para 4.2 claims that the greatest need is for 3 and 4 bedroom homes but this is contrary to paras 2.7 and 4.4 which refer to increasing single-occupancy need for older persons and also contrary to conclusion by Braintree DC that households with three or more dependent children would fall between 2013 and 2037 in all 4 districts within its SHMA.(PSLP895 K McDonald) • Disagree with the conclusions drawn from the SHMA and believe that 2 and 3 bedroom houses should be prioritised for market housing as well. (PSLP2240 We Are Residents) (PSLP2323 Saffron Walden TC) (PSLP2409 Littlebury PC) (PSLP2941 Saffron Walden and Little Walden Neighbourhood Plan Group) • There is no clear policy steer about the desired mix of housing to be built in Uttlesford during the Plan period. Without firm guidance, developers will continue to build for the upper end of the market rather than smaller units that younger people require to get onto the housing ladder.(PSLP2986 Uttlesford Liberal Democrats Local Party)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Reword the Policy to read: New housing developments will provide for a mix of house types and sizes to meet the different needs of the local area and the District as a whole, having regard to local character, significance of heritage assets and the viability of the development, which will be assessed on a site by site basis in consultation with town councils, parish councils and other interested parties. Assess all policies which draw on the ORS Housing Model. (PSLP751 Elsenham PC) • Policy should clarify the forecast needs for various types and size of housing and explain how this is due to be met. (PSLP895 K McDonald) • Delete emphasis on 4 bedroom homes. (PSLP2240 We Are Residents) • The policy should state that Policy H2 only applies if a preferred housing mix has not been identified in a respective Neighbourhood

	<p>Plan. (PSLP2240 We Are Residents)</p> <ul style="list-style-type: none"> The Plan should take a more positive approach to providing housing for people of all income levels and should ensure that the majority of new built housing is 2 or 3 bedroom until the market supply is rebalanced. (PSLP2323 Saffron Walden TC)
Policy H3 Subdivision of Dwellings and Dwellings in Multiple Occupancy	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
Policy H4 House Extensions and Replacement Dwellings in the Countryside and the Greenbelt	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> The policy applies to the whole Countryside, development restrictions linking position and size of proposed replacement dwelling to position and size of existing dwelling, which are not appropriate to areas outside the Green Belt, and which exceed those applied by paragraph 89 of the NPPF to Green Belt areas only.
MODIFICATION REQUEST	<p>Alternative Proposed Policy Wording</p> <p>1. Proposals to extend or replace dwellings within the area designated as Countryside or Countryside Protection Zone will be permitted provided that the proposal would not materially increase the impact of the dwelling on <u>is appropriate to the local context of the site</u>, the appearance of the surrounding countryside or the open character of the Countryside Protection Zone by virtue of its siting, scale and height, character and design.</p> <p>2. A replacement dwelling should be positioned on or close to the footprint of the existing dwelling, unless design, landscape, highway safety, residential amenity or other environmental grounds indicate that a more appropriate location on the plot can be justified.</p> <p>House extension and replacement dwellings within the Green Belt:</p> <p>3. House extensions will be permitted which would not result in disproportionate additions to the original dwelling or harm the purposes of the Green Belt; and</p> <p>4. Replacement dwellings should be positioned on or close to the footprint of the existing dwelling and will only be permitted if they are</p>

	<p>not materially larger than the one it replaces.</p> <p><u>4. Replacement dwellings will be permitted provided that the proposal does not harm the purposes of the Green Belt, is not materially larger than the dwelling being replaced, and is otherwise appropriate to the local context of the site and the appearance of the surrounding countryside by virtue of its scale and height. “</u></p> <p>Both within the Green Belt and beyond it account will be taken of the size of the existing dwelling, the extent to which it has previously been extended or could be extended under permitted development rights, and the character of the area.”</p>
Policy H5 Residential Developments Without Development Limits	
SUPPORT	0
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • the revised NPPF (24th July 2018) states at paragraph 68. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. (PSLP37 Cllr S Barker) • Experience on the UDC Planning Committee shows that developments in Uttlesford, including those 'outside development limits' seldom have sufficient green open space, and almost never have adequate sports provision. (PSLP689 cllr R Freeman) • Whilst there is a basic distinction between the 'within' and 'without' development type settlements, there is no justifiable reason for the wording for the criteria which deal with the same issue to vary. (PSLP2154 Henham PC) • Policy does not give policy on garden size. (PSLP2241 We Are Residents)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • The following uses the same wording for the same criteria which are common to both 'with development limits' and 'without limits' settlements: New criteria 1 'Development outside recognisable footprint of the settlement is regarded as being in the countryside such that Policy SP10 applies. Replace criteria 1-5 with: 2 It would be compatible with the character of the settlement and, depending on the location of the site, its countryside setting and natural environment; 3 The setting of existing buildings, the natural and historic environment (including Listed Buildings, Conservation Areas, Protected Lanes and Preserved Trees), and the character of the area are protected; 4 Development provides adequate amenity space and does not result in an unacceptable loss of amenity space; in accordance with the Essex Design Guide or subsequent guidance 5 There would be no material overlooking or overshadowing of neighbouring properties; 6 The development would not have an overbearing effect or cause

	<p>disturbance to neighbouring properties; 7 The resulting development would not result in unreasonable noise and disturbance to the occupiers of neighbouring properties from vehicles or any other cause. (PSLP2154 Henham PC)</p> <ul style="list-style-type: none"> • Policy to include specific minimum sizes for gardens in accordance with the Essex Design Guide; and the policy should state the garden space part of Policy H5 only applies if garden size not been identified in a respective Neighbourhood Plan. (PSLP2241 We Are Residents)
Policy H6 Affordable Housing	
SUPPORT	1
OBJECT	8
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Consider that the provision of affordable housing in the Garden Communities will be informed by the general policies of the local plan but the precise requirement will be a product of the special infrastructural and other needs of development at this scale, contained in the relevant DPD.
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Policy does not specify number of affordable houses in a cluster as described in paragraph 4.23 (PSLP321 Elsenham PC). • Affordable housing at WoBGC would be situated directly beneath the main take-off flight path at Stansted Airport. (PSLP749 Mrs Roe) • Policy H6 is at odds with the Monitoring Framework Appendix 2 target for affordable housing. Policy H6 requires 40% affordable housing, which with an annual housing requirement of 640 new homes equates to 256 affordable homes per annum. The target for objective 1a is only 150 affordable homes per annum, and therefore should be amended to 256. (PSLP2242 We Are Residents) • In the new settlements at least, it should not be necessary to agree less than the target 40% proportion of new developments being social housing. Priority should be given to local residents who do not wish to move away from their local area.(PSLP2410 Littlebury PC) • Missed opportunity by not referring to starter homes. Policy does not make it clear how evidence on viability of sites will be assessed. Do not consider Council's whole plan viability to be effective in supporting its policy on affordable housing. (PSLP2677 Persimmon) • Policy does not reflect widened definitions of affordable housing. (PSLP2780 Rentplus) • There does not appear to be any real strategy on how to make the 40% of houses really affordable. There is no real evidence that key workers for example will be able to afford to buy/rent these. This is an expensive housing area and how to identify real need is not apparent in the plan. (PSLP3010 Cllr Lees) • The Council's assessment of affordable housing need is flawed because it limits those in need to those on the most acute need, ignoring large groups, which are also likely to be in need. The affordable housing need is therefore likely to be a significant underestimate. It remains unclear on whether the 40%

	requirement for affordable housing is supported by sufficient evidence (PSLP2804 Gladman)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Prescribe a maximum cluster size of 10 for affordable housing (PSLP321 Elsenham PC) • To reflect the new definitions of affordable housing and to ensure the policy is sound, being compliant with national policy, we recommend the below amendments: The tenure mix of affordable housing should reflect <u>the national definitions of affordable housing including housing for rent and routes to home ownership, and</u> the most up to date local housing need evidence and viability on individual sites. • Delete final paragraph. (PSLP2780 Rentplus)
<u>Policy H7 Affordable Housing on Exception Sites.</u>	
SUPPORT	0
OBJECT	8
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Object to the policy allowing the inclusion of market housing as it leads to larger developments than necessary, conflicts with other parts of the plan and abuse of the policy allowing development in unsuitable locations. (PSLP1366 Ms E Ross) (PSLP2026 Hands off Thaxted)(PSLP2124 R Haynes) (PSLP2124 N Weakley) (PSLP3014 L Rulten) • It is accepted nationally that a Parish Housing Needs survey, carried out by a Rural Housing Enabler has a 'shelf life' of five years.(PSLP1712 English Rural Housing Association) • Parish and town councils should be consulted on exception sites before planning applications are made.(PSLP2327 Saffron Walden Town Council) (PSLP2943 Saffron Walden and Little Walden Neighbourhood Plan Group)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • No development on Exception Sites should be allowed on sites specifically identified within the Neighbourhood Plan as not to be developed. (PSLP1366 Ms E Ross) • Amend policy to refer to a housing needs survey being prepared within the last 5 years instead of 3 years. (PSLP1712 English Rural Housing Association) • Policy H7 should be amended so that reference to market housing is removed and affordable houses could still be built in areas outside the development limits but would only be allowed where it was funded by a housing association as already (PSLP2026 Hands off Thaxted) (PSLP2124 R Haynes) • Policy amended allowing only sites identified in Local Plans or Neighbourhood plans. (PSLP2127 N Weakley) (PSLP3014 L Rulten) • Wording of Part 4 of the policy should be amended to ensure that the viability assessments are open book and that the specialists conducting the assessments will be agreed by the council. (PSLP2327 Saffron Walden Town Council) (PSLP2943 Saffron Walden and Little Walden Neighbourhood Plan Group)

Policy H8 Self-Build & Custom Housing	
SUPPORT	0
OBJECT	9
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Policy does not define what is meant by 'Strategic Sites'. (PSLP805 Carter Jonas) • Object to policy requiring unsold sites being offered to the local authority to deliver additional affordable housing. (PSLP805 Carter Jonas) (PSLP2525 HBF) (PSLP2614 Land Securities) (PSLP2678 Persimmon) (PSLP2805 Gladman) • Marketing time period of 3 years is excessive and could lead to undeveloped plots within completed sites or sites nearing completion. (PSLP805 Carter Jonas) (PSLP2678 Persimmon) • The policy supports self-build plots but fails to provide a number, which effectively means that they will not be brought forward. (PSLP2329 Saffron Walden TC) (PSLP2944 Saffron Walden and Little Walden Neighbourhood Plan group) • Policy does not help deliver the number of Self /Custom build homes being suggested by the Register.(PSLP2838 St Edmunds Lane Management) (PSLP2878 EA Securities)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Policy H 8 be amended to confirm the definition of strategic sites. The policy should also be reworded to clarify that it is only those self-build plots being delivered as part of the affordable housing offering that first need to be offered back to the Council before being released to the open market. And finally the required period of marketing should be capped to 18 months. (PSLP805 Carter Jonas) • The previous draft of the Local Plan specified 5% of plots on major development should be allocated to self-build and the Town Council would like to see this figure added back in. (PSLP2329 Saffron Walden TC) (PSLP2944 Saffron Walden and Little Walden Neighbourhood Plan group) • The following changes to proposed policy H8 should be made: 'Self and Custom Build proposals will be supported where they seek to address the need and demand for self and custom build housing and: 1. The site is located within outside of, but adjacent to development limits; 2. Are of high quality design and accord with plot passports (where appropriate); 3. Are constructed sustainably and are energy efficient; and 4. Do not conflict with other policies in the Local Plan. Self and Custom Build proposals will be supported as part of the Garden Communities and strategic sites.' (PSLP2838 St Edmunds Lane Management) • Policy H8 is amended as below: 'If Self or Custom Build plots are not sold after being marketed appropriately for 2412 months, then they should remain on the open market as Self or Custom Build plots or be offered to the Council as land to deliver additional affordable housing. If there is no interest from the above after a further 12 months then the developer can build out the site as open market housing.'(PSLP2525 HBF)(PSLP2678 Persimmon)

	<ul style="list-style-type: none"> • Policy is reworded, so that this requirement only relates to sites that have not delivered 40% affordable housing, and is subject to viability testing. If the sites are to be offered at residential land value, this has different implications to a discounted offer, and therefore needs to be clarified in order to establish if the policy could be made sound.(PSLP2613 Land Securities) • Amendment to Policy H8 (Self-Build and Custom Units): Point 1 to be amended to 1. The site is located OUTSIDE OF, BUT ADJACENT TO development limits;
Policy H9 Sites for Gypsies, Travellers and Travelling Showpeople	
SUPPORT	0
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Criterion 1 is unacceptable and discriminatory because no such pre-requirement would be imposed on a traditional housing application. Criterion 6 is unreasonable in requiring connection to mains drainage.(PSLP2443 National Federation of Gypsy Liaison Groups) • As the GTAA reports that there is no need for additional pitches for households which meet the definition, there is no basis therefore to suggest that provision should be made for households that meet the definition, or even households which do not meet the definition. Policy should make clear that in ‘adequately demonstrating a need’ this is on the same basis that the assessment was made in the GTAA (ie fulfil PPTS definition and no other sites within or outside the District available).Criteria 2 and 4 are related and should be combined (PSLP2158 Henham PC)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Delete criterion 1 and omit drainage from criterion 6. .(PSLP2443 National Federation of Gypsy Liaison Groups) • para 4.43 - delete <i>“a need for up to 8 additional pitches for Gypsy and Traveller households that may meet the planning definition; and a need for 10 additional pitches for Gypsy and Traveller households who do not meet the planning definition.”</i> para 4.43 - add <i>“in order to meet criterion 1 pf Policy H9 applicants must demonstration of need must be on the same basis that assessment was made in the GTAA i.e. that the applicant fulfils the PPTS definition and that after a fully documented survey there are no other sites available (which may involve also looking outside the District boundary)”.</i> Policy H 9 - combine criteria 2 and 4 : The site is located in a sustainable location, well related to a settlement with a range of services and facilities, including a primary school and healthcare facilities; and that the site has safe pedestrian access to those services and facilities, including a primary school. There must also be adequate vehicular access to and from the public highway and the site must provide adequate space for parking, turning and servicing. (PSLP2158 Henham PC)

Policy H10 Accessible and Adaptable Homes	
SUPPORT	0
OBJECT	14
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • No evident strategy that the objective of the policy will be achieved. (PSLP331 Elsenham PC) • Policy in conjunction with Policy H2 does not address the needs of Uttlesford's ageing population, and creates a shortage of new private housing bungalows (PSLP738 S Johnson) • Object to requirement in policy for dwellings to meet M4(2) Category 2 and Category 3 M4(3)). Policy does not comply with PPG paragraph 56-007 and 009. (PSLP1983 McCarthy and Stone) (PSLP2526 HBF) (PSLP2563 Bovis Homes). (PSLP2614 Land Securities) (PSLP2806 Gladman)(PSLP2885 Taylor Wimpey)(PSLP2905 Grant and Bloor) (PSLP2679 Persimmon) • Policy should ask for 15% for both market and affordable housing to meet Category 3 (M4(3)) requirements. (PSLP2332 Saffron Walden Town Council) (PSLP2945 Saffron Walden and Little Walden Neighbourhood Plan Group) • Policy H10 fails to recognise that ageing households may wish to remain in the place they currently live. Whilst the policy recognises housing design requirements, it lacks location requirements.(PSLP2748 Pegasi Management)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Consult parish councils concerning provision of housing for the elderly. Make provision for a strategy which ensures that adequate housing for the elderly is available. Make the HAPPI principles generally available. Ensure more bungalows are built, particularly private bungalows. Delete the words 'or financially viable'.(PSLP 331 Elsenham PC) • The strategy and policy that determines the current 5% bungalows target should be re-examined and either the target level be raised to a higher level (say 7 - 10 %), or an alternative, more flexible and innovative methodology and policy is found that will provide more bungalows, particularly an increase in privately-owned bungalows.(PSLP738 S Johnson) • Deletion of reference to '10% of market housing and 15% of affordable housing will be required to meet Category 3 (M4(3)) requirements (Wheelchair user dwellings)'.(PSLP1983 McCarthy and Stone)(PSLP2526 HBF) (PSLP2563 Bovis Homes)(PSLP2614 Land Securities))(PSLP2905 Grant and Bloor) (PSLP2679 Persimmon) • Amend policy 'New housing must be designed and constructed in a way that enables it to be adapted to meet the changing needs of its occupants over time. For this reason the Council requires all new housing on sites of 11 or more dwellings (market and affordable) to meet the optional Building Regulations Requirement M4(2): Category 2 (Accessible and Adaptable Dwellings), <u>where there is an identified need</u>. 10% of market housing and 15% of affordable housing will be required to meet Category 3 (M4(3))

	<p>requirements (Wheelchair user dwellings). (PSLP2885 Taylor Wimpey)</p> <ul style="list-style-type: none"> • Policy should ask for 15% for both market and affordable housing to meet Category 3 (M4(3)) requirements. (PSLP2332 Saffron Walden Town Council) (PSLP2945 Saffron Walden and Little Walden Neighbourhood Plan Group) • As the District is predominately rural it should be considered that an additional Rural Exception Policy is included to allow developments of accessible and adaptable dwellings on sites that are well related to but beyond any settlements.(PSLP2748 Pegasi Management)
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Uttlesford District Council Regulation 19 Pre-submission Local Plan; Summary of Responses	
Section / Paragraph / Policy	Summary of Responses
Policy H11 Specialist Housing	
SUPPORT	1
OBJECT	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Supports policy as a mechanism of securing specialist accommodation such as care facilities. (PSLP2825 Endurance Estates)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Policy does not ensure that specialist housing will in fact be provided.(PSLP284 Elsenham PC) • The Policy and supporting text now proposed is not an encouraging policy but one that is criteria led, and some of those criteria may have a negative effect on provision and is therefore not positively prepared, justified and effective (PSLP1983 McCarthy and Stone) • Local Plan could elaborate of the proposed policy in relation to the provision of specialist accommodation for older people.(PSLP2807 Gladman)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Include a policy which will ensure that specialist housing will be provided. (PSLP284 Elsenham PC) • Replace policy with <i>“The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations. The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances and to actively encourage developers to build new homes so that they can be readily adapted to meet the needs of those with disabilities and the elderly as well as assisting independent living at home. The Council will, through the identification of sites, allowing for windfall developments, and / or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities.”</i> If policy remains criteria 2 and 3 should be deleted. Remove reference in paragraph 4.49 to 10 HAPPI principles and

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	delete “and whether the units are self-contained” (PSLP1983 McCarthy and Stone)
Policy H12 Agricultural / Rural Workers Development	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	

Uttlesford District Council Regulation 19 Pre-submission Local Plan; Summary of Responses	
Section / Paragraph / Policy	Summary of Responses
5. Employment	
SUPPORT	1
OBJECT	8
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Paragraph 5.50. The siting of employment land should be carefully considered so that it is readily accessible to the transport system and to living areas. (Sustainable Uttlesford; PSLP 2039).
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Setting two new Garden Communities (approximately an additional 40,000 residents) will increase the demand for well paid, high end jobs that do not exist in the numbers required. Simple office jobs and jobs in retail will not be sufficient to sustain these communities which will be reliant on commuting to other centres. Increase in pollution and increased levels of traffic on an already strained infrastructure. Majority of Stansted Employees reside outside of the district. No Guarantee that Stansted Airport will expand given current uncertainties. Parking implications at The Airport. People will not live in the area if there is not enough employment. Paragraph 5.6 & 5.52 Existing Employment Areas; Intention is to promote industrial uses (B & Sui Generis) in existing employment areas but not to prevent existing non-industrial uses expanding or to confine future changes in their use only to industrial use categories. In order to be consistent with policies EMP1 and EMP2, and acknowledge that complementary existing uses, including non-industrial and sui generis uses, contribute to the aims of the plan in designated employment areas, it is requested that the text is revised. (Aldis of Barking; PLSP2209 & 2215) Most of the jobs in Uttlesford are filled by residents who live outside of the district and most Uttlesford residents out commute for work – nothing in the evidence base to suggest that this will change. (weareresidents.org; PLSP2244) Paragraph 5.14 mentions is made in paragraph 5.14 of a preferred scenario for jobs growth that would result in a figure of 16,000 additional jobs in Uttlesford over the plan period. estimates of future employment by the airport owners are notoriously optimistic and it is not clear how the figure of 10,000 jobs was calculated. This would indicate that the jobs growth figure at the airport over the Plan period would only be the region of 700 - 2,300. This, in turn, would lead to an employment deficit for the SHMA area of over 10,000 jobs one of the basic rules for garden settlements is that sufficient jobs must be created to match the number of dwellings, typically

	<p>one per new household. There is clearly a very material deficiency of new employment that the draft Local Plan fails to even acknowledge.</p> <ul style="list-style-type: none"> • Many of the employment sites identified are small. Identifying larger potential employment sites should be a priority to attract larger businesses and a greater range of employment. (Littlebury Parish Council; PLSP2314) • The plan relies heavily on residents of new settlements working locally to achieve sustainable communities, but there is little detail on how this will be achieved. In North Uttlesford, there is the opportunity to bring in large numbers of high skill and ancillary jobs by attracting high tech companies from Cambridge, as we understand that some are now unable to find single sites there of sufficient size for their long term needs. (Littlebury Parish Council; PLSP2314)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Paragraph 5.50 The siting of employment land should be carefully considered so that it is readily accessible to the transport system and to living areas. (Sustainable Uttlesford; PSLP 2039) • PARAGRAPH 5.52 This paragraph provides an introduction to Policy EMP2 and its objective, as defined by Point 8 of EMP1, is amended to address the manner in which proposals for locating non-employment uses on existing industrial estates will be assessed. This approach accords with national and local planning policy, which has to-date allowed for expansion of the established use on the Hoblongs employment area and provision of an A3 restaurant, thus securing employment generation within the area. Again, in order not to be unduly restrictive towards existing established Non-B class uses which make an important contribution to existing employment areas, we would suggest that the text is revised. (Aldis of Barkingside; PSLP 2215) • Revise paragraph 5.6 to include the following sentence after the fifth bullet point: However, employment land can also contain existing sui-generis and non-industrial, employment generating uses which complement existing B-class uses and make a contribution to employment provision, promoting the aims of sustainable business growth within the District (Aldi's of Barkingside; PSLP 2209) • No specific figures for the amount of employment land or floor-space to be provided at each of the communities. He considered it was inappropriate to delegate this role to the individual DPDs. (Galliard Homes; PLSP 781) •
Policy EMP1 Employment Strategy	
SUPPORT	7
OBJECT	19
SUMMARY OF REPRESENTATIONS IN	<ul style="list-style-type: none"> • Supportive of 5.40 and EMP 1 which confirms that the new

<p>SUPPORT</p>	<p>Garden Communities will provide a range of B Class employment uses (Andrewsfield New Settlement Consortium (ANSC); PSLP 2011)</p> <ul style="list-style-type: none"> • Supportive of the delivery of ultrafast, high speed broadband to all businesses and homes within the development to facilitate home working and reduce the need for travel (ANSC; PLSP2011) • LtCHE1 Supports the development of Chesterford Research Park and provide additional jobs in easy commuting distance from NUGC and the delivery of B class uses in Garden communities. (Aviva Life & Pensions; PSLP2027) • It is vital that local plans contain policies that positively and proactively encourage the scale of development that is required to support the delivery of sustainable economic growth and in doing so contribute towards building a strong, competitive economy both locally and nationally. (Gladman; PLSP2808) • Supportive of the net increase of 14,000 new jobs in the local Plan Period and accommodate new employment opportunities in the district including Chesterford Research Park and NUGC. (Grosvenor, PSLP978) • We generally support policy EMP1 Employment Strategy and in particular point 10 which states, Council will support the provision of small scale office units to accommodate the needs of small sized businesses including incubator and grow on space. (PSLP2550)
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • Paragraph 5.25 Inconsistent with other references to the North side of the Airport Site. (MAG; PSLP 1520) • Para 5.25 Inconsistent with the employment land review 2017. The inclusion of this restriction which is not justified in any part of the plan and is unjustified and cannot be considered as effective or positively prepared. (MAG; PSLP 1520) • Policy unsound as it suggests the Pulse Packaging Site is allocated as an employment site is not justified (The Joint Administrators of Pulse Packaging; PLSP1672) • Point 5 does not acknowledge the value of existing non-B-uses established within these areas and the need to protect them and promote their employment generating capacity. Point 5 uses the term economic development uses to protect those uses for which a loss in floor space must be resisted. (Aldi's of Barking; PSLP2202) • Too dependent on growth at the airport and Chesterford Research Park, the latter of which has underperformed and is too car dependant with little connectivity to more sustainable transport (Wendens Ambo Parish Council; PSLP 2435,2437) • Given the sensitive location of some of the existing and proposed employment allocations, such as London Stansted Airport, Natural England advises that this policy include a

	<p>requirement for development to mitigate any direct or indirect adverse impacts to designated sites such as Epping Forest SAC, Hatfield Forest and other designated sites (Natural England; PSLP2460)</p> <ul style="list-style-type: none"> • As drafted, this confirms that any redevelopment that will result in the loss of floor space for economic development uses will be resisted. Paragraph 22 of NPPF1 reads as follows Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. (Carter Jonas; PSLP811) • Employment chapter seems to be predicated on the basis of the ELR medium scenario requirement for a net additional 10.2 ha of land for industrial use. The West Essex and East Hertfordshire Assessment of Employment Needs report identifies a much greater need for employment land (22-24 ha) in Uttlesford District, driven by demand for B8 accommodation. Growth Commission proposals for growth2 in the London Stansted Cambridge Corridor (LSCC), promote more substantial employment land provision in Uttlesford, taking advantage of improvements to the West Anglia Mainline (WAML) and the expansion of the Stansted Airport branch. (Pigeon Investment Management Ltd; PSLP 2739) • EMP1 and SP10 However, East Herts Council would like to request that Uttlesford District Council allocates land to the north of Bishop Stortford on land to the rear of Goodliffe Park on Stansted Road to facilitate the expansion of the employment area. The employment area at Goodliffe Park is currently constrained only by the presence of the district boundary and the presence of Green Belt. This was requested at the Regulation 18 consultation. (East Herts District Council; PSLP2499). • There is no clear economic strategy. Allocated employment sites have no bearing on where jobs are likely to be created, or which areas have good transport connections, or are attractive for employers. Additionally new employment land sites have been identified where employers do not want to be, and in locations where protected employment sites are already being converted to housing because of a lack demand by businesses and other employers. (R4U; PLSP2593) • Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative use of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable communities. (Carter Jonas; PSLP811) • It would clearly be illogical to deliver most of the new homes within new settlements whilst most of the planned
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	<p>commercial growth is delivered elsewhere in the district. A clear commitment to directing the planned employment growth (the 14,000 jobs target has been specifically identified to support the planned housing growth, see paragraph 3.76 of the PSULP)) to locations well connected to the planned housing growth needs to form the corner stone of Policy EMP1. Simply offering support for the provision of commercial uses is not sufficient to ensure that the required quantum and mix of commercial floor space that is required to deliver sustainable forms of growth will be delivered. (Carter Jonas; PSLP 811)</p> <ul style="list-style-type: none"> • It is unclear if the net floor space requirements are allocated to any site, as broadly required by the NPPF and the Planning Practice Guidance (PPG) to enable effective delivery and monitoring. (Essex County Council; PSLP912) • It is also not clear if the 55 ha at Stansted Airport is over and above any required need or when this is expected to come forward. • Principal Employment Areas within the Green Belt are further constrained from expansion and intensification by virtue of the fact that they have not been inset from the Green Belt. As such, the identification of these Principal Employment Areas serves little purpose in regard to encouraging growth and intensification of employment areas and is in fact more restrictive than if the site were not identified as an employment site, on the basis that it stipulates uses be restricted to B1, B2, B8 or complimentary suis generis uses. (WRC Morton Trust; PSLP941) • Part 7 of policy EMP1 refers to displacement of existing businesses lost to other uses and states that the council will seek to mitigate any adverse effects. However, no provision is made to accommodate these displaced businesses. (WRC Morton Trust; PSLP941)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • The text contained in brackets (other than those which constitute strategic warehousing) should be deleted. (MAG; PSLP 1520) • Point 1 of Policy EMP1 needs to define the quantum and mix of employment uses that are to be delivered within the three Garden Community sites. In order to be consistent with national policy. (Carter Jonas; PSLP811)
Policy EMP2 Existing and Proposed Employment Areas	
SUPPORT	1
OBJECT	7
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • The policy recognises that there is a significant amount of employment in complimentary sui-generis uses. Therefore, our proposals to locate the Councils lorry deport and a Classic car

	repairs and storage business would be fully in accordance with this policy. (PSLP2551).
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Concerns surrounding applicant requirement that employment use is no longer viable as per appendix 5 of the plan. (The Joint administrators of Pulse Packaging; PLSP1679) The inference that offices, warehouses, industrial and complementary sui generis uses are the only compatible uses which will generate employment is therefore incorrect and inconsistent with National Policy. (Adli's of Barkingside; PSLP2222) the policy does not acknowledge the important role of supporting uses in establishing successful business parks. Our representation regarding EMP1 sets out our concern regarding the restrictive approach to supporting uses such as cafes within Principal Employment Areas given the importance of these uses to creating a vibrant and successful business park environment (Jackson Management; PSLP793) Object to the restrictive nature of this policy. (WRC Morton Trust; PSLP942) Unsupportive of intensification/expansion of the Principal Employment Areas for employment uses, contrary to the recommendations of the Employment Land Review Update 2017. 2. (WRC Morton Trust; PSLP942)
MODIFICATION REQUEST	<ul style="list-style-type: none"> The policy should be reworded to focus on the restriction of non-employment generating uses rather than focus on safeguarding only industrial and sui generis uses. (Adli's of Barkingside; PSLP2222) Existing and proposed employment areas identified as such on the policies map will be safeguarded for offices, warehouses, industrial, and complimentary sui generis uses <u>and auxiliary employment uses which support these uses (for example cafes, nurseries or gyms). Planning permission will be granted for the above uses within the Principal Employment Areas.</u> Planning permission will only be granted for the change of use or redevelopment or extension of sites or premises in these areas for uses other than those identified above in exceptional circumstances where either criterion a) is met or criteria b) and c) are met (Jackson Management; PLSP793)
<u>Policy EMP3 Non-Estate Employment Uses</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
<u>Policy EMP4 Rural Economy</u>	

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SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Policy too restrictive to sustainable development and contrary to the NPPF (Jackson Management; PSLP795)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Proposals which sustain and enhance the rural economy by creating and/or safeguarding businesses and jobs will be supported where they are of an appropriate scale to their location, protect the environmental quality and character of the rural area and protect the best and most versatile agricultural land (Grades 1, 2 and 3a). The following types of development are considered to be acceptable: <ol style="list-style-type: none"> Schemes for farm diversification involving small-scale business and commercial development that contribute to the operation and viability of the farm holding <u>and are an appropriate scale to their location;</u> Small-scale tourism proposals, including visitor accommodation <u>where they are an appropriate scale to their location;</u> Proposals that recognise the economic benefits of the natural and historic environment as an asset to be valued, conserved and enhanced; The expansion of businesses in their existing locations dependent upon the nature of the activities involved and provided the development does not conflict with other policies in the Local Plan; Small-scale employment development <u>at an appropriate scale</u> to its location; to meet local needs; The use of land for agriculture, forestry and equestrian activity; The re-use of rural buildings will be supported provided that; and The redevelopment of a rural building does not lead to the conversion of annexes and buildings into separate dwellings. (Jackson Management; PSLP795)

Uttlesford District Council Regulation 19 Pre-submission Local Plan; Summary of Responses	
Section / Paragraph / Policy	Summary of Responses
6. RETAIL	
SUPPORT	0
OBJECT	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Para 6.17 – Eventually the garden villages will have enough properties to cater for regular retail needs within the settlement but at the outset daily retail needs need to be met to minimise traffic movements and develop the community. (Littlebury Parish Council PSLP 2415) • Para 6.16 – Objection to further goods provision in Saffron Walden as Tesco’s failure to implement planning permission for expansion of existing store supports the lack of need for further expansion; • Para 6.17 – Objection to suggestion that new garden communities should provide top-up shopping facilities only and each settlement should be required to have full provision of main food and comparison shopping facilities. Failure to provide these would be unsustainable and lead to further pressure on existing facilities (WeAreResidents.org PSLP 2245) • Two new self-contained Garden Communities in close proximity to Braintree and Great Dunmow will further destroy high street retailers. Question whether a full study has been undertaken to protect existing communities. (PSLP 29)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Para 6.16 should be redrafted, and the new settlement policies amended , to require that they have a proper retail offering, satisfying main food, top-up and comparison shopping needs for their residents; and • Para 6.17 should be amended to require both town centre provision in each of the new garden communities and local centre provision in those parts of the communities which are too far from the centres for easy walking (WeAreResidents.org PSLP 2245) • The settlement of 2 new self-contained Garden communities in close proximity to Braintree and Great Dunmow introducing low end retail employment and services will further destroy the high street retailers within the existing communities who are unlikely to receive the benefit from the self-contained communities and will potentially attract business away from them. Has a fully and honest study been undertaken to protect the existing communities? (PSLP 29)
Policy RET1 Town and Local Centres	
SUPPORT	2
OBJECT	9
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Support the identification of Thaxted as a 'Local Centre' as Thaxted plays an important role in providing for the local community and tourists. It is important new retail opportunities are supported in the village to ensure its longer

	<p>term vitality and viability (Countryside UK Ltd. PSLP 2773)</p> <ul style="list-style-type: none"> • The Andrewsfield New Settlement Consortium (ANSC) supports policy RET1, requiring the provision of local centres at each of the three proposed Garden Communities. Further detailed master planning relating to the local centres for the WBG will need to be progressed through a master planning process for each garden community. (Andrewsfield New Settlement Consortium PSLP 2012)
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • The Retail Study 2018 indicates that there will be a need for an additional small to medium sized foodstore in Saffron Walden, but the Plan makes no allocation for such a space. This indicates either that the Plan does not support the findings of the Retail Study, or that it is deficient in its allocation of spaces. (Saffron Walden and Little Walden Neighbourhood Plan PSLP 2947) • The phrase “The presumption is therefore that new retail development is first provided in the existing town centres to preserve their vitality and viability” is not strong enough alone. (Saffron Walden and Little Walden Neighbourhood Plan PSLP 2947) • The growth of on line shopping, and its impact on established shopping centres is not addressed; and • Out of town retail should be minimised (Littlebury Parish Council 2416) • There is no site in the town centre of Saffron Walden so any such food store would necessarily be out of town in breach of the NPPF “town centre first” policy. We note the lack of proposed retail provision in any of the new settlements (a small top up shop in each only) and that the Plan is therefore proposing out of town retail development in SW which should be provided in the new settlement. This is therefore an unsustainable policy (Saffron Walden Town Council PSLP 2336). • Great Dunmow’s single supermarket is struggling to cope with meeting local needs and a new out of town supermarket is needed if more development is to go ahead. • Para 6.7 - It is stated at 6.7 that ‘the Local Plan seeks to address the loss of village services where possible’. Elsenham Parish Council is unable to discern any policy through which this laudable objective might be achieved. (Elsenham Parish Council PSLP 276) • We object to Policy RET1 and the retail hierarchy proposed. Each of the proposed new settlements would be significantly bigger than Great Dunmow, and Easton Park Garden Community would be bigger than Saffron Walden. Despite this they are all proposed to be below even Thaxted and Stansted Mountfitchet in the retail hierarchy. None of them can possibly therefore achieve the stated intention to show a high degree of self-containment. • In relation to Policy RET1, we note also that, by reason of this proposed hierarchy, the Retail Study May 2018 proposes no significant retail provision for any of the new settlements, and

	<p>instead proposes that almost all of the projected retail capacity increase in the district should be situated in either Saffron Walden or Great Dunmow. This is clearly unsustainable:</p> <ol style="list-style-type: none"> a. It increases rather than reduces the need to travel, contrary to the NPPF requirements; b. It is contrary to the stated intentions that the new settlements should be largely self-contained; c. It is contrary to the Council’s suggestion that the new settlements would show a considerably higher level of sustainable travel than currently exists in the district; d. It is contrary to the “town centre” first policy required by the NPPF in that it would increase the out of town retail provision in Great Dunmow and Saffron Walden to serve the new settlements, which additional provision would directly compete with the town centres. <ul style="list-style-type: none"> • The May 2018 Retail Study is therefore not fit for purpose as part of the Evidence Base, being based entirely on the pre-determined retail hierarchy, rather than being used to inform it; • We also object to the suggestion that a small to medium convenience store is required in Saffron Walden when there is no identified land for it, and the need would be driven purely by the new settlement development (outside of Saffron Walden, which is hardly ‘convenient’ for new householders); • Finally we object to the presumption set out in the final paragraph that new retail provision should be provided in the existing town centres, when it is obvious that the land does not exist for this, and when the draft Plan does not identify the land. Clearly, the potential retail sites which do exist should be preferred, but given their small size the Policy should properly provide for non-out of town provision for any additional facilities, almost certainly in the new settlements. (WeAreResidents.org PSLP 2246).
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Should be re-worded so that it is stronger. The applicant must be required to carry out an impact assessment on existing retail premises as well as on standard planning matters such as environment and traffic generation; • Retail premises outside the town centre must have rateable values set at the same rate as town centre premises to give all retailers a level playing field on which to compete. Retail premises outside the town centre must have their car parks included in the rateable value of the space to enable town centre retailers to compete on a level playing field (Saffron Walden and Little Walden Neighbourhood Plan PSLP 2947) • Include a Policy whereby the loss of village services might be rectified.(Elsenham Parish Council PSLP 276) • Policy RET1 should be redrafted so that; the new settlement sites should be on a par with Great Dunmow and Saffron Walden, and it should be clear that satisfying the needs of the new settlement sites by increasing provision in Saffron Walden and Great Dunmow is clearly unsustainable.

	(WeAreResidents.org PSLP 2246).
<u>Policy RET2 The Location and Impact of New Retail Development</u>	
SUPPORT	0
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • The Policies Map that accompanies the Pre-Submission Local Plan confirms that the Homebase site is not designated for any purpose or use (HHGL PSLP 1605). • The intent of Policy RET2 is supported. However, there is no such available space for any significant retail development in the centres of either Saffron Walden or Great Dunmow. Any development would therefore necessarily be out of town and contrary to NPPF policy requirements. This should be taken into account in assessing whether the retail proposals are sustainable or not; and • Any increase in retail provision is entirely unsupported by any transport modelling work. Given that ECC Highways has found that the Saffron Walden road network cannot accommodate significant further new housing, there is no reason to suppose that it can accommodate further retail traffic either. (WeAreResidents.org PSLP 2246).
MODIFICATION REQUEST	<ul style="list-style-type: none"> • The Homebase site is designated as a Retail Warehouse Area on the Policies Map and either subject to a new Policy or as an add-on to Policy RET2 that seeks to safeguard it for that purpose. (HHGL PSLP 1605).
<u>Policy RET3 Town and Local Centres and Shopping Frontages</u>	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • This policy on the basis that it is unclear and imprecise. Policy RET3 refers to the requirements of Appendix 5, yet Appendix 5 states that it applies only to policies EMP1, EMP2, RET1 and RET2. As a consequence, it is not clear what the relevant test of viability and requirement for marketing are so does not give a clear indication of how a decision maker should react to a development proposal. The final sentence is unnecessary as this relates to built form and is adequately covered by policy D1.(Sworders PSLP 847)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Delete final sentence; and • Other changes references under our comments to Appendix 5. (Sworders PSLP 847)
<u>Policy RET4 Loss of Shops and Other Facilities</u>	
SUPPORT	0
OBJECT	2
SUMMARY OF REPRESENTATIONS IN	

SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Generally supportive of the intention of the policy, and the marketing criteria set out in Appendix 5 are robust, although for conformity with the NPPF the policy and its supporting text should refer to cultural facilities either within the policy itself or within the supporting paragraphs. This would also support Objective 1d which seeks to protect and enhance existing local services which include cultural uses. The Trust previously highlighted the current weakness of policy in adequately protecting cultural uses in our previous submission. Unless such an amendment is made, the policy will not be in full conformity with the NPPF (both 2012 and 2018 versions)(Theatres Trust PSLP 1577). • Objection to this policy on the basis that it is unclear and imprecise. Policy RET4 refers to the requirements of Appendix 5, yet Appendix 5 states that it applies only to policies EMP1, EMP2, RET1 and RET2. As a consequence, it is not clear what the relevant test of viability and requirement for marketing are so does not give a clear indication of how a decision maker should react to a development proposal. • The title of the policy should be Loss of Village Shops and Community Facilities rather than “other” facilities as “other” is unclear in its meaning, rendering the policy imprecise. • Point 1 does not aid the decision maker; it is irrelevant. Point 3 will adequately demonstrate whether there is demand through marketing. (Sworders PSLP 848)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Addition of reference to cultural facilities within either the policy text to RET4 or supporting paragraphs 6.21-6.22. (Theatres Trust PSLP 1577). • Delete Point 1; and • Other changes references under our comments to Appendix 5 (Sworders PSLP 848)
Policy RET5 New Shops in Rural Areas	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	

<u>Uttlesford District Council Regulation 19 Pre-submission Local Plan; Summary of Responses</u>	
Section / Paragraph / Policy	Summary of Responses
7. Transport	
SUPPORT	5
OBJECT	39
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Para 7.11 - supportive of this approach and do not raise any objections (Chelmsford City Council PSLP1778)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Paragraph 7.3. HCC's LTP4 includes changes such as the new policy 1/request reflects LTP4s policy 1/its hierarchy (Herts County Council PSLP2655) • Paragraphs 7.8-7.9 Transport study for Saffron Walden not up to date (PSLP2250 WeAreResidents.org) • Paragraph 7.13 Include HCC in list of organisations District Council will work in facilitating the opportunity to make best use of public transport and access to facilities on areas of growth (Herts County Council PSLP2655) • Paragraph 7.13 support requirement for new development to link to existing facilities by cycle/pedestrian paths - but will not be delivered (PSLP2250 WeAreResidents.org) • Paragraph 7.15 - Flitch Way not just for walking and cycling/all users/add specific intention to improve access/safety above M11 J8 and link up severed sections(Flitch Way Action Group PSLP628) • Paragraph 7.16 - Include additional wording on modal shift as suggested in previous comments (Braintree Council PSLP2063) • Paragraph 7.16 Modal shift approach - while NUGC will generate significant movements located where need to travel can be minimised. Future proposals supported by overarching travel plan/plans for each landuse with measures, infrastructure and incentives. Care with terminology/ambitious modal shift target does not equate to a guaranteed ambitious mode share/express as modal share not modal shift/amend <i>"For Garden Communities a more ambitious non-car mode share shift away from single occupancy vehicle trip is required to reduce the impact on the highway network.</i> (Grosvenor PSLP953) • Paragraph 7.17 – Travel plans need targets/measures (PSLP2345 Saffron Walden Town Council) • Paragraph 7.18 while sound, unclear if applies to all developers/Add to 1 a Travel Plan Coordinator is only required for major development sites/a threshold. 2. Refer to possible co-ordination/ sharing of travel planning opportunities across the various A120 Garden Communities to maximise sustainable travel profile/reducing dependency upon car/single occupancy (Essex County Council PSLP916) • Paragraph 7.18 - While third sentence sound amend to: reducing dependency upon the private car and single occupancy of private car trip (Essex County Council PSLP917)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Paragraph 7.3. reflects LTP4s policy 1/its hierarchy (Herts County Council PSLP2655) • Paragraph 7.13 Include HCC in list of organisations District Council will work in facilitating the opportunity to make best use of public transport and access to facilities on areas of growth (Herts County Council

	<p>PSLP2655)</p> <ul style="list-style-type: none"> • Paragraph 7.15 -add specific intention to improve access/safety above M11 J8 and link up severed sections • Paragraph 7.16 - Include additional wording on modal shift as suggested in previous comments (Braintree Council PSLP2063) • Paragraph 7.16 Modal shift amend <i>“For Garden Communities a more ambitious non-car mode share shift away from single occupancy vehicle trip is required to reduce the impact on the highway network.</i> (Grosvenor PSLP953) • Paragraph 7.17 – Travel plans need targets/measures (PSLP2345 Saffron Walden Town Council) • Paragraph 7.18 Add to 1 a Travel Plan Coordinator is only required for major development sites/a threshold. 2. Refer to possible co-ordination/ sharing of travel planning opportunities across the various A120 Garden Communities to maximise sustainable travel profile/reducing dependency upon car/single occupancy (Essex County Council PSLP916) • Paragraph 7.18 - amend to: reducing dependency upon the private car and single occupancy of private car trip (Essex County Council PSLP917)
Policy TA1 Accessible Development	
SUPPORT	2
OBJECT	24
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Content with the assessment undertaken. The transport evidence suggests development in Uttlesford will not have severe impacts on the Suffolk highway network (Suffolk County Council PSLP2384)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Can no longer financially support unviable services so simply refer to provision of timetable information (Essex County Council PSLP914) • New developments to be connected by safe walking cycling routes to local facilities/require development to contribute to improving existing sustainable transport links/Saffron Walden’s poor/need huge improvement, Travel Plans must have measurable outcomes (PSLP2250 WeAreResidents.org) • Reduce transport emissions/allocate south of Beldams Lane, Bishop's Stortford (180 dwellings) due to bus and rail connections (PSLP191 Bloomhall) • Support overall approach i.e. co-ordinate development/transport – apply NPPF 32 Delete “accept rural nature of the district” 1.“congestion” replaces “impact” 6. Add with the potential to create significant impacts/delete “transport”(Grosvenor PSLP953) • At odds with Policy TA2 point 1 - offers appropriate routes for walking, cycling, horse riding and recreation (PSLP800 Essex Bridleways Association) • Lack of extra road and rail investment in infrastructure to cope with the increased demands placed upon it (PSLP1053 Ms Julie Williams) • Address reduction in transport emissions (PSLP141 Edward Gildea) • Tudor park has no footpaths/AQMA in Saffron Walden not resolved (PSLP2345 Saffron Walden Town Council) • No detailed transport assessment/no access north to M11 Junction 9/ travelling via busy A1301/A505/roundabout to J10 (PSLP1094 Mark Gamble) • Not clear how 60% modal shift can be achieved (PSLP1065 Simon Whitney)

	<ul style="list-style-type: none"> • Locate new development where it can be linked to services/facilities by a range of sustainable transport options (PSLP2680 Persimmon) • Travel plans a burden on older peoples housing (PSLP1985 McCarthy & Stone) • Garden Towns must have good access to major roads/shift in transport modes essential for sustainability (PSLP1584 Mr Anthony Armon-Jones)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Can no longer financially support unviable services so simply refer to provision of timetable information (Essex County Council PSLP914) • New developments to be connected by safe walking cycling routes to local facilities/require development to contribute to improving existing sustainable transport links/Travel Plans must have measurable outcomes (PSLP2250 WeAreResidents.org) • Policy text delete “accept rural nature of the district” 1. “congestion” replaces “impact” 6. Add “with the potential to create significant” impacts/delete “transport”(Grosvenor PSLP953)
Policy TA2 Provision of Electric Vehicle Charging Points	
SUPPORT	1
OBJECT	10
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Encourages sustainable transport to promote accessibility and integration into the wide community and existing network. Supportive of this approach and do not raise any objections under soundness or legal compliance (Chelmsford City Council PSLP1778)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Increase to 5% active plus 5% passive provision for all developments would be reasonable. For Flats increase to 5% for both active and passive provision of Electric Vehicles Charging Points (Essex County Council PSLP919) • Mention charging for on-street parking/public car parks PSLP662 Mrs Carey Dickinson) • Apply to non-residential uses (PSLP2896 Grant & Bloor) • Electric charging points not always be possible/practical (PSLP849 Sworders) • Targets for flats/provision need to be more ambitious/ need multi-charging bays in public places (PSLP2025 Sustainable Uttlesford) • Test via whole plan viability study (PSLP2809 Gladman) • All new developments should provide for Electric Vehicles Charging Points (PSLP2418 Littlebury Parish Council)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Increase to 5% active plus 5% passive provision for all developments would be reasonable. For Flats increase to 5% for both active and passive provision of Electric Vehicles Charging Points (Essex County Council PSLP919) • Mention charging for on-street parking/public car parks PSLP662 Mrs Carey Dickinson) • Apply to non-residential uses (PSLP2896 Grant & Bloor) • All new developments should provide for Electric Vehicles Charging Points (PSLP2418 Littlebury Parish Council)
Policy TA3 Vehicle Parking Standards	
SUPPORT	0
OBJECT	7
SUMMARY OF	None

REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Review Residential Parking Standards/increase provision (PSLP334 Elsenham Parish Council) • Distribution/design of new development/potential for servicing sites through sustainable transport solutions to reduce emissions/specific targets to reduce CO2 emissions need to be set (PSLP652 Mrs Carey Dickinson)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Review Residential Parking Standards/increase provision (PSLP334 Elsenham Parish Council) • Specific targets to reduce CO2 emissions need to be set (PSLP652 Mrs Carey Dickinson)
Policy TA4 New Transport Infrastructure or Measures	
SUPPORT	4
OBJECT	25
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Highways England have been heavily involved in the transport evidence base and support the enhancement to public transport and sustainable mode offer across the district and practically for the garden village developments. It will be essential for all development, and in particular for the garden villages, that housing comes forward along with all the key facilities as the demand arises (Highways England PSLP3025) • The transport evidence suggests that development in Uttlesford will not have severe impacts on the Suffolk highway network. Content with the assessment undertaken (Suffolk County Council PSLP2385) • Support point 3. Flitch Way Improvements - new walking/cycling connections south of Great Dunmow (Flitch Way Action Group PSLP628)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Measures should take account of impact on heritage assets, settings and archaeology (Historic England PSLP1862) • Strongly welcomes measures on Braintree branch line/minor correction – i.e. not yet in control period 6 (Braintree District Council PSLP2063) • Herts County Council must be involved early in the application process to inform S106s (Herts County Council PSLP2658) • Supports in principle/queries the effectiveness of reference to rapid transit measures to Stansted Airport/not in airport application (East Herts Council PSLP2502) • Any new path/off road route should be fully accessible to all user groups (PSLP404 British Horse Society) • Already pressure on Birchanger village road network (PSLP1643 Birchanger Parish Council) • Cycling measures in Saffron Walden need to be delivered/add to final paragraph “to avoid the centre and AQMA” (PSLP2255 WeAreResidents.org) • Saffron Walden needs another east to west route (PSLP2973 Ian Norman) • Extend NUGC measures to cam valley villages/Newport (PSLP2421 Littlebury Parish Council) • Heavy rail links needed (PSLP1747 Stortford Town Council) • Take more account of 10,000 dwellings at Easton Park (PSLP2602 Land Securities)

	<ul style="list-style-type: none"> • Stansted Airport railway station designed so an eastward extension could be made to the railway/dedicated busway unlikely to work • Potential changes from completion of Junction 7a/internalisation/modal shift at Garden Communities. Amend last sentence of Paragraph 9 “To cater for longer term growth in the region a further improvement to M11 Junction 8 may be required - a potential major long term major improvement is being developed by Essex/Hertfordshire County Councils/Highways England” (Land Securities PSLP2602) • Too aspirational/unclear how policy reached/enhancements required or envisaged/impact on airports transport facilities/no evidence to justify rapid transport corridor (Manchester Airport Group PSLP1521)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Measures should take account of impact on heritage assets, settings and archaeology (Historic England PSLP1862) • Strongly welcomes measures on Braintree branch line/minor correction – i.e. not yet in control period 6 (Braintree District Council PSLP2063) • Herts County Council must be involved early in the application process to inform S106s (Herts County Council PSLP2658) • Supports in principle/queries the effectiveness of reference to rapid transit measures to Stansted Airport/not in airport application (East Herts Council PSLP2502) • Any new path/off road route should be fully accessible to all user groups (PSLP404 British Horse Society) • Add to final paragraph “to avoid the centre and AQMA” (PSLP2255 WeAreResidents.org) • Amend last sentence of Paragraph 9 “To cater for longer term growth in the region a further improvement to M11 Junction 8 may be required - a potential major long term major improvement is being developed by Essex/Herts County Councils/Highways England” (Land Securities PSLP2602)

<i>Uttlesford District Council Regulation 19 Pre-submission Local Plan; Summary of Responses</i>	
Section / Paragraph / Policy	Summary of Responses
8. Infrastructure	
SUPPORT	0
OBJECT	22
SUMMARY OF REPRESENTATIONS IN SUPPORT	NA
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Paragraphs 8.1 - 8.5 discuss infrastructure funding, but fail to mention CIL • Align deliverability with the anticipated build/amend IDP to clarify if short or long term improvement works e.g. M11 J8 scheme should not apply long terms scheme to Easton Park (Land Securities PSLP2603) • Paragraph 8.15 - recreational horse riding must be included as a healthy active pastime (British Horse Society PSLP802) • Paragraph 8.16. Change to "indicates a rise in in levels of overweight or obesity" (Essex County Council PSLP923) • Paragraph 8.18. More up-to date data than 2006 from Public Health England and Royal Society of Public Health (Essex County Council PSLP924) • Paragraph 8.19. Additional text should be included to clarify why a Health Impact Assessment is required (Essex County Council PSLP926) • Paragraph 8.19 - Should be provided for ALL user groups (Essex Bridleways Association PSLP405) • Paragraph 8.21. Public Health be included as a body UDC liaises with (Essex County Council PSLP927) • Paragraph 8.23. Amend to reflect Health Impact Assessment guidance by Essex Planning Officers Association and Public Health/remove reference to Department of Health (Essex County Council PSLP928/929)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Paragraphs 8.1 - 8.5 mention CIL in infrastructure funding • Align deliverability with the anticipated build/amend IDP to clarify if short or long term improvement works /not apply long term schemes M11 J8 to Easton Park (Land Securities PSLP2603) • Paragraph 8.15 - recreational horse riding must be included as a healthy active pastime (British Horse Society PSLP802) • Paragraph 8.16. Change to "indicates a rise in levels of overweight or obesity" (Essex County Council PSLP923) • Paragraph 8.18. More up-to date data than 2006 from Public Health England and Royal Society of Public Health (Essex County Council PSLP924) • Paragraph 8.19. Additional text should be included to clarify why a Health Impact Assessment is required (Essex County Council PSLP926) • Paragraph 8.19 - Should be provided for ALL user groups (Essex Bridleways Association PSLP405) • Paragraph 8.21. Public Health be included as a body UDC liaises with (Essex County Council PSLP927) • Paragraph 8.23. Amend to reflect Health Impact Assessment guidance by Essex Planning Officers Association and Public Health/remove reference to Department of Health (Essex County Council PSLP928/929)
<u>Policy INF1 Infrastructure Delivery</u>	
SUPPORT	4
OBJECT	33
SUMMARY OF REPRESENTATIONS	<ul style="list-style-type: none"> • Maximum use made of existing infrastructure to allow strategic developments to proceed with minimum of delay/innovative approaches to

<p>IN SUPPORT</p>	<p>efficient use of services/behavioural change. Flexibility is provided on introducing a CIL for areas and/or development types where a viable charging schedule best mitigates impacts of growth. Garden Communities likely zero-rated for CIL purposes given heavy site-specific infrastructure requirements they bear (Grosvenor PSLP957)</p> <ul style="list-style-type: none"> • North Essex Plan Inspector notes interim solutions may be possible for transport infrastructure/proportion of traffic to enable early phases to proceed/could be applied to all infrastructure (Galliard Homes PSLP783) • Welcome the proposal to build four primary schools and one secondary school, as well as other civic amenities benefiting Great Chesterford/surrounding villages • Access to Saffron Walden County High School has become difficult for residents of Great Chesterford - new schools gives additional choice
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • The policy broadly accords with NPPF paragraphs 92, 96 and 97 2018/minor amendments required to policy/reasoned justification for clarity and consistency with Government policy (Sport England PSLP 66) • State development threshold on green infrastructure/new development cannot rely on Hatfield Forest to meet green infrastructure needs/new resources needed (Natural Trust PSLP2487) • Glossary needs definition of infrastructure (Essex County Council PSLP 921) • Infrastructure development must conserve and enhance the historic environment (Historic England PSLP1875) • Plans and policies should be revised to ensure that they are specific enough in their aims (West Essex Clinical Commissioning Group PSLP 2585) • Core Infrastructure must be delivered before development commences (Saffron Walden Town Council PSLP2351) • No Infrastructure Strategy for the area/lack of infrastructure identified to support the proposed growth/wish list/little justification or viability analysis, costing or timeframe (Residents for Uttlesford PSLP2589) • CIL instead of Section 106s would enable developer contributions to be used in truly strategic way/enable new developments to ease impact (Sustainable Uttlesford PSLP2038) • Requirement should be included in the policy and supporting text. • Places all risk with the community and little with the developer • Too many capacity constraints - sewerage, suds and electrical for sound WOBGC development • Public financial support doesn't mean master developer has to be a public-sector entity • Water Cycle Study suggests existing WRCs can only take initial residential growth in West Of Braintree/other growth would exceed headroom • Must include thresholds for planning obligations/contributions • Lack of infrastructure in Saffron Walden/schools/surgeries/traffic in centre/need a by-pass/little put in place by developers • Invest in current schools/former Friends private school • Not clear how applicant assesses if appropriate green infrastructure needed • Policies should be explicit on contributions to healthcare provision will be obtained/ developments sustainability on effective healthcare provision. • No firm plans for the provision of the required infrastructure • Better recognise role of public organisations in provision • Totality of costs borne by development must be adequately assessed

	<ul style="list-style-type: none"> • Omits thresholds/include obligations only if development exceed national thresholds, necessary to be acceptable, directly related in scale and kind (Sworders PSLP850) • Object to LtCan1, but concur with paragraph 8.1/INF1 (Andrew Martin PSLP2553) • Too generic, unclear what level of information/evidence needed to show how infrastructure could be used more efficiently/clarify will provide competitive returns to a willing land owner and willing developer (Boyer PSLP2565) • Pushes onus on developers to assess capacity/strategies to mitigate impacts. Should recognise the role of Council, Public Bodies and Statutory Undertakers in influencing, co-ordinating and delivering (Persimmon Homes PSLP2681)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Minor amendments required to policy/reasoned justification for clarity and consistency with Government policy (Sport England PLSP 66) • State development threshold on green infrastructure/new development cannot rely on Hatfield Forest to meet green infrastructure needs/new resources needed (Natural Trust PSLP2487) • Glossary needs definition of infrastructure (Essex County Council PSLP 921) • Infrastructure development must conserve and enhance the historic environment (Historic England PSLP1875) • Plans and policies should be revised to ensure that they are specific enough in their aims (West Essex Clinical Commissioning Group PSLP 2585) • Core Infrastructure must be delivered before development commences (Saffron Walden Town Council PSLP2351) • Public financial support doesn't mean master developer has to be a public-sector entity • Must include thresholds for planning obligations/contributions • Not clear how applicant assesses if appropriate green infrastructure needed • Policies should be explicit on contributions to healthcare provision will be obtained/ developments sustainability on effective healthcare provision. • Better recognise role of public organisations in provision • Totality of costs borne by development must be adequately assessed • Omits thresholds/include obligations only if development exceed national thresholds, necessary to be acceptable, directly related in scale and kind (Sworders PSLP850) • Clarify will provide competitive returns to a willing land owner/developer (Boyer PSLP2565)
<u>Policy INF2 Protection, Enhancement and Provision of Open Space, Sports Facilities and Playing Pitches.</u>	
SUPPORT	1
OBJECT	14
SUMMARY OF REPRESENTATIONS IN SUPPORT	NA
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • As the Sports Strategy should be completed/ at an advanced stage by examination it is considered acceptable for the local plan to be submitted in advance of the strategy being completed. The policy broadly accords with paragraphs 92, 96 and 97 of the NPPF (2018) and relevant 2012

	<p>policies/ minor amendments required to policy for consistency with Government policy (Sport England PSLP66)</p> <ul style="list-style-type: none"> • Policy based on an incomplete study/difficult to secure provision or financial contributions for indoor and outdoor sports facilities/include standards recommended in the Sports Strategy Need strategy on Green Infrastructure (National Trust PSLP2488) • No infrastructure/strategy identified to support the proposed growth in the district/IDP wish list/no justification, inadequate viability analysis, costing or timeframe for when the delivery is required/put all in plan (Residents for Uttlesford PSLP2589) • Need green corridors linking existing environmental assets/encouraging biodiversity in the district Sustainable Uttlesford PSLP2043 • Sharing facilities between schools and clubs often does not work in practice (Saffron Walden Town Council PSLP2358) • Stansted Mountfitchet has an unresolved shortage of open space (Stansted Mountfitchet Parish Council PSLP2623) • Sports Strategy should be available for evaluation now • Ensure new open spaces for sports facilities are provided to compliment and support the increase in housing to be built • Need separate policies for open space/playing pitch protection, and provision in new developments • Requirement for provision per person is not clear without an occupancy ratio for bedroom numbers/need extent of open space required • Contrary to the Open Space, Sport Facility/Playing Pitch needs set out in the IDP/increasing deficit in open spaces not addressed • Additional open space should be earmarked and pro-active funding should be sought for their development/allotments cannot be disposed of without Secretary of State permission • Objects to requirement for new developments providing on-site allotments • Newport and Stansted Mountfitchet faces a shortage of open space • Unnecessarily onerous requirement for on site provision for all schemes over 10 units that may not always be appropriate • Schools cannot cope with demand from their own students and local clubs • Weak on safeguarding existing recreational land and open space • Allotments/on-site play space, additional requirement may render schemes unviable/ limited evidence to justify the need for allotments (Boyer Planning PSLP2566) • Onerous requirement for on-site allotment e.g. 10 units in town centre/ flatted scheme/prevents the efficient use of land (Pegasus Planning Group PSLP2904)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • The policy broadly accords with paragraphs 92, 96 and 97 of the NPPF (2018) and relevant 2012 policies/ minor amendments required to policy for consistency with Government policy (Sport England PSLP66) • Include standards recommended in the Sports Strategy Need strategy on Green Infrastructure (National Trust PSLP2488) • Need green corridors linking existing environmental assets/encouraging biodiversity in the district Sustainable Uttlesford PSLP2043 • Ensure new open spaces for sports facilities are provided to compliment and support the increase in housing to be built • Add occupancy ratio for bedroom numbers/extent of open space required • Additional open space should be earmarked and pro-active funding should

	<p>be sought for their development</p> <ul style="list-style-type: none"> • Add - over 10 units threshold may not always be appropriate • Improve safeguarding existing recreational land and open space • Allotments/on-site play space, additional requirement may render schemes unviable/ limited evidence to justify the need for allotments (Boyer Planning PSLP2566)
Policy INF3 Health Impact Assessments	
SUPPORT	2
OBJECT	15
SUMMARY OF REPRESENTATIONS IN SUPPORT	NA
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Reference to EIA in bullet point 5 is unclear (West Essex Clinical Commissioning Group PSLP2585) • No assessment made of existing number of hot food takeaways in the District, the number already within 200 metres of a school/ likely to be restricted as a result of the policy/ businesses that would be rendered unviable by the restrictions (Kentucky Fried Chicken PSLP656) • Unnecessary requirement for all residential developments over 50 units to undertake a Health Impact Assessment/additional burden on housebuilders (House Builders Federation PSLP2529) • The PPG sets out that HIAs may be a useful tool where significant impact the but also importance of considering the wider health issues (Nathaniel Lichfield PSLP2886) • More specific guidance needed for robust HIAs to identify the responsibility and contribution of the Developer • HIA size threshold of 50 dwellings too high/ineffective on its own • HIA size threshold of 50 dwellings too low/unnecessary
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Clarify reference to EIA in bullet point 5 is (West Essex Clinical Commissioning Group PSLP2585) • Include assessment of existing number of hot food takeaways in the District, the number already within 200 metres of a school (Kentucky Fried Chicken PSLP656) • Avoid burden on housebuilders (House Builders Federation PSLP2529) • Consider the wider health issues (Nathaniel Lichfield PSLP2886) • More specific guidance for robust HIAs to identify the responsibility and contribution of the Developer
Policy INF4 High Quality Communications Infrastructure and Superfast Broadband	
SUPPORT	1
OBJECT	5
SUMMARY OF REPRESENTATIONS IN SUPPORT	NA
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Access from the nearest BT exchange is misleading as other independent fibre based networks are being deployed (Essex County Council PSLP930) • Not reasonable to request higher standards over and above the building regulations reflect Part R1/delete policy (House Builders Federation

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	PSLP2530)
MODIFICATION REQUEST	<ul style="list-style-type: none">• Access from the nearest BT exchange is misleading as other independent fibre based networks are being deployed (Essex County Council PSLP930)

Uttlesford District Council Regulation 19 Pre-submission Local Plan; Summary of Responses	
Section / Paragraph / Policy	Summary of Responses
9. Design and Construction	
SUPPORT	1
OBJECT	5
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Paragraphs 9.5-9.7 supported as they reflect requirement to reflect local distinctiveness (Historic England PSLP 1878)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Paragraphs 9.10-9.16:- The 100 unit threshold requirement for a Masterplan is too high in the context of a small market town such as Saffron Walden where all development has an impact. The threshold should be 5 units or more to “safeguard Uttlesford’s distinctive character and environment”. (Saffron Walden and Little Walden Neighbourhood Plan PSLP 2960) Uttlesford District Council is not good at securing beneficial S106 agreements and this has resulted in development with a few exceptions that has little to do with the vernacular architecture (Wendens Ambo Parish Council PSLP 2431) Paragraphs 9.10-9.16:- The 100 unit threshold is too high in the context of Saffron Walden; and Paragraph 9.14:- The plan does not state how phasing might be carried out in practice. (Saffron Walden Town Council PSLP 2362) Policies D1, D2, D6, D8 should all need to recognise Neighbourhood Plans. (WeAreResidents.org PSLP 2260) Paragraph 9.7 include reference in this paragraph to the fact that Policy D8 and D9 applies to new build developments and that there are certain exemptions for listed buildings, buildings in conservation areas and scheduled monument. (Historic England PSLP 1877)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Paragraphs 9.10-9.16:-A masterplan should be required for all developments of 5 units or more; and Paragraph 9.14:- All phasing should be carried out so as to benefit the first residents. (Saffron Walden Town Council PSLP 2362) The text for each of the policies (D1, D2, D6, D8) should be amended to read, “All aspects of these policies should apply unless specified in respective Neighbourhood Plans.” Plan (WeAreResidents.org PSLP 2260) Include reference in this paragraph to the fact that Policy D8 and D9 applies to new build developments and that there are certain exemptions for listed buildings, buildings in conservation areas and scheduled monument (Historic England PSLP 1877)
Policy D1 High Quality Design	
SUPPORT	4
OBJECT	11
SUMMARY OF REPRESENTATIONS IN	<ul style="list-style-type: none"> Galliard supports the Council's emphasis on the importance of high quality design. The development of garden communities

<p>SUPPORT</p>	<p>provides a unique opportunity to achieve well-designed places, where you don't have the constraints of existing development where an urban extension is planned. The Garden Community approach is also entirely consistent with section 8 of the NPPF in promoting healthy and safe communities. These two strategic objectives go hand-in-hand and are mutually complementary. (Galliard Homes PSLP 784)</p> <ul style="list-style-type: none"> • The reference in the policy to development resulting in healthy places which prioritise active travel and provide opportunities for, and access to, facilities for sport and physical activity is welcomed. This would be consistent with the Council's corporate plan and the Uttlesford Health and Wellbeing Strategy. (Sport England PSLP 68). • Policy welcomed and the change to include the term historic environment.(Historic England PSLP 1879) • The first paragraph refers to the development being informed by the Essex Design Guide and Building for Life 12. It would also be beneficial to include a desire to make reference to relevant conservation area appraisals, where appropriate, particularly in helping to better define the 'local distinctiveness' referenced by the Essex Design Guide.(Essex County Council PSLP 931)
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • Uttlesford District Council has a poor record on securing beneficial S106 agreements and developers have managed to either water down or justify removal of obligations (Wendens Ambo Parish Council PSLP 2432). • Policy D1 does not meet green infrastructure and climate change when it is essential that these are embedded within all stages of planning. (Essex County Council PSLP 933) • Reference should be made to relevant conservation appraisals where appropriate to help better define the "local distinctiveness" referenced by the Essex Design Guide (Essex County Council PSLP 931) • Policy D1 is unclear, imprecise, wordy and repetitive making it difficult to interpret. This policy is overly wordy and repetitive, making it difficult to interpret. The first sentence states that it applies to "all new development", however, the detail contained in the rest of the policy precludes it from being applicable to all development. (Sworders PSLP 853). • Application of Essex Design Guide to planned new settlements will be inappropriate as the developments should reflect the age in which they are being planned and developed thus providing greater scope to incorporate energy generation and management discretely (Littlebury Parish Council PSLP 2423). • Policy is overly onerous as it requires new development proposals to enhance the amenity value of an area (Taylor Wimpey Strategic Land PSLP 2887) • No evidence in Draft Plan or evidence to support information on the size and type of dwelling being built in the area nor an assessment of the impacts of adopting the space standards. • In order to impose internal space standards local planning

	<p>authorities have to take into account:</p> <ul style="list-style-type: none"> – Need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes. – Viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted; – Timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions; and <ul style="list-style-type: none"> • Neither the draft Local Plan, nor any of the evidence papers supporting the Plan provides information on the size and type of dwellings being built in the area. (Persimmon Homes Essex PSLP 2684) • Policy D1 High Quality Design: the third paragraph mentions the need for development to ‘...provide for a rich movement network and choice of routes’. We would prefer to see this Policy clarified so that there is no confusion over the need to provide access for all users (British Horse Society PSLP 803 & Essex Bridleways Association PSLP 406) • There should be a provision whereby applications will not be considered from developers who have been found to be inadequate in the past; • It is stated that ‘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.’ Setting aside the question of what a well-designed space might look like, these are no doubt fine words; but how do you propose to achieve these laudable objectives? • Sections 9.15 and 9.16 state that design codes will be required. They should be available now. In practice, developers seek to build a collection of their standard designs. Specific guidelines are needed, e.g.: <ul style="list-style-type: none"> • No false chimneys; • No false bricked-up windows; • Façades to be varied, even where the basic design is the same; • Variations in basic design in order to give variety to roof outlines; • No terraces; • No more than four houses in a straight line; • Storey heights to be restricted to 2.5 in rural areas, where the top storey is genuinely and completely in the roof space, and not used as a device to build three-storey blocks of flats; • Minimum pavement widths such that a double buggy could be
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	<p>wheeled along comfortably.</p> <ul style="list-style-type: none"> • Several of these suggestions are drawn from examples of poor design to be found on new estates within a very short distance as I write this. • There is also a need to have regard for increasingly sustained high temperatures in summer by making adequate provision for air conditioning (PSLP 384). • Objection to the requirement to ‘enhance’ the amenity value of an area is overly restrictive, especially in light of the fact that new development will naturally result in some change in the environment.; and • The policy requires adherence to national space standards. Paragraph 001 Reference ID: 56-001- 20150327 of the NPPG makes it clear that LPAs will need to gather evidence to determine whether there is a need for additional standards in their area and justify setting appropriate policies in their Local Plans. Paragraph 002 Reference ID 56-002-20160519 of the NPPG confirms that LPAs should consider the impact of using these standards as part of their Local Plan viability assessment. There appears to be no evidence to justify the requirement for compliance with the national space standards and in these circumstances. (Bovis Homes Ltd. PSLP 2569) • We agree with the comments made by Saffron Walden Town Council in relation to the Reg 18 consultation, which are still applicable to the Reg 19 draft. Additionally policies D1, D2, D6, D8 should all need to recognise Neighbourhood Plans. (WeAreResidents.org PSLP 2262)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Change Policy D 1 to include following wording: <ul style="list-style-type: none"> – “Development will be expected through appropriate design and delivery to maintain, protect and enhance existing green infrastructure and contribute towards the provision of additional high quality multi-functional green infrastructure connecting to the wider network.” – “Development should consider future climate risks to ensure risks are understood over the development’s lifetime and implement appropriate adaptation and mitigation approaches in the design, delivery and maintenance.” (Essex County Council PSLP 933) • Change Policy D 1 so that it refers to relevant conservation area appraisals where appropriate to better define the “local distinctiveness referenced by Essex Design Guide. (Essex County Council PSLP 931) • The policy needs to be clearer which elements relate to all development and which only specific types of developments. <ul style="list-style-type: none"> – Suggest bullet points or numbered points for clarity. – Delete reference to “the necessary dwelling mix” (Sworders PSLP853) • Policy to be reworded to read: “Proposals for new development should demonstrate how they respond to and preserve the amenity value of an area through consideration of matters such as overlooking, natural light, microclimate,

	<p>outlook and amenity space. Equally, proposals for new development should meet the nationally described space standards (49) and the necessary dwelling mix, privacy, daylight and sunlight for future occupiers.” (Taylor Wimpey Strategic Land PSLP 2887)</p> <ul style="list-style-type: none"> • Reference to space standards in Policy D1 should be deleted as there is insufficient evidence to warrant their inclusion or assessment of the impact on delivery.(Persimmon Homes Essex PSLP 2684) • The last sentence in paragraph 3 the Policy should be reworded thus: ‘...provide for a rich movement network and choice of routes accessible to all users’(British Horse Society PSLP 803 & Essex Bridleways Association PSLP 406) • Do not accept applications from developers with a poor record. Make design codes available now, and ban some of the worst architectural horrors. Make adequate provision for air conditioning (Graham Mott PSLP 384). • Implementation of the policy can be supported by a minor modification should be made to the reasoned justification to refer to Sport England's and Public Health England’s ‘Active Design’ guidance (Sport England PSLP 68). • Object to this policy requirement to comply with the national space standards where there is no evidence to justify this requirement. (Bovis Homes Ltd. PSLP 2569) • The text of each policy should be amended to read “All aspects of these policies should apply unless specified in respective Neighbourhood Plans.”(WeAreResidents.org PSLP 2262)
Policy D2 Car Parking Design	
SUPPORT	0
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • This Policy is unduly prescriptive and does not have regard to local context. Developments within the District have included a range of parking typologies, including frontage parking; • The Policy requires the incorporation of street trees. Whilst street trees have a place, they are not always practical (in terms of the significant space required which can be upwards of 6m verge) or desirable from both an urban design perspective or because the highway authority will not adopt the road (Persimmon Homes Essex PSLP 2685). • The Policy D2 - Car Parking Design makes only a very generic statement, is uninformative and makes no reference whatsoever to any design standards to which it could or should be tied. The Essex Design Guide 2018 published by Essex County Council has a section allocated to parking design, which should be specifically linked to Policy D2.(PSLP 701) • A provision is needed whereby garages must be of sufficient size to accommodate all modern vehicles designed to seat up

	<p>to five persons. (Elsenham Parish Council PSLP 289)</p> <ul style="list-style-type: none"> We agree with the comments made by Saffron Walden Town Council in relation to the Reg 18 consultation, which are still applicable to the Reg 19 draft. Additionally policies D1, D2, D6, D8 should all need to recognise Neighbourhood Plans. (WeAreResidents.org PSLP 2263)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Parking should not dominate the public realm, with garages (where proposed) set back from the building line (Persimmon Homes Essex PSLP 2685). Policy D2 should clearly state that the Essex Design Guide 2018 - Car Parking Design guidelines should be followed for all new developments. Should there be any shortfall or omission within the design guide, then UDC should add its own supplementary standards (as was undertaken by the UDC parking standards) (PSLP 701) Amend the policy to ensure that garages must be of sufficient size to accommodate all modern vehicles designed to seat up to five persons. Where possible increase capacity by making the space slightly deeper and including road markings to show that parking at a chevron angle should be adopted. (Elsenham Parish Council PSLP 289) The text of each policy should be amended to read "All aspects of these policies should apply unless specified in respective Neighbourhood Plans." (WeAreResidents.org PSLP 2263)
<u>Policy D3 Small Scale Development / Householder Extensions</u>	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Objection to this policy on the basis that it is unclear and imprecise. "Small scale development" is not defined anywhere in the Plan so it is not clear what this element of the policy applies to. Neither is it clear what "appropriate space standards" are and how these differ from the "nationally described space standards" referred to in policy D1. We consider it more appropriate that this policy should only apply to Householder Extensions. Other developments are covered by policy D1. (Sworders PSLP 854)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Rename the policy "Householder Extensions"; Delete references in the title and text to "small scale development"; and Clarify which space standards are applicable. (Sworders PSLP 854)
<u>Policy D4 Development Frameworks and Codes.</u>	
SUPPORT	2
OBJECT	13
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Council's decision to underpin its spatial development strategy with the creation of new garden communities is fully

	<p>supported. It is not clear from the wording of 'Development Frameworks and Codes' exactly who the Council anticipates will be responsible for the preparation of development frameworks. We are uncertain how the process described fits in with the work by the Councils that has commenced e.g. on a DPD for West of Braintree. (Galliard Homes PSLP 782)</p> <ul style="list-style-type: none"> • Andrewsfield New Settlement Consortium (ANSC) supports Policy D4 (Development Frameworks and Codes) as a sound approach to planning that will positively prepare for comprehensive development of the West of Braintree Garden Community (WBGC) across district boundaries, and including land at Boxted Wood controlled by Galliard Homes; and . • ANSC also recognises the benefits of a Design Code being approved for the WBGC ahead of any reserved matters or detailed application being determined, although it is submitted that this is not absolutely necessary dependent on a high quality detailed scheme being brought forward. (Andrewsfield New Settlement Consortium PSLP 1987) • We support the principle of Policy D4 which requires development frameworks to be prepared for the garden communities. The preparation of the development framework for NUGC as a DPD will provide UDC and the local community with sufficient clarity and certainty on NUGC's emerging development proposals (Grosvenor Great Britain and Ireland PSLP 963). • We broadly welcome this policy but suggest the addition of the words 'and responding to the historic environment' at the end of bullet point 3. (Historic England PSLP 1880)
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • The plan is weak in a number of policy areas; (b) the need for green infrastructure that mitigates or adapts to future climate change particularly the need for Sustainable Urban Drainage schemes associated with the proposed new Garden Settlements (Uttlesford Liberal Democrats Local Party PSLP 2981). • The requirements for Development Framework documents and Design Codes to be prepared, effectively add an additional 'layer' to the planning process. This results in additional time, cost, and expenditure of resources for both applicants and the Council. Delays may arise which could impact upon the timely delivery of new homes and in turn, the Council's housing trajectory. This could result in the Plan being rendered not effective; • Whilst the policy refers to 'strategic' development sites the term 'strategic' is not defined and it is conceivable that the requirements for Development Frameworks and Design Codes could be applied inappropriately to small-to-medium size allocations for which the process is unlikely to achieve any meaningful benefit. Similar outcomes could be achieved by a properly drafted Design and Access statement which will cover much of what is included in a Development Framework or Design Code in any event. It is therefore considered that the policy as drafted does not represent the most appropriate or

	<p>expedient way of securing good design for small-to-medium sites and is therefore not justified; and</p> <ul style="list-style-type: none"> • There are outstanding issues with neighbouring authorities regarding elements of the Plan that must be addressed in order for the Council to confirm that it complies with the duty to co-operate (<i>Martin Grant Homes & Bloor Homes PSLP 2909</i>) • Bullet 5 in the second paragraph should actually mention 'sustainable drainage systems' somewhere within it still, as when people think 'flood mitigation areas' they most likely are not thinking about SUDS. (<i>Environment Agency PSLP 609</i>) • Terminology is not consistent as Policy D4 and other policies refer to Development Frameworks which has been replaced by a DPD requirement as set out in SP5; • Policy D4 requires a single Design Code for each of the strategic sites to be approved prior to the submission of reserved matters but this is not appropriate in large developments which are likely to be developed over 20 plus years ; and • The requirement for applications relating to the new Garden Communities to undertake a Building for Life 12 Assessment (or a later equivalent). We would anticipate that most of the topics covered in the assessment would be the subject of condition or s.106 requirements on any outline planning permission relating to the new Garden Communities, as they relate to detailed design matters. (<i>Land Securities Policy 2606</i>) • There is a need for a GI policy that applies generally to development to be included within the document; and • A strategic approach to GI should be detailed in a specific policy or evident in related policies. In our view a strategic approach to GI has not been included anywhere in the Plan. This is a particular concern given the scale of development proposed and the key role of extensive areas of high quality GI in meeting people's demands for recreation.. (<i>Natural England PSLP 2466</i>) • The requirement for approval of a development framework prior to submission of a planning application for sites of 100 units is completely unjustified and will slow down delivery. It is also unclear as to who will approve the development framework, will it be officers or members and what recourse would there be if a framework was rejected. The policy seeks to introduce an additional requirement into the planning applications process for sites of more than 100 units which is unjustified and ineffective. (<i>Home Builders Federation PSLP 2534</i>) • Although the policy is supported in principle, there is a concern that this policy is overly onerous on the developer and landowner and has the ability to delay the sites being brought forward for development if these frameworks cannot be agreed with the Council or there are insufficient resources for these to be considered and adopted. This is, therefore, unsound as it ineffective (<i>Taylor Wimpey Strategic Land PSLP</i>)
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	<p>2888)</p> <ul style="list-style-type: none"> • Policy D4 is not considered reasonable for all strategic development sites to produce a Development Framework for approval by the Council prior to submission. Strategic development sites are defined in the supporting text as ‘those in excess of 100 units’. Whilst a Development Framework may be appropriate for the new garden communities, they are not considered appropriate for sites less than 500 units; and • The requirement to establish density, mix and type of development, green infrastructure plans and phasing plans are also not considered appropriate for an outline planning application, the purpose of which is to establish if the principle of development is acceptable. The criteria set out in Policy D4 would normally be determined at the reserved matters stage. (Countryside Properties UK Limited PSLP 2769) • There is no justification as to why this number of dwellings (over 100) would require a development framework and/or design code. The provision of a development framework/design code for developments of this scale is considered unnecessary and an overly onerous requirement, given that such schemes would be delivered in one phase and would normally have one landowner. Development control policies would be sufficient to ensure that the proposal provides high quality design.(Bovis Homes 2570) • If it is the Council's intention that this policy relates to all potential development of a strategic scale then the definition of strategic scale should be included in the policy (Gladman PSLP 2810) • In the supporting text for this policy, paragraph 9.11, as well as within the policy itself, refers to the need for adopted masterplans for the sites to be submitted. It should be made clear for the West of Braintree Garden Community that this would be a Development Plan Document rather than a Supplementary Planning Document and it will be a joint document, covering the site in a comprehensive way (Braintree District Council PSLP 2065)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Bullet 5 in the second paragraph should actually mention 'sustainable drainage systems' somewhere within it still, as when people think 'flood mitigation areas' they most likely are not thinking about SUDS.(Environment Agency PSLP 609) • Policy D4 and other policies refer to Development Frameworks, which we understand are now replaced by the DPD requirement set out in Policy SP5. For the avoidance of doubt these references should be replaced, so that the terminology used throughout the plan is consistent; • Area Design Codes would be more relevant for a 10,000 unit New Garden Community at Easton Park which is likely to be built over 20 years plus; • The policy should be amended to require the approval of the relevant Design Code/Area Design Code, prior to approval of any reserved matters application; and • Clarify in Policy D4 whether the expectation is for outline or

	<p>reserved matters submissions to be accompanied by the Building for Life Assessment. (Land Securities Policy 2606)</p> <ul style="list-style-type: none"> • Uttlesford Local Plan should include a green infrastructure policy or preparation of Green Infrastructure Strategy for cross-reference within relevant policies. Policy EN8 Open Spaces could be easily amended to include reference to wider green infrastructure issues and requirements to protect and enhance the district’s GI network. (Natural England PSLP 2466) • The policy should be deleted. (Home Builders Federation PSLP 2534) • This policy to be effective and positively prepared, it should be amended to remove the requirement for the frameworks to be submitted to the Council for approval prior to the submission of any planning application. Instead the policy should allow for the submission of masterplan documents with any outline planning application for Strategic Development Sites. (Taylor Wimpey Strategic Land PSLP 2888) • This policy should be deleted from the Plan. (Countryside Properties UK Limited PSLP 2769) • It is suggested that planning applications can be prepared in parallel with the development framework. If everything is prepared in sequence this will add unnecessary delay to the delivery of development, which is not in the Council's interest, especially in the early years of the Plan. (Galliard Homes PSLP 782) • It is recommended that the requirement for a development framework/design codes on “strategic sites (over 100 dwellings)” is deleted but retained for the garden communities (where development would be phased, with multiple owners). (Bovis Homes 2570) • The requirement for Development Frameworks to be agreed by the Council prior to any application being made should be deleted. Requiring Council approval is considered to be too onerous as it may prevent non-allocated sustainable sites from coming forward simply because the Council will not agree to the content of the Framework (Gladman PSLP 2810) • The following amendments are required to the policy wording in order to ensure the deliverability of the garden community within the timeframes anticipated “Development Plan Documents (DPDs) frameworks shall be prepared for the garden communities and all strategic development sites for approval by the Council prior to submission of a Any planning application will need to accord with the development principles set out in the DPD and this policy. In the case of the new garden communities the development frameworks will be prepared as development plan or supplementary planning documents and adopted by the local planning authority. Where sites subject to a development framework crosses multiple land ownerships, the different landowners should work together to prepare a joint development framework that demonstrates how comprehensive development will be
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	<p>delivered” (Grosvenor Great Britain and Ireland PSLP 963).</p> <ul style="list-style-type: none"> • It should be made clear for the West of Braintree Garden Community that this would be a Development Plan Document rather than a Supplementary Planning Document and it will be a joint document, covering the site in a comprehensive way (Braintree District Council PSLP 2065) • We broadly welcome this policy but suggest the addition of the words 'and responding to the historic environment' at the end of bullet point 3. (Historic England PSLP 1880) • The wording should be revised to exclude small-to-medium sized developments either by identifying individual sites (for example the Garden Communities and the larger urban extensions) or by setting a threshold for beyond which Development Frameworks or Design Codes will be required (for example, 1,000 units)..(Martin Grant Homes & Bloor Homes PSLP 2909)
Policy D5 Shopfronts	
SUPPORT	1
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	We very much welcome the inclusion of a policy supporting the retention and enhancement of historic shopfronts. (Historic England PSLP 1882)
SUMMARY OF REPRESENTATIONS IN OBJECTION	Policy D5 should include review by the relevant town/parish council where they have a Neighbourhood Plan. (WeAreResidents.org PSLP 2266)
MODIFICATION REQUEST	D5 should include review by the relevant town/parish council where they have a Neighbourhood Plan (WeAreResidents.org PSLP 2260)
Policy D6 Design Review	
SUPPORT	0
OBJECT	5
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Objection to the blanket requirement for all large schemes to be subject to a design review, which is considered not effective. This should be a matter for the applicant to agree to and should not be an obligation imposed on all such schemes; and • This policy does not define what a “strategic” or “major” development site is, meaning the policy could affect small-to-medium scale sites for which a design review process will present a significant burden in terms of time and resourcing. The requirement to undertake design review will also require significant resourcing from the Local Planning Authority at a time when budgets and staffing are already stretched. (Martin Grant Homes & Bloor Homes PSLP 2908) • Policy D6 sets out the proposed requirement for design review for emerging schemes. This policy should be clarified to confirm that by “emerging schemes” it refers to emerging reserved matters submissions; and • Additionally, Policy D6 should make clear that the Design

	<p>Review will need to have regard to the Design Code/Area Design Code approved in accordance with Policy D4.(Land Securities PSLP 2607)</p> <ul style="list-style-type: none"> • This policy seems to apply only to Garden Communities and other sites at the discretion of the Council (Saffron Walden Town Council PSLP 2364). • It is considered that all projects should be subject to design review, without the need to make a subjective judgment as to whether smaller sites are 'in important and/or sensitive locations' (Elsenham Parish Council PSLP 277) • Object to Policy D6 which requires all new Garden Communities, other strategic development sites and smaller sites in important or sensitive locations to be assessed through design review. This is considered to be too onerous and restrictive (Gladman PSLP 2811)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • It is considered that this is unnecessary and should be removed from the Plan; • To overcome this objection, it is requested that the policy be amended to encouraging design review rather than requiring it. (Martin Grant Homes & Bloor Homes PSLP 2908) • The text of each policy should be amended to read "All aspects of these policies should apply unless specified in respective Neighbourhood Plans."(WeAreResidents.org PSLP 2262) • This policy should be clarified to confirm that by "emerging schemes" it refers to emerging reserved matters submissions; and • Policy D6 should make clear that the Design Review will need to have regard to the Design Code/Area Design Code approved in accordance with Policy D4..(Land Securities PSLP 2607) • In order to deliver objective 3a (page 14) to "safeguard Uttlesford's distinctive character and environment", this policy should apply to all developments; and • The design review should consider the Heritage and Character Assessments of neighbourhoods, where such assessments exist. (Saffron Walden Town Council PSLP 2364). • Amend the second sentence to read, 'Equally, smaller sites will also be subject to design review' (Elsenham Parish Council PSLP 277) • The Policy should be reworded to state that the Council will encourage rather than require emerging schemes to be assessed through a design review.(Gladman PSLP 2811)
Policy D7 Innovation and Variety	
SUPPORT	0
OBJECT	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Concern remains that the outcome will be poor. Uttlesford District Council does not have a good record of obtaining beneficial S106 agreements and there have been very few benefits coming from developers who have been able to water

	<p>down or ‘justify’ the removal of requirements; and</p> <ul style="list-style-type: none"> • With some notable exceptions, the type of construction which has been built in towns such as Saffron Walden, has little to do with the vernacular architecture and remains firmly wedded to generic ‘boxes’. It is therefore difficult to see how Policy D7 (Innovation and Variety) will actually be implemented. (Wendens Ambo Parish Council PSLP 2433) • There should be a specific ban on ‘off-the-shelf’ housing types. In Elsenham there have often been fine words about respecting the local vernacular, and the like; in practice, developers have then offered a mix of their standard designs (Elsenham Parish Council PSLP 278). • This policy is considered unnecessary and should be incorporated into Policy D1 relating to High Quality Design. (Bovis Homes Ltd. PSLP 2571)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Include a specific ban on ‘off-the-shelf’ housing types. (Elsenham Parish Council PSLP 278). • The term “off the shelf” is considered inappropriate and this policy should be removed. (Bovis Homes Ltd. PSLP 2571)
<u>Policy D8 Sustainable Design and Construction</u>	
SUPPORT	0
OBJECT	9
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • This policy deals with sustainable design and construction but fails to mention solar panels (Saffron Walden and Little Walden Neighbourhood Plan PSLP 2961). • Surface water drainage needs to be designed and delivered in accordance with the guidance produced by ECC in its role as Lead Local Flood Authority. This should be stated in Policy D 8 (Essex County Council PSLP 935) • This policy on the basis that it is unclear, imprecise and unnecessary. Sustainable design and construction are adequately dealt with through point 1 of policy SP12 and other regulations; and • The policy also conflicts with policy D9; policy D8 requires development to be in accordance with relevant Building Regulations whereas policy D9 requires emissions to be 19% lower than those required by Building Regulations. As a consequence, it is not clear what the relevant standards are so does not give a clear indication of how a decision maker should react to a development proposal. (Sworders PSLP 855) • The second paragraph requires development to demonstrate as part of any application how it is consistent with appropriate Building Regulations. Such an approach is not appropriate and could lead to significant confusion as to the grounds on which an application should be refused. It must be assumed when considering an application that it will be built to the required regulation and it will be for that system to determine whether or not these have been met (Home Builders Federation PSLP

	<p>2535 & PSLP 2265)</p> <ul style="list-style-type: none"> • This policy deals with sustainable design and construction but fails to mention solar panels.(Saffron Walden Town Council PSLP 2365 & PSLP) • There should be no requirement for applicants to demonstrate how they will meet Building Regulations or provide an Energy Assessment detailing the energy demands and carbon dioxide emissions as required by Part L of the Building Regulations. These regulations are legal standards to which all developers must accord and as such it is inappropriate and unnecessary to require any evidence on these matters when applying for planning permission. Such an approach is not appropriate and could lead to significant confusion as to the grounds on which an application should be refused.(Persimmon Homes Essex PSLP 2686) • This plan falls short of the government’s national standards for a building’s sustainability and for zero carbon buildings; • There is no reference in this plan to Zero Carbon, nor any sense that the plan espouses such a target. Without clearly stated, targeted commitments, there is no way of stopping development; and • No evidence that the council has consulted with partners, research or exponents of good practice in sustainable, zero carbon building and development.(PSLP 666) • No reference in this plan to Zero Carbon, nor any sense that the plan espouses such a target or shows the level commitment or leadership in reaching it. Instead it seems to be riddled with 'get out clauses' that will enable developers to pay scant regard to the government's policy.(PSLP 146)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • The text of each policy should be amended to read “All aspects of these policies should apply unless specified in respective Neighbourhood Plans.”(WeAreResidents.org PSLP 2262) • Change Policy D 8 to include an additional sentence to read: “Waste, recycling and storage areas should be provided. Equally, systems that reduce water consumption and allow for the reuse of grey water is encouraged. Development will not increase flood risk on or off the site. Developer to design and deliver the surface water drainage in accordance with Lead Local Flood Authority guidance.” (Essex County Council PSLP 935) • Delete this policy (Sworders PSLP 855). • The second paragraph of D8 should be deleted. (Home Builders Federation PSLP 2535) • The second paragraph of D8 should be deleted. .(Persimmon Homes Essex PSLP 2686) • Close adherence to national minimum standards(PSLP 666)
<u>Policy D9 Minimising Carbon Dioxide Emissions</u>	
SUPPORT	0
OBJECT	7
SUMMARY OF	

<p>REPRESENTATIONS IN SUPPORT</p>	
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • The plan unsound because (1) it is weak in a number of policy areas: We consider the encouragement of use of renewable and other technologies which help reduce our carbon footprint, especially in the construction of new Garden Villages. (Uttlesford Liberal Democrats Local Party PSLP 2982) • Concerned that policy D9 sets requirements beyond the scope of national technical standards for energy efficiency. In 2015 the Government made it clear that these matters should be addressed only through Building Regulations rather than through planning policy . Policy D9 as drafted directly conflicts with this requirement, meaning the policy will effectively encroach upon what should be dealt with under a different consenting regime. Policy D9 is not consistent with national policy and guidance (Martin Grant Homes & Bloor Homes PSLP 2907) • The last line states "These requirements will apply unless it can be demonstrated that they would make the development unviable". This statement is an invitation to developers to do as little as they can get away with. (PSLP 2542) • Government’s intention is to deliver the vast majority of improvements in technical building standards through Building Regulations. As such there should be no requirement for applicants to provide an Energy Assessment detailing the energy demands and carbon dioxide emissions as required by Part L of the Building Regulations. These regulations are legal standards to which all developers must accord and as such it is inappropriate and unnecessary to require any evidence on these matters when applying for planning permission. • The Government have set out the optional technical standards that can be adopted in local plans. These do not include measures to improve energy efficiency above Building Regulations. (Persimmon Homes Essex PSLP 2687) • Encouraging developers to include renewable energy as part of a scheme and minimising resource use in general should not be taken forward into the Local Plan as a mandatory energy efficiency requirement. This would be contrary to the Government’s intentions, as set out in ministerial statement of March 2015, the Treasury’s 2015 report ‘Fixing the Foundations’⁶ and the Housing Standards Review, which specifically identified energy requirements for new housing development to be a matter solely for Building Regulations with no optional standards; and • The Government have set out the optional technical standards that can be adopted in local plans. These do not include measures to improve energy efficiency above Building Regulations. (Home Builders Federation PSLP 2536) • This policy sets out that development proposals should achieve a Dwelling Emission Rate that is 19% lower than the Target Emission Rate required by Building Regulations Part L 2013 Edition. In accordance with Government guidance,

	<p>energy regulations should be dealt with by Building Regulations with no optional standards. Therefore this policy is contrary to National Planning Policy and is unsound. (Bovis Homes Ltd PSLP 2572)</p> <ul style="list-style-type: none"> • Are the required Insulation measures sufficiently robust? Many developers attempt to downgrade this provision. UDC was happy to showcase a Passive Haus. Why cannot this be the presumption in all new development in the District? Heat recovery should be standard, where possible. (Birchanger Parish Council PSLP 2520)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Policy D9 should be deleted. (Martin Grant Homes & Bloor Homes PSLP 2907) • The last sentence in the Policy should be removed from the document. (PSLP 2542) • We recommend that this policy makes reference to the fact that energy regulations are dealt with by Building Regulations (Bovis Homes Ltd PSLP 2572) • Policy D9 should be deleted. (Persimmon Homes Essex PSLP 2687) • Policy D9 should be deleted. (Home Builders Federation PSLP 2536)
<u>Policy D10 Highly Energy Efficient Buildings</u>	
SUPPORT	1
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • We support the goal of building highly energy efficient low carbon homes in the Garden Settlements. (Uttlesford Liberal Democrats Local Party PSLP 2983)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Meeting climate change targets through new-build housing is made difficult because the developers are only bound by Building Regulations which have not been updated since 2013. The creation of zero-carbon or low-carbon housing in the Garden Settlements should be the aim of developers by including such measures as passiv-haus or pv panels. The use of renewable and other technologies to reduce carbon footprints should be a key goal of the Local Plan. (Uttlesford Liberal Democrats Local Party PSLP 2024) • Such new housing as is essential should not add to current problems of air pollution, flooding, congestion and social inequality. It should comply with passive house standards of sustainability. It should be financed by serious tax reforms and accompanied by sufficient steps to put right the mistakes of the past. These include neglect of waterways, building on flood plains, concreting over hill slopes, reduction of public transport, inadequate provision for climate change, dependency on imports and failure to provide infrastructure. (PSLP 1927)
MODIFICATION REQUEST	

Uttlesford District Council Regulation 19 Pre-submission Local Plan; Summary of Responses	
Section / Paragraph / Policy	Summary of Responses
10. Environment	
SUPPORT	0
OBJECT	6
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • There are three Sites of Special Scientific Interest around the proposed area where Easton Park Housing Estate would be built and there has already been a complete disregard in recent years as to the worth of these areas despite being the three largest, in terms of land area, in the District of Uttlesford. If the development of Easton Park is approved, the High Wood Site of Special Scientific Interest will be almost entirely surrounded by housing preventing migration, re-population of the local area and mixing of the gene pool of individual animal and plant species. (PSLP760) • Pressure from potential expansion of villages within adjacent character areas which would infringe on the open character of the area; The visual intrusion of potential road expansion linked to the pressure of traffic on minor roads; The erection of new buildings, which would be conspicuous on the skyline; Potential pressure for increased use of narrow and minor roads; Potential pressure from urban expansions on the edges of Great Chesterford and Saffron Walden.(PSLP1792) • Heritage sites; Assessment referred to in the Local Plan, states that alternative sites should be considered in order not to compromise the heritage assets within this highly sensitive site (Roman Temple @ Great Chesterford) It is without question that this landscape would suffer irreversible harm in terms of Heritage Assets should this development be approved. (PSLP1792) • PARAGRAPH 10.57 Saffron Walden has an AQMA that contains some road junctions where there is a risk that levels of nitrogen dioxide do not meet the national air quality objective. The AQMA is in place because levels of nitrogen dioxide do not meet the national air quality objectives. (Saffron Walden Town Council; PSLP2370) & (Saffron Walden and Little Walden Neighbourhood Plan; PSLP2966) • The lack of any environmental programme. The Evidence Base documents include various landscape and visual impact studies and ecological assessments of the new site proposals but no work at all has been done by the Council in terms of overall environmental planning as part of the Local Plan process. (Newport Parish Council; PSLP3003)

MODIFICATION REQUEST	<ul style="list-style-type: none"> The phrase “where there is a risk that” should not be used. The AQMA is in place because levels of nitrogen dioxide do not meet the national air quality objectives. (Saffron Walden Town Council; PSLP2370) & (Saffron Walden and Little Walden Neighbourhood Plan; PSLP2966)
Policy EN1 Protecting The Historic Environment	
SUPPORT	0
OBJECT	8
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Adding thousands of new residents to the area will speed up the environment degradation regardless of how many admirable conservation schemes you put in place. The only safe environment is one that is not impacted heavily by human activity. Parts of rural Essex fit that description, but not for long if this plan goes ahead. (PSLP48) The first sentence “preserves or enhances” is not in accordance with paragraph 131 of the NPPF which requires “sustaining and enhancing”. (Sworders; PSLP856) Proposals will be considered against the wider social, cultural, economic and environmental benefits that the historic environment can bring. It is not clear what this means or how it reflects the NPPF. (Sworders; PSLP856) Building on the hilltop and hillsides, as is proposed at NUGC, is contrary to the traditional pattern of Uttlesford settlements being housed in the valley bottoms, and would make the NUGC visible for miles around. The light pollution created would be considerable and detrimental. (PSLP1059) We object to the new Policy EN1 and the change made to the Reg 18 draft, which provided that development would be supported where it “protects and enhances” the historic environment; the Reg 19 draft provides only that development preserves or enhances. (WeAreResidents.org; PSLP2268) We note with concern the failure to assess the impact on the environment in proposing site allocations “as far as are aware for example, although developers look at the traffic impact of their development on the road network, there has never been any assessment of the impact of the effect of additional traffic attributable to any developments on the historic centre of Saffron Walden, the Conservation areas or any historic assets. (WeAreResidents.org; PSLP2268)
MODIFICATION REQUEST	<ul style="list-style-type: none"> We suggest the use of the word 'conserves' instead of 'preserves' in para 1. (Historic England; PSLP1885) Proximity to Hatfield Forest should be listed as a constraint for allocated residential sites within the Hatfield Forest Zone of Influence, as with Policy TAK1. Reference could be made to Policy ENV1 and the requirement to carry out a SSSI Impact Assessment (The National Trust; PSLP2494) Policy EN1 refers to support being given for development

	which "preserves or enhances the significance of the historic environment". However, the revised Framework refers at paragraph 185 to the need to "set out a positive strategy for the conservation and enjoyment of the historic environment". (Endurance Estates; PSLP2824)
Policy EN2 Design of Development within Conservation Area	
SUPPORT	0
OBJECT	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Policy unduly restrictive with "conserves and enhances" not clear why the first sentence departs from the NPPF (Paragraph 131) (Sworders; PSLP857) • Does not align with the NPPF p 132-134 with wording "development will be permitted where there is no detrimental visual impact." (Gladman; PSLP2812)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Replace "Conserves and Enhances" with "sustain and enhances" (Sworders; PSLP857) • Amend character and appearance to character or appearance in line with the provision of the Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (Historic England; PSLP1886)
Policy EN3 Protecting the Significance of Conservation Areas.	
SUPPORT	0
OBJECT	5
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Not Consistent with NPPF paragraph 134 which provides a balancing exercise which states; "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal". Paragraph 133 states that "where substantial harm or total loss of significance of a designated heritage asset is proposed, consent should be refused unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh the harm or loss." (Grosvenor; PSLP965) • We note with concern the failure to assess the impact on the environment in proposing site allocations (WeAreResidents.org; PSLP2269) • This Policy should also state that development outside the Conservation Area must not have a detrimental impact on traffic within the Conservation Area. (Saffron Walden Town Council; PSLP2366) • Object as EN3 in its drafted states that development will only be permitted where it is not detrimental to character. This is not in line with the advice set out in the Framework (Gladman; PSLP2813)

MODIFICATION REQUEST	<ul style="list-style-type: none"> Amend the policy wording to ensure consistency with the NPPF: “Development outside of the conservation area which might otherwise affect its setting will only be permitted where it is not detrimental harmful to the character, appearance or significance of the Conservation Area and does not adversely affect listed buildings or non-designated heritage assets, either within or outside the Conservation Area, unless such harmful impacts are outweighed by public benefits arising from the development.” (Grosvenor; PSLP965)
<u>Policy EN4 Development Affecting Listed Buildings</u>	
SUPPORT	0
OBJECT	7
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none">
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> This policy fails to cover buildings for which there is a listing application pending. (Saffron Walden Town Council; PSLP2367) Unduly restrictive and not consistent with National Policy; (Sworders; PSLP858) It is not in conformity with the guidance set out in the Framework.
MODIFICATION REQUEST	<ul style="list-style-type: none"> Should be much more specific concerning sports provision and playing fields; proper air quality assessments; a review of the housing need (the models employed are suspect and open to criticism); lower upper limit on housing densities; proper traffic assessment (PSLP687) “Suggested wording in relation to demolition: “Demolition of a Listed Building or development proposals that result in substantial harm or total loss of significance of a heritage asset will not be permitted unless it can be demonstrated that the loss is necessary to achieve substantial public benefits that outweigh that harm”. (Sworders; PSLP858) Development should preserve the listed building and its setting. (Historic England; PSLP1887)
<u>Policy EN5 Historic Parks and Gardens</u>	
SUPPORT	0
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
<u>Policy EN6 Scheduled Monuments and Sites of Archaeological Importance</u>	
OBJECT	1
SUPPORT	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Historic England welcomes the inclusion of a policy for non-designated heritage assets of local importance in the Plan. (Historic England; PSLP1892)
SUMMARY OF	<ul style="list-style-type: none"> We strongly support the statement in in para 10.31 of the

REPRESENTATIONS IN OBJECTION	supporting text that ancient woodland is an irreplaceable habitat and hence that permission for any development which damages it should be refused. This is entirely consistent with the direction of travel of national planning policy where it states in the new NPPF at para 175c that: development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons ⁵⁸ and a suitable compensation strategy exists; However the plan cannot be considered sound, as this strong stance is contradicted by the wording of policies EN7 and EN9 where the protection of ancient woodland is heavily qualified by references to social and economic benefit of development
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Incorporate the wording of para 10.31 into the wording of policies EN7 and EN9 or follow the wording on ancient woodland and veteran tree protection in the new NPPF (The Woodland Trust; PSLP 1892)
Policy EN7 Protecting and Enhancing the Natural Environment	
OBJECT	2
SUPPORT	16
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • We note that our comments have been included (Environment Agency; PSLP610) • Paragraph 10.24. Local Nature Reserves have been listed as non-statutory in this paragraph. However, they are protected under the National Parks and Access to the Countryside Act 1949. Local Nature Reserves must be described as statutory. (Essex County Council; PSLP940) • Paragraph 10.32. UDC (Development Management) has three Biodiversity checklists (for householder, minor and major developments) but reference to the checklists is not been included within this or other sections of the Local Plan. Checklists are a mechanism for delivering policy and should be required. (Essex County Council; PSLP944) • The wording of Policy EN7 is insufficiently clear and robust and does not fully reflect NPPF guidelines on Habitats and Biodiversity (Essex Wildlife Trust; PSLP960) • The last paragraph of the policy text introduces the requirement for compliance with aerodrome safeguarding considerations. This is welcomed and supported. However, the wording requires some alteration to remove ambiguity. Specifically, the policy only seeks that aerodrome safeguarding matters should be considered for “Measures to enhance biodiversity “This is too narrow, albeit perhaps unintentionally. All schemes that address biodiversity, whether they create, enhance or maintain, need to consider aerodrome safeguarding matters. (MAG; PSLP1522)

	<ul style="list-style-type: none"> • Environmental protection issues will not be sustained unless there is a robust system of co-ordination of utility works to ensure that essential works are carried out at the same time and not sequentially. A system of robust sanctions to ensure compliance is also needed. This also applies to the impact of construction traffic on the natural environment. (Sustainable Uttlesford; PSLP2031) • Paragraphs 10.25, 10.26,10.64 and Policy EN7 It contains many proposals (described above) that have already been shown, over the years, to conflict with the principles of sustainable development, conservation and mitigation, protection of character, and transport planning. Inadequate provision of mitigation for protected species. (PSLP2330) • Natural England set out their mitigation regarding the impact of the policy on Hatfield Forest. They highlight that the due to distances, Epping Forest can be screened out of the Uttlesford Local Plan. (Natural England; PSLP2448) • Whilst it indicates that an ecological survey will be required, it does not clearly set out that an impact assessment will be required, as indicated in para. 10.32. Hatfield Forest SSSI and NNR is an asset to the Uttlesford District but is currently in “Unfavourable Recovering” condition as explained above. The National Trust would like to see a policy which requires developers to submit a SSSI Impact Assessment if their site falls within an established Zone of Influence (as defined in the National Trust’s evidence report). Any development which alone, or cumulatively would have an adverse impact upon Hatfield Forest should provide or contribute towards appropriate on-site or off-site mitigation. Such mitigation could include visitor and botanical monitoring, visitor and community education and infrastructure maintenance. Ideally any contributions should be linked to a tariff style charging schedule based upon the number of bedrooms per dwelling. This policy is not consistent with national policy and would not be effective in ensuring that new developments would not have an adverse impact upon nationally important SSSI sites. (The National Trust; PSLP2489) • This part of the Plan sets out polices for each of the sites allocated in the plan for residential development. The constraints for each site are listed under the policy. However proximity to Hatfield Forest is only listed as a constraint under Policy TAK 1 (Land between 1 Coppice Close and Hillcroft, South of B1256, Takeley Street). The National Trust considers that this constraint should be listed for all those sites falling within the 10.4km winter Zone of Influence. (These are ref: DEB1, ELS1, GtDUN 1, GtDUN 2, GtDUN3, Gt DUN 4, GtDUN 5, GtDUN 11, GtDUN11, GtEAS 1, QUE 1, STA 1, TAK 1, TAK 3, THA 1) (The National Trust; PSLP2492) •
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Paragraph 10.23. Correction and advisory Please note that Essex Biodiversity Project is still hosted by Essex Wildlife Trust but it no longer exists as a partnership. The sentence needs to

	<p>be edited to provide an updated position. Change paragraph 10.23 to read: The strategy is to protect and enhance biodiversity within the District working with partners including the Essex Wildlife Trust and through controls on development to reduce potential impacts on sites which may have importance for biodiversity. (Essex County Council; PSLP936)</p> <ul style="list-style-type: none"> • Paragraphs 10.24 and 10.26. County Wildlife Sites are mentioned in paragraph 10.24 and Local Wildlife Sites in paragraph 10.26. The two are the same thing and the change of terminology creates confusion and inconsistency. Change paragraph 10.24 so that reference to “County Wildlife Sites” is replaced to “Local Wildlife Sites” (Essex County Council; PSLP936) • Change paragraph 10.24 to read: “and the statutorily protected Local Nature Reserves and” (Essex County Council; PSLP940) • Change paragraph 10.32 (or a new paragraph) to set out the requirement for the applicant to submit a UDC supplied Biodiversity Checklist where there is potential to affect biodiversity. (Essex county Council; PSLP944) • Change to read. "The Council will promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species". The policy statement "Such measures should include making a contribution to the network of biodiversity sites, including open spaces and green infrastructure and water bodies which make links between habitats and support wildlife. Measures should also attempt to link wildlife habitats together, improving access to, between and across them" should include additional wording as follows: "Developments should be expected to deliver net measurable gains in biodiversity." (Essex Wildlife Trust; PSLP1057) • Improve access to open space where a significant opportunity exists to achieve a substantial gain whilst protecting and enhancing the natural environment and reducing the risk of flooding. The integration of Aubrey Buxton Nature Reserve, Alsa Wood and Gall End Meadow to act as a green lung benefit to family recreation would achieve this. (Stansted Mountfitchet Parish Council; PSLP2625)
Policy EN8 Open Spaces	
SUPPORT	1
OBJECT	10
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Following our comments on the previous consultation we welcome the changes to this policy.
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • The penultimate paragraph of the policy is broadly similar to criterion (d) of policy INF2 but the wording is slightly different. First, as this part of the policy is focused on protection of school/college playing fields rather than other open space types it is unclear why the relevant part of policy INF2 is

	<p>broadly repeated in policy EN8 as it is difficult to understand what additionality it offers plus there may be confusion over what policy takes precedence when assessing proposals on school/college playing fields. Furthermore, as the wording of the two policies is slightly different (INF2 refers to just playing fields and EN8 refers to playing fields and other formal sports provision) there is a consistency issue. (Sport England; PSLP67)</p> <ul style="list-style-type: none"> • The policy is effectively a duplication of policy INF 2 so it is not clear to a decision maker which policy is to be applied. (Sworders; PSLP863) • The plan attached to the Regulation 19 draft at chapter 98 however removes a number of green space designations, including almost all of the playing fields on the Friends School site, which is one of the few central green spaces and the only central sports provision. Given the findings of the 2012 Open Space etc document which identified a major deficit in green space of all kinds in Saffron Walden, this must be unsustainable. (WeAreResidents.org; PSLP2259) • POLICIES EN 8 and EN 9 Neither of these policies on Open Spaces or Ancient Woodland and Protected Trees mention the value that such land has as a natural defence against flooding. These policies aim to protect the existing natural environment but fail to meet the NPPF requirement to enhance it. (Saffron Walden Town Council; PSLP2368) • Policy EN8 should include a commitment by the Council for an agreed Epping Forest Mitigation Strategy to be in place by the time the Local Plan is adopted. The policy should also require relevant development to deliver the mitigation measures identified in that Strategy. Natural England is aware that preparation and agreement of the Strategy is dependent upon the findings and mitigation measures identified through the emerging Epping Forest DC HRA. We welcome amendments to address our previous advice, to distinguish the hierarchy of designated sites, as required by paragraph 171 of the NPPF. (Natural England; PSLP2461) • Natural England believes that the Uttlesford Local Plan should include a green infrastructure policy or preparation of Green Infrastructure Strategy for cross-reference within relevant policies. Policy EN8 Open Spaces could be easily amended to include reference to wider green infrastructure issues and requirements to protect and enhance the district's GI network. This will ensure that the plan is consistent with paragraph 171 of the NPPF in taking a strategic approach to GI. (PSLP2567; Natural England) • Refer to full National Trust Representation in File. Hatfield Forest is under significant recreational pressures, caused by increased patronage. (National Trust PSLP2484) • Neither of these policies on Open Spaces or Ancient Woodland and Protected Trees mention the value that such land has as a natural defence against flooding. (Saffron Walden and Little Walden Neighbourhood Plan; PSLP2964)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • To address the potential clarity and consistency issues associated

	<p>with including two similar but slightly different policies relating to developments on school/college sites, it is suggested that a minor modification is made to the plan to remove the penultimate paragraph of policy EN8 and modify criterion (d) of policy INF2 to extend the scope to include “or other formal sports provision on the site” (Sport England; PSLP67).</p> <ul style="list-style-type: none"> • These policies should make mention flood prevention as one of their benefits to be safeguarded. These policies aim to protect the existing natural environment but fail to meet the NPPF requirement to enhance it. Additional policies should be added which reflect this NPPF requirement. (National Trust PSLP2484) •
<u>Policy EN9 Ancient Woodland and Protected Trees</u>	
SUPPORT	0
OBJECT	9
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • The Local Plan makes provision for the removal of these trees if the needs and benefits of the development clearly outweigh the loss. How can this be sound when the needs and benefits test is totally subjective and invariably economically biased. (PSPL434) • There will be some smaller areas which are not included (if less than 0.25ha), but would still have ecological value. By stating that all ancient woodland will be shown on the Policies map, the policy wording effectively, but presumably unintentionally, excludes protection of these other areas, which are still “irreplaceable” habitat. (Essex County Council; PSLP948) • Reading the supporting text and policy wording the term “protected trees” in the heading of Policy EN 9 should be replaced with “veteran trees” Some of these may also be protected but it is likely that the majority of the district’s important trees may not be formally protected. The policy wording should also state that where identified UDC will utilise the legislation available to serve Tree Preservation Orders to protect both veteran and other important trees. (Essex county Council; PSLP951) • The NPPF requirement is to enhance the natural environment, not just to ensure no harm, and this should be reflected in the Policy. This section generally also appears to fail to accord with the NPPF requirement for a strategy to enhance the natural and historic environment; we are not aware that UDC has any such strategy, and there is none apparent in the draft Plan. We are also concerned that the Policy EN9 has been significantly weakened from the Reg 18 draft, and now applies only to significant sites and impacts. (WeAre Residents.Org; PSLP2270) • This text needs to be amended to state an FRA is a requirement of the NPPF rather than Environment Agency standing advice. (Environment Agency; PSLP2919)

	<ul style="list-style-type: none"> Neither of these policies on Open Spaces or Ancient Woodland and Protected Trees mention the value that such land has as a natural defence against flooding. (Saffron Walden and Little Walden Neighbourhood Plan; PSLP2965)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Change Policy EN 9 to make it clear that areas of Ancient Woodland that are less than 0.25ha and therefore not on the Policies Map receive the same level of protection as those shown on the Policies Map. (Essex County Council; PSLP948) Policy and supporting text paragraph 10.39 This text needs to be amended to state an FRA is a requirement of the NPPF rather than Environment Agency standing advice. (Environment Agency; PSLP2919) These policies should make mention flood prevention as one of their benefits to be safeguarded. These policies aim to protect the existing natural environment but fail to meet the NPPF requirement to enhance it. Additional policies should be added which reflect this NPPF requirement.(Saffron Walden and Little Walden Neighbourhood Plan; PSLP295)
<u>Policy EN 5 1 Scheduled Monuments and Sites of Archaeological Importance (To be renumbered)</u>	
SUPPORT	0
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> An important Roman temple (a Scheduled Monument) and a number archaeological finds mean the area over which the development would take place has great historic value. Much of this would be permanently damaged (PSLP1011) There is no reference to the test for less than substantial harm in this policy. Given that substantial harm is mentioned, for completeness then this should also be included in the policy. (Historic England; PSLP1890)
MODIFICATION REQUEST	
<u>Policy EN10 Minimising Flood Risk</u>	
SUPPORT	0
OBJECT	6
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Insufficient attention is given within the policy to oblige developers to consider and take responsibility for drainage and water discharge immediately outside the boundaries of their development sites. This is particularly important where developers choose to discharge surface water from their on-site SuDS into nearby watercourses and ditches. (PSLP703) As noted in the Council's Infrastructure Delivery Plan there is an expectation that improvements to the existing foul sewerage networks are expected to be required for the

	<p>allocation sites identified in the Local Plan including the proposed Garden community sites. The information previously provided by Anglian Water also identified potential constraints at existing water recycling centres (formerly sewage treatment works) to accommodate specific allocation sites which would need to be aligned with further investment through Anglian Water’s Business Planning process. Policies EN10 and EN11 refer to risk of flooding from fluvial and surface water flooding but not sewer flooding. Similarly the allocation policies for Anglian Water area do not include reference to this issue with the exception of the garden community policies. (Anglian Water; PSLP913)</p> <ul style="list-style-type: none"> • he NUGC would alter the pattern of water-flow for the River Cam downstream fundamentally, substantially and unpredictably."The science of climate change suggests an even greater risk of flooding in the future and therefore there is an exceptional duty on councils, planners and developers to offer more than flimsy assurances, unsupported by evidence. (PSLP1002) • Flooding With 5000 new homes, together with the hard standing areas this will result in, there will be significant run-off from this development. Development in this location has the potential to increase the level of flood risk from the River Cam downstream by increasing surface water run-off. (PSLP1768) • Anglian Water is largely supportive of policy EN10 which is intended to ensure that no increased risk of flooding to existing properties. However it is focused on fluvial sources of flooding and does not include reference to sewer flooding or sewage treatment consistent with Council’s Water Cycle Study and Infrastructure Delivery Plan. (Anglian Water; PSLP2516)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • We would recommend that Policy EN10 includes specific reference to foul sewerage systems and the potential risk of flooding from this sources. Therefore it is suggested that Policy EN10 include the following additional text: “Development proposals should demonstrate that adequate foul water treatment and disposal already exists or can be provided in time to serve the development” (Anglian Water; PSLP913) • We would recommend the following text to prevent confusion over (3a) and 3b: "All proposals for development of 1 hectare or above in Flood Zone 1 and for development in Flood Zones 2 and 3 must be accompanied by a flood risk assessment that sets out the mitigation measures for the site and agreed with the relevant authority. Development in these flood zones must accord with those categories in Table 3 Flood Risk Vulnerability Classification, which are described as appropriate for this Flood Zone". (Environment Agency; PSLP2920)
Policy EN11 Surface Water Flooding	
SUPPORT	4
OBJECT	2

SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • We support the requirement to use SuDs and that alternative method of surface water disposal will only be considered where it is demonstrated that there are no reasonable alternatives. This is consistent with the surface water hierarchy and would help to ensure that new development does not increase the risk of surface water and sewer flooding. (Anglian Water Services; PSLP871) • A strategy of Green Infrastructure provision to adapt to or mitigate the effects of Climate change needs to be developed for the Garden Settlements to include Sustainable urban Drainage Systems and to increase biodiversity. This infrastructure can also encourage walking, cycling and other health and wellbeing activities (Sustainable Uttlesford; PSLP1524)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • SUDs systems in close proximity of safeguarded aerodromes can pose a bird hazard risk which may affect the safe and efficient operation of aerodromes and aircraft, as detailed in The Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction 2002. (MAG; PLSLP1524) • Run-off from new developments into open water courses should be prohibited wherever possible if the water course leads into a drainage system. A provision should be included whereby developers are under a continuing obligation to maintain water courses which discharge into a drainage system. The penultimate paragraph should be amended to include a stipulation that developments within 10 kms of Stansted Airport must be referred to the Airport authority. (Elsenham Parish Council; PSLP337) •
MODIFICATION REQUEST	<ul style="list-style-type: none"> • The paragraph should be amended to read: SUDs systems should be designed so as not to increase the bird hazard risk or affect the safe operation of London Stansted Airport or the movement of aircraft; where appropriate the implementation of a long term maintenance of SUDS plan and of a bird hazard management plan will be secured by condition or planning obligation. (MAG; PLSLP1524) •
Policy EN12 Protection of Water Resources	
SUPPORT	0
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Water supply shortage. I would like to draw the following to the Inspector's attention: The predicted water consumption figures in these documents already factor in water saving measures and best building practices. Nevertheless, water consumption for the district needs to increase according to the Arcadis report by about 1.3m tonnes a year. Neither the Hyder report nor their successor Arcadis say where this would come from. There is a reference to it

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	<p>coming from “the west”. There is no explanation of this or evidence to support its viability. The requirement in the report only runs to 2033. However the new settlements if adopted in the Plan will need to be built out. So just counting up to 2033 is not valid. (PSLP2540)</p> <ul style="list-style-type: none"> It would appear that the Local Plan should be brought up-to-date to reflect the New Connection Charging process implemented in April 2018, in line with OfWat guidance. (Bovis Homes; PSLP2575)
MODIFICATION REQUEST	<ul style="list-style-type: none"> This process sets out how off-site sewerage and wastewater supply capacity is provided, levying a fixed New Connection Charge on the developer, with the upgrade works to be provided and funded by the water provider (rather than planning obligations being sought from a developer to fund any off-site works as is currently indicated in the policy). (Bovis Homes; PSLP2575)
Policy EN13 Minerals Safeguarding	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> The policy is too onerous and not in accordance with the Framework. A blanket policy seeking to refuse development where it is demonstrated that minerals will be sterilised is contrary to this guidance as an exercise should be carried out to assess whether it is practicable and feasible to extract the mineral before a decision can be made on the application. (PSLP 2817)
MODIFICATION REQUEST	
Policy EN14 Pollutants	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<p>Natural England is generally satisfied that the policies incorporate sufficient requirements to ensure no adverse impact to the natural environment through development of contaminated land and pollution. Policies also offer adequate protection of water-dependent designated sites. The Environment Agency as lead authority needs to advise on the soundness of the policies. (PSLP2463 Natural England)</p>
MODIFICATION REQUEST	
Policy EN15 Air Quality	
SUPPORT	0
OBJECT	12
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> This policy says that development should be permitted where it can be demonstrated that it does not lead to significant adverse effects on health, the environment, or amenity. By implication, adverse effects on health, the environment and amenity are

	<p>permitted as long as they are smaller than significant. (Saffron Walden and Little Walden Neighbourhood Plan; (PSLP2967)</p> <ul style="list-style-type: none"> • The Regulation 19 Consultation Document has a lack of evidence base behind it including lack of an Air Quality assessment. Air pollution in the district has exceeded legal limits in almost every single year for the last 10 years. An Air Quality Technical Assessment guide was published as part of the evidence but this is not a substitute for a proper Air Quality assessment to establish whether Policy allocations are sustainable locations and this should be done at a strategic level. The January to June 2018 NO2 mean is 40.63mcg per cubic metre and this is over the legal limit of 40mcg. In Newport, taking into account permitted development not yet built and application in progress the forecast for the annual mean will reach 54mcg. The air quality breach is not only in Saffron Walden but along the B 1383 corridor and similar high readings in Stansted Mountfitchet. (PSLP 3006) • The plan has no Environmental Impact Assessment for the extra traffic pollution created by new settlements and further allocations in towns and villages. Air pollution in the district has exceeded legal every year for the past 10 years. Air quality assessment for the plan should be done at a strategic level. Audited nitrogen dioxide levels in Saffron Walden have been illegal since 2011 and worsening. Traffic from the new settlements will add to the pollution in Saffron Walden. The air quality breach is not only in Saffron Walden but along the B 1383 and Stansted Mountfitchet. The Sustainability assessment for the Plan makes this comment against policy EN15 (PSLP 2538) • Increases to air pollution not addressed sufficiently in the plan and these will increase sharply due to increased traffic levels that will breach legal requirements (PSLP 1523) • Whilst this policy incorporates general requirements for development to demonstrate no adverse impact to the natural environment, through emissions to air, we are not satisfied that these offer adequate protection to air quality sensitive designated sites. Risk to designated sites, particularly Epping Forest SSSI, SAC and Hatfield Forest SSSI, through traffic related emissions to air, is a key issue for the Uttlesford Local Plan as detailed in our comments throughout the consultation process and highlighted in the HRA and SA. In order to be considered sound and compliant with legal and national planning policy requirements to protect designated sites, Policy NE15 must acknowledge potential risks to Epping Forest and Hatfield Forest, and other designated sites, and include a commitment to address any adverse effects in accordance with our detailed advice on policies SP8, SP11 and EN7. As currently worded Natural England considers Policy NE15 to be unsound. The above policy requirements should be implemented to ensure that the policy is compliant with legal and national planning policy obligations. (Natural England; PSLP 2465) • The 2017 Air Quality Annual Status Report states that traffic emissions are the most significant source of air pollution within the district and within Saffron Walden. Due to exceedances in Nitrogen Dioxide (NO2) levels UDC had to declare an Air Quality
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	<p>Management Area (AQMA) within Saffron Walden town centre and have done so for some years. (PSLP 1627)</p> <ul style="list-style-type: none"> • This policy says that development should not be permitted where it can be demonstrated that it does not lead to significant adverse effects on health, the environment, or amenity. By implication, adverse effects on health, the environment and amenity are permitted as long as they're smaller than significant (PSLP 2371). • The air quality within Uttlesford is already in breach of national guidelines and safety limits. There is nothing in the local plan to indicate how this will be addressed with the additional traffic produced by the development of a new garden community.(PSLP 1111) • The supporting evidence for the plan does not include an overall Air Quality Assessment. Thus it is impossible to judge whether the selected sites for development are the most sustainable. EN15 The policy does not reflect the NPPF requirement to consider the cumulative effect of development on air quality. Individual assessments by applicants do not fulfil this requirement. (PSLP 695) • Significant shortage of open space in Stansted Mountfitchet not addressed in plan as well as no specific proposals on footpaths, cycle ways, reduction in traffic flows (indeed the opposite) or reducing unacceptable levels of air pollution. , An immediate requirement would be to establish an Air Quality Management Plan. Traffic management policies will be critical in reducing emissions. (PSLP 2624) • The Local Plan has no Air Quality Assessment. No Air Quality Assessment has been performed, despite the continuing illegal pollution levels, and despite the Regulation 19 draft proposing material new development in and near Saffron Walden. (PSLP 2598) • 157. Paragraph 10.57 is clearly wrong – the most recent UDC monitoring results show 4 junctions at which NO2 limit values are breached, and this should be clearly stated. The legal NO2 levels have been breached in almost every single year for the last 10 years; given the clearly identified impact of air pollution on human health, we cannot understand why the Council will not acknowledge the current position or take steps to address it. We largely support the wording of Policy EN15, which is now greatly improved from the Reg 18 draft. However, it is still contrary to the NPPF in that it fails to take account of the cumulative impact of developments on air pollution – policy EN15 needs to be amended to reflect this, and in addition the Regulation 19 draft needs to be supported by a proper AQA assessing the cumulative impact of all proposed development on areas where air pollution is an issue to determine whether or not the Regulation 19 draft plan allocations are sustainable.(PSLP 2271)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • The Neighbourhood Plan insists on better protection for its residents and would like the policy to be re-worded to remove the word “significant”(PSLP 2967) • Take out 600 houses from the total right now. Need to stop, look and remove from the plan those sites which will add most illegal

	<p>pollution to the existing illegality.(PSLP 2538)</p> <ul style="list-style-type: none"> • Air pollution and measures to combat air pollution needs to be addressed. The numbers of houses required is in sharp contrast to the numbers being built at it is developer led, which will mean the majority will be built for profit not local need. Other options for building houses only reflective of housing need on a local level must be explored as many more houses will create increased traffic and potentially illegal levels of air pollution. (PSLP 1523) • The Town Council insists on better protection for its residents and would like the policy to be re-worded to remove the word “significant” (saffron Walden Town council; PSLP2371) • Ensure, following stringent monitoring of emission levels, that policies to prevent the adverse health impact of air pollution, not least in schools, are introduced (Stansted Mountfitchet Parish Council; PSLP 2624) •
<u>Policy EN16 Contaminated Land</u>	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Natural England is generally satisfied that the policies incorporate sufficient requirements to ensure no adverse impact to the natural environment through development of contaminated land and pollution. Policies also offer adequate protection of water-dependent designated sites. The Environment Agency as lead authority needs to advise on the soundness of the policies.
MODIFICATION REQUEST	
<u>Policy EN17 Noise Sensitive Development</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
<u>Policy EN18 Light Pollution</u>	
SUPPORT	0
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • At present, the night skies in the area enjoy a good amount of darkness compared to many parts of the country, but increased development has already led to growing levels of light pollution that detract from the rural environment and threaten wildlife. A hillside development of the scale proposed would cause a devastating level of light pollution that would create a

	<p>predominantly suburban night-time atmosphere in the area. The importance of the night-sky and night-time darkness for the sense of space in the countryside together with the well-being of residents should not be underestimated, but there is no evidence that this has been considered as part of the decision making process behind the NUGC proposal. (PSLP672)</p> <ul style="list-style-type: none"> • The proposed NUGC development on a hilltop and hillsides is contrary to the traditional pattern of settlements in Uttlesford. The proposed will be highly visible, development will create light pollution and no mitigation thorough tree-planting or limiting house heights would lessen the impact. The location of NUGC will encourage reliance on cars and trains. The development will contribute to flooding further down the valley. The proposed development is on prime agricultural land. The site contains important archaeology, a scheduled monument and prehistoric paths.(PSLP 1055)
MODIFICATION REQUEST	

<i>Uttlesford District Council Regulation 19 Pre-submission Local Plan; Summary of Responses</i>	
Section / Paragraph / Policy	Summary of Responses
11. Countryside	
SUPPORT	0
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • The plan is a response to government numbers and sees the solution through the provision of Garden Communities that are not deliverable. Should the Garden Community proposals proceed urbanisation will spread from Tendring to Gilston in East Hertfordshire resulting in loss of the countryside. (PSLP 747) • Being located on rolling hills the North Uttlesford Garden Community would destroy the landscape visual beauty and be visual from a wide area including neighbouring Cambridgeshire villages and passing M11 traffic. The unique architectural heritage will be destroyed as well. (PSLP 728) • North Uttlesford Garden Community will permanently destroy the uplands, the skyline, good quality agricultural land and add to urbanisation of what is currently essentially a rural landscape and rural communities. The site is highly visible and no amount of landscaping or planting of trees will hide the development (PSLP 660) • The scale of the proposed development will have a significant adverse impact on local wildlife which is already under threat from pollution, light pollution, drought, building, road traffic, hunting and industrial farm practices. (PSLP 49)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • UDC should finance and install road traffic calming measures in local villages to slow down traffic from rat runners (PSLP 49)
<u>Policy C1 Protection of Landscape Character</u>	
SUPPORT	0
OBJECT	6
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Unjustifiable site selection including selection of North Uttlesford Garden Community; proposed development on the hillsides is at odds with historic developments in the valleys; and • The site cannot accommodate the development without causing significant and unacceptable harm to the important visual qualities of the site and wider landscape. No adequate mitigation is possible. (PSLP 2014) • North Uttlesford Garden Community development will result in a change of character on a huge scale unsupported by investment in infrastructure or local services. (PSLP 1978) • Policy effectively prevents any development that has a view which is inconsistent with national policy which requires protection of valued landscape; and

	<ul style="list-style-type: none"> • There are outstanding issues with neighbouring authorities regarding elements of the Plan that must be addressed in order for the Council to confirm that it complies with the duty to co-operate. (Grant and Bloor Homes, PSLP 2910) • Policy C1 is not framed in line with guidance set out in the framework as it does not provide for a planning balance exercise to be undertaken by the decision maker. (Gladman PSLP 2818) • Policy not supported (Stansted Mountfitchett Parish Council PSLP 2627) • Historic England welcomes this policy but requests the deletion of the word 'material' from bullet point 6. This policy would appear to be at odds with some of the proposals in the plan, most notably the North Uttlesford Garden Community (Historic England, PSLP 1894)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Policy C1 and its supporting text should be deleted in its entirety. • Policy C1 should be reworded to allow the decision maker to undertake a Framework compliant planning balance exercise so that failure to meet any one of the criteria listed would not automatically mean failure to conform with the policy overall (Gladman PSLP 2818) • Amendment to Policy C1 paragraph 6 to read “No material harm is caused to the SCALE, form and alignment of protected historic lanes” (Stansted Mountfitchett Parish Council PSLP 2627) • Deletion of the word 'material' from bullet point 6. This policy would appear to be at odds with some of the proposals in the plan, most notably the North Uttlesford (Historic England, PSLP 1894)
Policy C2 Re-use of Rural Buildings	
SUPPORT	1
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • While sound, it would be positive to include a further policy caveat to state that development should protect or enhance the significance of designated and non-designated heritage assets (Essex County Council PSLP 952)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Objection on the basis that it is unduly restrictive and is not consistent with national policy. Specifically, “permanent and substantial construction” is only a Green Belt test so should not be applied to buildings outside of the Green Belt. This would conflict with paragraph 55 of the NPPF which applies no such test; • The draft policy wording is too restrictive and will prevent sustainable development from coming forward. The policy is therefore contrary to national policy and requires revision; and • The reference to a potential requirement for additional buildings is not in accordance with national policy as it places additional policy burdens on the applicant, not supported by the NPPF. Applications for additional buildings should be assessed on their own merits.(Sworders 865)

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Summary of Reg 19 Representations Chapter 11 Countryside

MODIFICATION REQUEST	<ul style="list-style-type: none"> UDC may wish to change Policy C 2 to include an additional point to the policy: “The development would protect or enhance the significance of designated and non-designated heritage assets, including the contribution made by their setting and/or group value.” (Essex County Council PSLP 952) Delete point 1; and Delete from point 4 “and the buildings loss would not result in additional buildings being required. (Sworders 865)
Policy C3 Change of Use of Agricultural Land to Domestic Garden	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
Policy C4 New Community Facilities Within the Countryside.	
SUPPORT	1
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> The policy recognises that in principle outdoor sports facilities may be justified in the countryside beyond development limits of settlements (Sport England PSLP 69)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> We again suggest that such provision should conserve and enhance the historic environment. The recent example of pre-school provision outside the development limits of Great Chesterford is one such example where in our view insufficient protection has been afforded to the historic environment. (Historic England PSLP 1896)
MODIFICATION REQUEST	<ul style="list-style-type: none"> We again suggest that such provision should conserve and enhance the historic environment. (Historic England PSLP 1896)

<i>Uttlesford District Council Regulation 19 Pre-submission Local Plan; Summary of Responses</i>	
Section / Paragraph / Policy	Summary of Responses
12. Site Allocations	
SUPPORT	0
OBJECT	25
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • The Local Plan identifies a number of assets that would affect heritage assets. The need to protect such assets should be identified in the policy. (PSLP1898 Historic England) • All relevant Local Plan allocations which will have air pollution impacts on Epping Forest SAC or Hatfield Forest SSSI and / or are within the ZoI for Hatfield Forest SSSI for recreational pressure impacts, alone or in-combination should be identified through the SA and HRA where appropriate. The SA should recommend policy requirements to ensure the delivery of any agreed mitigation measures. The SA should assess impacts and identify recommendations to address potential adverse effects to designated sites, and contribute towards priority habitat enhancement, through a requirement in Policy EN7. (PSLP2468 Natural England) • Sites falling within the 10.4Km ZoI around Hatfield Forest do not list proximity to Hatfield Forest as a constraint. (PSLP2490 National Trust) • In the allocation policies. , the Plan asks for a Landscape and Visual Impact Assessment (LVIA) on developments which is welcome in spirit but this term only applies to sites which require an Environmental Impact Assessment. This has come about because in an Assessment (LVIA) landscape architects are asked to assess the significance of landscape and visual effects; it was considered that if the significance was assessed as moderate or severe, then it might trigger the need for an EIA which was probably unnecessary. For non EIA sites a Landscape and Visual Appraisal is required which is a narrative response and significance is not assessed. Some of the sites may well require an EIA but most won't. (PSLP2636 Stansted Mountfitchet PC) • It would assist the reader to include an "introduction" to the site allocations chapter of the Local Plan, as done for other chapters. This would explicitly state that the Local Plan in its entirety applies, as well as the site specific requirements; and provide a clear link to Policy INF 1 to capture all infrastructure requirements (PSLP956 ECC) • In the site allocation section, some residential site allocations policies require ecology surveys while others do not. It is not clear why there is a distinction but this implies that for those sites where it is not listed, an ecological survey is not required. While the potential for impacts are presumably lower, it is not necessarily the case that they will not need a survey. (PSLP958 ECC) • Plan fails to take account of the benefits both in terms of delivery

	<p>and sustainability that an allocation to the south of Beldams Lane, Bishop's Stortford (Great Hallingbury Parish) for up to 180 dwellings could have on its effectiveness. (03GtHal15)(PSLP192 Bloomhall)</p> <ul style="list-style-type: none"> • Plan fails to include sites in a number of sustainable settlements and Type A Villages. (PSLP1325 Landhold Capital) (PSLP2189 J Harrison) (PSLP2711 Battlement Trust) (PSLP2767 Strutt & Parker Farms) (PSLP2990 R Coke) (PSLP2993 Landhold Capital) • Reliance on the three Garden Communities identified is unsound (PSLP2730 Baker and Metson) • Omission: Land at Great Canfield Road, Great Canfield is a site of 8.25ha and suitable for a development of 135 dwellings. (04GtCan15) (PSLP2820 Gladman) • Omission: Land at Station Road Flitch Green Little Dunmow Parish is a site of 11.52 dwellings and suitable for development. (NEW) (PSLP2821 Gladman) • Omission of identifying land at Chickney Road, Henham for residential development (07Hen16)(PSLP2991 R Coke) • Omission of identifying land at Mill Road Henham for residential development (05Hen15) (PSLP2994 Landhold Capital) • Object to omission of land at School Lane, Henham for residential allocation (04Hen15) (PSLP2688 Persimmon Homes) • Omission of 8.5 ha site at Birchanger north of Sion House CM24 8TS (NEW) (PSLP38 Newton Associates) • Omission of site at 328 Birchanger Lane, Birchanger. The Green Belt boundary in this location does not follow any physical feature that is recognisable on the ground, therefore its permanence is questioned. (10Bir17)(PSLP1586 S Del Federico) • Object to omission of land (06HBO15) south of Newbury Meadow, Off Cage End Road Hatfield Broad Oak for development. (PSLP36 J Lukies) • Object to omission of 1.2 ha land north of Hammonds Road Hatfield Broad Oak for 24 dwellings (08HBO17) (PSLP2537 H Turtill) • Object that no sites are allocated in Hatfield Broad Oak (PSLP2709 Stonebond Properties) • Object to no residential allocations in Hatfield Heath (08HHea17) (09HHea17) (PSLP2531 Pelham Structures) (PSLP2577 D Sargeant) • Object to omission of land north of Cornells Lane Widdington (02Wid15) (PSLP1615 Stonebond Properties) • Object to lack of small sites being allocated (PSLP3057 S Barker)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Expect to see more detail regarding the sites and policy criteria to indicate how the decision maker should react (para 154 and 157 of the old NPPF, para 16d and 20d of the new NPPF). We request that you review these allocations again, identifying whether there are any heritage assets (or their settings) that would be affected by the proposed development. Where a potential impact is identified, wording should be included in the policy and supporting text to this effect. WE suggest the inclusion of additional bullet point in

	<p>the site allocation. (PSLP1898 Historic England)</p> <ul style="list-style-type: none"> • The policies promoting allocations which will have air pollution impacts on Epping Forest SAC or Hatfield Forest SSSI and / or are within the ZoI for Hatfield Forest SSSI for recreational pressure impacts, alone or in-combination should include a requirement for a contribution towards implementation of the agreed mitigation strategy. We accept that these have yet to be agreed for Epping Forest and Hatfield Forest; however, a commitment to delivering the measures once agreed should be explicit within the policy. (PSLP2468 Natural England) • The following policies should identify their proximity to Hatfield Forest as a constraint (DEB1, ELS1, GtDUN 1, GtDUN 2, GtDUN3, GtDUN 4, GtDUN 5, GtDUN 11, GtDUN11, GtEAS 1, QUE 1, STA 1, TAK 1, TAK 3, THA 1) (PSLP2490 National Trust) • Amend reference of Landscape and Visual Impact Assessment to 'Landscape and Visual Appraisal, or Landscape and Visual Impact Assessment'. (PSLP2636 Stansted Mountfitchet PC) • Recommend including the following text as an Introduction to the Site Allocations chapter. "The site allocations policies identify areas for development and contain site specific requirements for the management of any site constraints, infrastructure and mitigation. These will be required in addition to general requirements for infrastructure contained in Policy INF 1, and all other relevant policies in this Local Plan. Policy INF 1 highlights general issues concerning infrastructure provision and developer contributions that affect proposals across the District and are essential to ensuring that new development adequately mitigates its impact on the surrounding area and makes a positive contribution to its character and amenity." (PSLP956 ECC) • It is recommended that a review of site allocations requirements is undertaken to ensure all relevant sites undertake an ecology survey. (PSLP958 ECC) • Allocate land south of Beldham's Lane Bishop's Stortford (Great Hallingbury Parish) for 180 dwellings (03GtHal15) (PSLP192 Bloomhall) • Allocate land at Mill Road Henham as a residential site (05Hen15) (PSLP1325 Landhold Capital) (PSLP2993 PSLP2994 Landhold Capital) • Allocated land east of Sparepenny Lane Great Sampford (01GtSam15) for 10-15 dwellings (PSLP2189 J Harrison) • Allocated Chelmer Mead Little Dunmow as an additional strategic site (03LtDun15) (PSLP2730 Baker and Metson) • Allocate land north of Stewards Way Manuden (02Man16)(PSLP2711 Battlement Trust) • Allocate land in Leaden Roding (01LRod15) (PSLP2767 Strutt & Parker Farms) • Allocate land at Great Canfield Road, Great Canfield (04GtCan15)(PSLP2820 Gladman) • Allocate land east of Station Road Flitch Green Little Dunmow Parish.(NEW) (PSLP2821 Gladman) • Allocate land at Chickney Road Henham (07Hen15) (PSLP2990
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	<p>PSLP2991 R Coke)</p> <ul style="list-style-type: none"> • Allocate Land at School Lane Henham for residential (04Hen14) (PSLP2688 Persimmon Homes) • The development site at Birchanger, north of Sion House Birchanger Essex, CM24 8TS should be included on the inset maps. (NEW) (PSLP38 Newton Associates) • A full review of the Green Belt boundary in Birchanger as suggested to include the land associated with 328 Birchanger Lane within the development limits of Birchanger and excluded from the Green Belt. (10Bir17) (PSLP1586 S Del Federico) • Either allocate land south of Newbury Meadow, Off Cage End Road Hatfield Broad Oak or extend the development limits to include the land. (06HBO15) (PSLP36 J Lukies) • Allocated 1.2 ha of land north of Hammonds Road Hatfield Broad Oak for 24 dwellings.(08HBO17) (PSLP2537 H Turtill) • Allocated land south of Cannons Lane Hatfield Broad Oak (NEW)(PSLP2709 Stonebond Properties • Allocate land west of Mill Lane Hatfield Heath for residential development (09HHea17) (PSLP2531 Pelham Structures) • Allocate Land at High Pastures and Land East and West of Mill Lane Hatfield Heath. (08HHea17) (09HHea17) (PSLP2577 D Sargeant) • Land north of Cornells Lane Widdington be allocated for residential development (02Wid15) (PSLP1615 Stonebond Properties) • Allocated land at Little Garnets High Easter Parish for residential development or retirement village (NEW) (PSLP3057 S Barker)
<u>13 Clavering</u>	
SUPPORT	
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Omission of land west of Clavering Primary School as development site.(07Cla15) (PSLP2527 Pelham Structures) • Insufficient housing allocated to Type A village of Clavering. (PSLP711 J Noble) (PSLP2877 EA Securities)
MODIFICATIONS REQUEST	<ul style="list-style-type: none"> • Allocate of land rear of Clavering Primary School, Stortford Road, Clavering, for residential development. .(07Cla15) (PSLP2527 Pelham Structures) • Allocate sites 04Cla15 and 05Cla15 in Clavering for residential development. (PSLP711 J Noble) • Allocate land to the west of The Cricketers (09Cla15) (PSLP2877 EA Securities)
<u>13. Clavering CLA 1 (Land south of Oxleys Close)</u>	
SUPPORT	1
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Development at the scale proposed is unlikely to have a sever affect upon the Strategic Road Network (PSLP3029 Highways England)
SUMMARY OF	<ul style="list-style-type: none"> • The site is located to the north of the Grade II listed Clavering Hall,

REPRESENTATIONS IN OBJECTION	<p>and is adjacent to Stortford Road. Stortford Road is a Roman road which increases archaeological potential. Any development of the site therefore has the potential to impact upon these heritage assets. It is important that any development of this site will need to preserve the grade II listed Clavering Hall and its setting, and consider archaeological potential. (PSLP1899 Historic England)</p> <ul style="list-style-type: none"> • Allocations could have an adverse impact on Quendon Wood SSSI through air and water quality impacts. This area is located within the Lea and Stort Valleys, a priority area for measures to connect fragmented wildlife sites, improve management of priority habitats and species while using the natural assets of the river valleys and wider landscape to help enhance the lives of local people through improved greenspace. (PSLP2469 Natural England) •
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Amend policy to to preserve the grade II listed Clavering Hall and its setting, and consider archaeological potential. (PSLP1899 Historic England) •
14. Debden DEB 1 (Land west of Thaxted Road)	
SUPPORT	1
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Development at the scale proposed is unlikely to have a sever affect upon the Strategic Road Network (PSLP3030 Highways England)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • There are a number of Grade II listed structures to the north and south of the site, these are primarily located in the settlement to the north of site. Development at the site is likely to impact upon those assets to the south, namely Miller's Farmhouse, barn at Miller's Farm, Water Hall, and Broctons Farmhouse (all Grade II listed). (PSLP1900 Historic England) • Allocations could have potential impacts to Debden Water SSSI through air and water quality impacts. (PSLP2470 Natural England) • Object to allocation – loss of agricultural land; scale; inadequate infrastructure; distant from key services; air quality impacts; flood risk; visual impact; traffic;. (PSLP1708 J Collins) (PSLP1945 I Carter)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • It is important that any development will need to preserve the listed buildings including Miller's Farmhouse, barn at Miller's Farm, Water Hall, and Broctons Farmhouse (all Grade II listed) and their settings. These requirements should be included in the policy and supporting text of the Plan. (PSLP1900 Historic England) • Delete allocation (PSLP1708 J Collins) (PSLP1945 I Carter)
15 Elsenham	
SUPPORT	
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Any development coming forward should provide either a Transport Assessment or Statement carried out in accordance with current guidance and best practice, any applicant is strongly recommended to seek guidance before undertaking the work, if a

	<p>significant impact is identified this will need to be mitigated.(PSLP3031 Highways England)</p> <ul style="list-style-type: none"> • Suitable sites not allocated (PSLP2855 Pegasus) (PSLP2854 Crown Estate) (PSLP2758 Crown Estate) • Elsenham Industrial Estate, Gaunts End is within Stansted Airport Countryside Protection Zone, and as such it should not attract further development. (PSLP281 Elsenham PC) • Development through allocations, including Policy ELS4 Elsenham Nurseries Stansted Road, could have potential impacts through air and water quality mediated effects, on Thorley Flood Pound SSSI, Debden Water SSSI, Elsenham Woods SSSI, Little Hallingbury Marsh SSSI, and Quendon Wood SSSI. This area is located within the Lea and Stort Valleys, a priority area for measures to connect fragmented wildlife sites, improve management of priority habitats and species while using the natural assets of the river valleys and wider landscape to help enhance the lives of local people through improved greenspace. (PSLP2741 Natural England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Include reference to Transport Assessment or statement in policy for sites in Elsenham. (PSLP3031 Highways England) • Allocated sites in Elsenham SLAA reference 03Els15 and 04Els15. (PSLP2855 Pegasus) • Allocate Land to the west of Station Road Elsenham for about 70 dwellings (03Els15) (PSLP2754 the Crown Estate) • Allocate Land to the north of Stansted Road for approximately 40 units.(04Els15)(PSLP2758 Crown Estate) • Make clear in policy that Elsenham Industrial Estate, Gaunts End cannot attract further development, as it is within the Stansted Airport Countryside Protection Zone. (PSLP281 Elsenham PC)
15. Elsenham ELS 1 (Land south of Rush Lane)	
SUPPORT	2
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Support allocation (PSLP2286 Rosconn Strategic Land)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Currently no mention of heritage assets in policy. There are a number of Grade II buildings in close proximity to the north and south of the proposed site, in addition the Grade I listed Church of St Mary the Virgin is located further to the east to the site. Any development of the site therefore has the potential to impact upon these heritage assets. (PSLP1902 English Heritage) • The Archaeological Assessment of allocated sites (February 2018) indicated that the site may contain archaeological deposits which will need to be considered by future development proposals, through an archaeological evaluation. (PSLP961 ECC) • Description of site inaccurate. The site is subject to a number of constraints (PRoW; access; landscape character; poor air quality; railway line; overhead power lines; flood zones; proximity to airport restricting SuDS; impact on development at Sawmill; housing capacity of Elsenham (PSLP340 ElsenhamPC) • Object to allocation as Elsenham is unsuitable for development; impact on CPZ; traffic. (PSLP2546 M Shaw)(PSLP1607 E Kay)

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MODIFICATION REQUEST	<ul style="list-style-type: none"> It is important that any development of this site will need to preserve the listed buildings and their settings. These requirements should be included in the policy and supporting text of the Plan.(PSLP1902 English Heritage) If policy not deleted that additional point “6. Housing mix is to be subject to local consultation. As a guide, it is anticipated that one-third of the dwellings will be bungalows, in order to make good the deficiency in provision for the elderly in the village.”(PSLP340 Elsenham PC) Additional point “An appropriate Archaeological Assessment will be required” (PSLP961 ECC) Delete allocation (PSLP2546 M Shaw) (PSLP1607 E Kay)(PSLP340 Elsenham PC)
15. Elsenham ELS 2 (Land west of Hall Road)	
SUPPORT	1
OBJECT	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Support allocation. (PSLP2574 Bovis Homes)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Currently no mention of heritage assets in policy. There are a number of Grade II listed buildings to the immediate north, east and west of site with the Grade I listed Church of St Mary the Virgin located further to the south east. Any development of the site therefore has the potential to impact upon these heritage assets. (PSLP1903 Historic England) Policy omits reference to existing S106 agreement referring to community facility contribution; and housing mix. (PSLP341 Elsenham PC) Object to allocation as Elsenham is unsuitable for development. (PSLP2544 M Shaw)
MODIFICATION REQUEST	<ul style="list-style-type: none"> It is important that any development of this site will need to preserve the listed buildings and their settings. These requirements should be included in the policy and supporting text of the Plan. (PSLP1903 Historic England) Description include “Hall Road to east and Stansted Brook to south” (PSLP341 Elsenham PC) Additional point s <ul style="list-style-type: none"> 6. A Community Facilities Contribution not exceeding three hundred and ten thousand pounds (£310,000) shall be made by way of part contribution towards the cost of a new Community Hall in Elsenham. 7. Housing mix is to be subject to local consultation. As a guide, it is anticipated that one-third of the dwellings will be bungalows, in order to make good the deficiency in provision for the elderly in the village. (PSLP341 Elsenham PC) Delete allocation (PSLP2544 M Shaw)
15. Elsenham ELS 3 (Land north of Leigh Drive)	
SUPPORT	0
OBJECT	1
SUMMARY OF	

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REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> The site has detailed planning permission and is under construction. (PSLP279 Elsenham PC)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Update policy. (PSLP279 PC)
15. Elsenham ELS 4 (Residential Commitments)	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Policy omits total capacity of sites. (PSLP342 Elsenham PC)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Amend the data to state the totals for each site (PSLP342 Elsenham PC)
16 Felsted	
SUPPORT	1
OBJECT	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Development at the scale proposed is unlikely to have a sever affect upon the Strategic Road Network (PSLP3032 Highways England)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Development through allocations could have potential air and/or water quality impacts on Garnetts Wood/Barnston Lays SSSI. (PSLP2472 Natural England) The plan makes insufficient provision of small to medium sites.(PSLP2873 Catesby Estates) It is a war of attrition in Felsted. Non-stop planning applications to extend the village into a conurbation with other new housing. Felsted Brook is already being destroyed by polluted runoff waste water. The village B road is already swamped with motor traffic (PSLP716 C Turvey) Omission of land west of Maranello, Watch House Green as development site (16Fel15) (PSLP1625 Landvest Development)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Allocated both land at Braintree Road and the land east of Chelmsford Road, Felsted as logical extensions to the village in sustainable locations.(13/14Fel15) (PSLP2873 Catesby Estates) Allocate land west of Maranello Watch House Green fore residential development. (16Fel15) (PSLP1625 Landvest Development)
16. Felsted FEL 1 (Land North of Station Road)	
SUPPORT	1
OBJECT	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> The site is identified in the emerging Neighbourhood Plan and therefore supported providing it is delivered in accordance with the final Neighbourhood Plan, including the identified community benefit of a Doctors' Surgery together with appropriate parking, both to be gifted to the community.(PSLP733 Felsted PC)
SUMMARY OF	<ul style="list-style-type: none"> The allocation is close to the historic core of Felsted and has the

REPRESENTATIONS IN OBJECTION	<p>potential to impact on Conservation area. The Archaeological Assessment of allocated sites (February 2018) indicated that the site may contain archaeological deposits which will need to be considered by future development proposals, through an archaeological evaluation. (PSLP962 ECC)</p> <ul style="list-style-type: none"> • Currently no mention of heritage assets in policy. The Felsted Conservation Area lies to the east of the site and includes a number of listed buildings including the grade I listed Church of the Holy Cross. Any development should protect any key views of the church. (PSLP1904 Historic England) • Object to policy due to traffic, highways danger, light pollution, aircraft noise, sewage plant. (PSLP50 R Sudlow) • Policy is supported but policy area should include open land to the north (PSLP1601 J Young)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Add additional point “An appropriate Archaeological Assessment will be required” (PSLP962 ECC) • Any development should protect any key views of the church. These requirements should be included in the policy and supporting text of the Plan.(PSLP1904 Historic England) • Delete policy (PSLP50 R Sudlow) • Inset Map should be amended to include the area of land that is proposed to be utilised as open space which lies immediately to the west and is within the same ownership.(PSLP1601 J Young)
16. Felsted FEL 2 (Land east of Braintree Road)	
SUPPORT	1
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Policy is supported (PSLP922 Springfield Planning)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Object to site as it offers no community benefit specifically for residents of Felsted. Planning permission has been refused for development of the site.(PSLP733 Felsted PC) • Currently no mention of heritage assets in policy. There are three grade II listed buildings or structure to the north and north west of the site (Weavers, Felmoor Farmhouse and a Pump. Any development of the site has the potential to impact upon the setting of these heritage assets. (PSLP1906 Historic England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Delete policy and replace with allocation of land at Sunnybrook Farm with land for parking for the school (NP reference HN2 Site A UDC SLAA ref 20Fel15) (PSLP733 Felsted PC) • Development should preserve the settings of Weavers, Felmoor Farmhouse and Pump (all listed at grade II). These requirements should be included in the policy and supporting text of the Plan. (PSLP1906 Historic England)
16. Felsted FEL 3 (Residential Commitments)	
SUPPORT	
OBJECT	
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF	

REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
17. Flich Green FLI 1 (Residential Commitments)	
SUPPORT	
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
18 Great Chesterford	
SUPPORT	
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> We would expect any development coming forward to provide either a Transport Assessment or Statement carried out in accordance with current guidance and best practice, any applicant is strongly recommended to seek guidance before undertaking the work, if a significant impact is identified this will need to be mitigated. (PSLP3034 Highways England) Development through allocations could have potential air and/or water quality impacts on Hildersham Wood SSSI. The allocation is within an area, Chalk and Chilterns, identified by Natural England as a focus for priority habitat creation and enhancement to connect fragmented chalk grassland and woodlands and benefit farmland birds. (PSLP2474 Natural England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Include reference to Transport Assessment or statement in policy for sites in Great Chesterford. (PSLP3034 Highways England)
18. Great Chesterford GtCHE 1 (Land north of Barthlomew Close)	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Currently no mention of heritage assets in policy. This site is adjacent to the Great Chesterford Conservation Area and there are a number of grade II listed buildings to the south. (PSLP1908 Historic England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Development should preserve or enhance the character or appearance of the Great Chesterford Conservation Area and preserve the settings of the nearby listed buildings. These requirements should be included in the policy and supporting text of the Plan. (PSLP1909 Historic England)
18. Great Chesterford GtCHE 2 (Residential Commitments)	
SUPPORT	
OBJECT	

SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
18 Great Chesterford GtCHE 3 (Land adjacent Community Centre)	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Have concerns of the potential impact of development on the setting of the scheduled monuments but note site now has planning permission. Welcome reference to heritage assets but minor amendment to wording needed. (PSLP1909 Historic England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Amend “ancient monument” to “Scheduled Monument “(the current term used in the NPPF). These requirements should be included in the policy and supporting text of the Plan. (PSLP1909 Historic England)
19 Great Dunmow	
SUPPORT	
OBJECT	6
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Policies omit reference and requirement to facilitate the linking of the Flitch Way for all user groups in accordance with the requirements listed in Chapter 7. (PSLP635 Flitch Way Action Group) We would expect any development coming forward to provide either a Transport Assessment or Statement carried out in accordance with current guidance and best practice, any applicant is strongly recommended to seek guidance before undertaking the work, if a significant impact is identified this will need to be mitigated. (PSLP3035 Highways England) Development through allocations could have potential air and/or water quality impacts on Garnetts Wood/Barnston Lays SSSI, High Wood Dunmow SSSI. (PSLP2475 Natural England) A number of the proposed allocated sites do not score as positively against the principles of sustainable development, particularly in comparison to our client’s site at Dunmow Park (09GtDun15); Why have policies in Neighbourhood Plan been replicated but in some cases the site capacity increased? (PSLP2695 Bovis Homes) Each of the developments within the plan together an almost doubling the size of the population of the town, bearing in mind that the planned Easton development will border Dunmow what provision is being made to secure the historic character of the town to justify both the expansion of existing communities and the

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	creation of the new Garden communities which does not seem to be justified within the same local area, straining resources, infrastructure and facilities. (PSLP31 C Fantides)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Include reference to Transport Assessment or statement in policy for sites in Great Dunmow. (PSLP3035 Highways England) • Allocate Dunmow Park for residential development of 120 dwellings.(09GtDun15) (PSLP2695 Bovis Homes)
19. Great Dunmow GtDUN 1 (Land west and south west of Great Dunmow)	
SUPPORT	1
OBJECT	10
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • The proposal in criterion (2) is welcomed as this is necessary to ensure the delivery of replacement playing fields for Helena Romanes School (PSLP70 Sport England)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Object to policy – insufficient infrastructure and consideration of impact on quality of life of existing community. As provision of secondary school is no longer being provided as originally offered this site should no longer be considered viable (PSLP202/752 A Farrell) • No reference is made to the Flitch way being accessible to all users including equestrians; and policy omits requirement on developer to facilitate linking of the Flitch Way around Great Dunmow for all users in accordance with the requirements listed in Chapter 7. This link is fully supported by the Highways Authority and forms part of the Rights of Way Improvement Plan and therefore its omission should be rectified. (PSLP407 Essex Bridleway Association) (PSLP630 Flitch Way Action Group) (PSLP804 British Horse Society) • In the event of further delays to Smith's Farm and/or Woodside Way, part of the land for education use may be required for a primary school. (PSLP968 ECC) • Bullet point 1- The use of 'enabling development' in the policy could be confused with the references in the NPPF to development required to secure the future conservation of heritage assets (old NPPF, paras 55 and 140/para 79b and 202 of the new NPPF). We welcome reference to Flitch Way and appropriate buffers in the policy;to the grade II listed buildings in bullet point 11 (PSLP1913 Historic England) • Local Plan policy concerning the subject site should be consistent with the GDNP, key difference relate to capacity and land the school. Policy should be flexible to enable the land and financial contributions to be used for education purposes rather than specifically for a new secondary school. (PSLP2554 Kier Living) (PSLP2556 Siemens Benefit Scheme)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • A requirement is embedded within each of the Development Policies for the land allocations where this link will run that a S106 agreement is imposed on the developer for a fully-funded multi-user route across all relevant sites, to ensure the Flitch Way is completed without delay. Where connectivity of these sites to the Flitch Way link is an issue, S106 funding should also be sought to enhance this connectivity to ensure the multi-user path is readily accessible to as many users as possible. It also follows that any

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	<p>new links with the Flitch Way within any new development adjoining it should be accessible to all users - pedestrians, cyclists and equestrians. (PSLP407 Essex Bridleway Association) (PSLP630 Flitch Way Action Group) (PSLP804 British Horse Society)</p> <ul style="list-style-type: none"> • Delete references to "new secondary school" and replace with "schools provision". (PSLP968 ECC) • Bullet point 1 - delete 'an enabling development'. We recommend the policy is amended appropriately to meet the circumstances of this proposal. Amend bullet point 11 to state, 'Preserve the grade II listed Folly Farm, Highwood Farm and Round house and their settings by ensuring a buffer zone separates this collection of buildings from new development. (PSLP1913 Historic England) • Policy should be adjusted to refer to a "minimum of 400 dwellings" and "The development will provide land and financial contributions for education development purposes" (PSLP2554 Kier Living) (PSLP2556 Siemans Benefit Scheme)
<u>19 Great Dunmow GtDUN 2 (Land at Helena Romanes School)</u>	
SUPPORT	1
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • The requirement in criterion (2) for no loss of sports provision until new playing fields of at least equivalent quantity/quality are available for community use is welcomed. The requirement for the Great Dunmow Leisure Centre to remain operational throughout the development of the site is also welcomed. These requirements should help ensure that the development of the site would accord with Government policy in paragraph 97 of the NPPF (2018) and policy INF2 of the local plan. (PSLP71 Sport England)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • It would be helpful to list the listed buildings (PSLP1916 Historic England) • Policy requirements 2 is unjustified by the evidence and requirements 7,8,9, and 10 are unnecessary as repeating development management processes. (PSLP2791 Helena Romanes School)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • List the listed buildings and amendment wording to preserve the setting of the listed buildings and to preserve or enhance the character or appearance of the conservation area and its setting. (PSLP1916 Historic England) • Delete requirements 2, 7, 8, 9 and 10.
<u>19. Great Dunmow GtDUN 3 (Woodfield, Woodside Way)</u>	
SUPPORT	0
OBJECT	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • The Archaeological Assessment of allocated sites (February 2018) indicated that the site may contain archaeological deposits which will need to be considered by future development proposals, through an archaeological evaluation. (PSLP973 ECC) • Currently no mention of heritage assets in policy. The site lies to the north of Stortford Road which, as a Roman Road, may have archaeological potential. (PSLP1920 Historic England)

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	<ul style="list-style-type: none"> Requirement 2 is unnecessary as it duplicates development management processes (PSLP1568 C Trembath)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Add an additional numbered bullet to read: An appropriate Archaeological Assessment will be required Supporting text and policy to identify that as the site lies to the north of Stortford Road, as a Roman Road, may have archaeological potential (PSLP1920 Historic England) Amend point 2 "It provides for open space within the development including informal recreation areas, and the provision of children's play spaces (LEAPs and NEAPs); The application should be accompanied by a Transport Assessment, flood Risk Assessment, Approved Drainage Strategy and other required document and any recommended improvements/remedial works will be controlled through the legal obligation:" (PSLP1568 C Trembath)
19. Great Dunmow GtDUN 4 (Land south of B1256 (Stortford Road and West of Buttleys Lane))	
SUPPORT	0
OBJECT	5
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> The Archaeological Assessment of allocated sites (February 2018) indicated that the site may contain archaeological deposits which will need to be considered by future development proposals, through an archaeological evaluation. (PSLP973 ECC) Object to policy as contrary to Neighbourhood Plan. (PSLP980 Great Dunmow TC) Welcome reference in bullet point 4 to listed buildings. Suggest minor wording changes. The site lies to the north of Stortford Road which, as a Roman Road, may have archaeological potential (PSLP1922 English Heritage) Object to policy as site not allocated in Neighbourhood Plan, lead to coalescence of Great Dunmow and Easton Park GC; delivery will be more long term as should await development of site to east.(PSLP2694 Bovis Homes) Support principle of policy but object to the scoring of certain aspects of the site's credentials in the Sustainability Appraisal accompanying the Plan (PSLP2874 Linden Homes)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Add an additional numbered bullet to read: An appropriate Archaeological Assessment will be required (PSLP973 ECC) Delete policy (PSLP980 Great Dunmow TC) Change the word protecting to preserving in line with the legislation. Supporting text and policy to identify that as the site lies to the north of Stortford Road, as a Roman Road, may have archaeological potential. (PSLP1922 English Heritage) The sustainability conclusions in the Sustainability Appraisal should be amended to take account of the proportionate evidence submitted with these representations in the interest of drawing justified conclusions. (PSLP2874 Linden Homes)
19. Great Dunmow GtDUN 5 (Oaklands, Ongar Road)	
SUPPORT	0

OBJECT	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • This development makes no proper provision for safe off road multi user tracks. There is an opportunity to provide a much needed off road link with the adjoining development at Ongar Road South and a safe Pegasus crossing suitable for all non motorised users across Ongar Road to link up with the development on Ongar Road North connecting to the new bridleway which will link up the severed sections of the Flitch Way. Long term if the new secondary school is constructed such a route will be a vital link for students wishing to walk and cycle to school in safety. (PSLP631 Flitch Way Action Group) • The Archaeological Assessment of allocated sites (February 2018) indicated that the site may contain archaeological deposits which will need to be considered by future development proposals, through an archaeological evaluation. (PSLP975 ECC) • Currently no mention of heritage assets in policy. There are three Grade II listed buildings to east of the site and the Clapton Hall moated site and fishpond scheduled monument to the south east of the site. Any development of the site has the potential to impact upon these heritage assets. (PSLP1923 Historic England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Development should include an off road safe multi user track and a Pegasus crossing to facilitate use by walkers, cyclists and equestrians. The developer should be required to enter into a s106 Agreement requiring the developer to contribute to the costs of creating the Flitch Way link route both within and outside the development. (PSLP631 Flitch Way Action Group) • Add an additional numbered bullet to read: An appropriate Archaeological Assessment will be required (PSLP975 ECC) • Policy and supporting text to include reference to preserving the listed buildings and their settings and protect the scheduled monument and its setting.(PSLP1923 Historic England)
<u>19. Great Dunmow GtDUN 6 (14 Stortford Road, Perkins Garage Site)</u>	
SUPPORT	0
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Currently no mention of heritage assets in policy. The site is located in the Great Dunmow Conservation Area and there are a number of grade II listed buildings nearby. This is an opportunity to enhance the conservation area through sensitive, high quality design. (PSLP1926 Historic England) • Policy makes reference that a previous application for the site has expired, and therefore it is unclear whether this site can come forward as expected. (PSLP2693 Bovis Homes)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Policy should include reference to the conservation area, listed buildings and opportunities to enhance the area. (PSLP1926 Historic England)

<u>19. Great Dunmow GtDUN 7 (Land east of St Edmunds Lane)</u>	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Currently no mention of heritage assets in policy. Grade II listed Tower House lies to the north of the site. Notwithstanding some new intervening residential development between the site and the heritage asset the policy should reference the asset (PSLP1929 Historic England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> The policy should reference the preservation of the grade II Tower House and its setting. (PSLP1929 Historic England)
<u>19. Great Dunmow GtDUN 8 (Land west of Chelmsford Road)</u>	
SUPPORT	0
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Policies omit reference and requirement to facilitate the linking of the Flitch Way for all user groups in accordance with the requirements listed in Chapter 7 (PSLP408 Essex Bridleway Association) (PSLP632 Flitch Way Action Group) (PSLP806 British Horse Society) Currently no mention of heritage assets in policy. The grade II listed Crofters and a Barn lie to the west of the site and to the north west lies a grade II listed gatehouse.(PSLP1931 Historic England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> A requirement that Policy for the land allocation where this link will run that a S106 agreement is imposed on the developer for a fully-funded multi-user route across all relevant sites, to ensure the Flitch Way is completed without delay. Where connectivity of these sites to the Flitch Way link is an issue, S106 funding should also be sought to enhance this connectivity to ensure the multi-user path is readily accessible to as many users as possible. It also follows that any new links with the Flitch Way within any new development adjoining it should be accessible to all users - pedestrians, cyclists and equestrians. Policy should require development to preserve the nearby listed buildings and their settings. (PSLP1931 Historic England)
<u>19. Great Dunmow GtDUN 9 (Land west of Woodside Way)</u>	
SUPPORT	0
OBJECT	9
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Object to policy because of lack of infrastructure being provided on site (PSLP204 / PSLP753 A Farrell) Bridleways already in existence in this parcel of land and these should be retained and should form the basis of a wider network of multi-user paths accessible to all users, including equestrians.

	<p>his parcel of land also has the potential to link this bridleway to the Flitch Way if a new route can be established to run east on the south side of the development to enable a direct crossing onto Buttleys Lane, leading to the Flitch Way. (PSLP409 Essex Bridleway Association) (PSLP634 Flitch Way Action Group) (PSLP808 British Horse Society)</p> <ul style="list-style-type: none"> • The Archaeological Assessment of allocated sites (February 2018) indicated that the site may contain archaeological deposits which will need to be considered by future development proposals, through an archaeological evaluation.(PSLP977 ECC) • Currently no mention of heritage assets in policy. There are a number of grade II listed assets to the south and south east of the site including Folly Farmhouse, (and outbuildings, barn and granary) and Highwood House. (PSLP1935 Historic England) • Policy broadly supported but object to requirement 4 as outline planning permission has been granted and this was supported by an Environmental Statement which included a Landscape and Visual Character Assessment. (PSLP2661 Savills) • Allocation directly abuts the boundary of High Wood Dunmow hence potential for direct and indirect impacts must be assessed and mitigated. (PSLP2476 Natural England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Policy is amended to include the enhancement of the network of multi-user routes accessible to all vulnerable road users including equestrians, rather than the default option which tends to only cater for pedestrians and cyclists. (PSLP409 Essex Bridleway Association) (PSLP634 Flitch Way Action Group) (PSLP808 British Horse Society) • Add an additional numbered bullet to read: An appropriate Archaeological Assessment will be required as • Policy should require development to preserve the nearby listed buildings and their settings. (PSLP1935 Historic England) • Policy reworded to require that reserved matters submissions take account of the Landscape and Visual Character Assessment.(PSLP2661 Savills)
<u>19. Great Dunmow GtDUN 10 (Residential Commitments)</u>	
SUPPORT	0
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Uttlesford is concentrating an unrealistic number of new homes in Great Dunmow. Well over 1000 when the houses planned south of Stortford Road are considered. A small market town. Parking is already an issue. The supermarkets are not sufficient to cope and shopping can be a disappointing ordeal. (PSLP19 C Woodhead) • Policy omits reference to S106 funding for Flitch Way link route as part of development of sites north and south of Ongar Road. (PSLP410 Essex Bridleway Association) (PSLP633 Flitch Way Action Group) (PSLP810 British Horse Society)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Stop the continued development once Woodside is completed. Leave the area to the South of Stortford Road for another

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	<p>generation at least. (PSLP19 C Woodhead)</p> <ul style="list-style-type: none"> Policy is amended to include the requirement to provide the sections of the Flitch Way route, and the enhancement of the connectivity between developments north and south of Ongar Road accessible to all vulnerable road users including equestrians, together with the provision of a multi-user crossing on the B184. (PSLP410 Essex Bridleway Association) (PSLP633 Flitch Way Action Group) (PSLP810 British Horse Society)
19. Great Dunmow GtDUN 11 (Development Opportunity Sites)	
SUPPORT	1
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> We welcome the reference in the policy to the Conservation Area and Listed Buildings. (PSLP1937 Historic England)
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
20. Great Easton GtEAS 1 (Land of Brocks Mead)	
SUPPORT	0
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Object to policy as site has no access, greenfield site with significant slope, contribute to flooding, increase in traffic, lack of and distance from services and facilities, remainder of field made unusable apart from further housing.. (PSLP174 P Hurrell) The site is located in close proximity to a Scheduled Site, and will require consultation with Historic England regarding the impact on the setting of the listed building and monument. The Archaeological Assessment of allocated sites (February 2018) indicated that the site may contain archaeological deposits which will need to be considered by future development proposals, through an archaeological evaluation. (PSLP964 ECC) We welcome the reference in the policy to the conservation area, church, listed buildings and scheduled monument. (PSLP1938 Historic England) The allocation boundary unnecessarily constrains the development potential and sustainability of the site.(PSLP1556 C Trembath)
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	<ul style="list-style-type: none"> Delete policy (PSLP174 P Hurrell) Add an additional numbered bullet to read: An appropriate Archaeological Assessment will be required The policy should also state that the development should conserve and enhance heritage assets and their settings.(PSLP1938 Historic England) Amend policy to refer to quantum of development of 26 dwellings, an area of 1.4 hectares; replace requirement 4 with "A landscape buffer should be incorporated along the eastern edge of the development, incorporating a pedestrian link to Great Easton Footpath 19 which connects to the village centre." Delete

	requirement 5. (PSLP1556 C Trembath)
21. High Roding HROD 1 (Residential Commitments)	
SUPPORT	
OBJECT	
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
22. Little Canfield LtCAN 1 (Land to the south of B1256 Little Canfield)	
SUPPORT	0
OBJECT	14
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • We would expect any development coming forward to provide either a Transport Assessment or Statement carried out in accordance with current guidance and best practice, any applicant is strongly recommended to seek guidance before undertaking the work, if a significant impact is identified this will need to be mitigated. (PSLP3037 Highways England) • Object to policy as planning permission has been refused; location of the site is not suitable. (PSLP988 Great Dunmow TC) (individuals) • Object to policy limiting the employment uses that can take place on the site. (PSLP1557 C Trembath) • We welcome reference in the policy to listed buildings and Fritch Way. However the policy should also state that development should preserve the listed buildings and their settings. Where is the map for this site? (PSLP1939)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Include reference to Transport Assessment or statement in policy(PSLP3037 Highways England) • Delete policy (PSLP988 Great Dunmow TC) (individuals) • Amend policy with additional text to include <u>General Industrial and Storage and Distribution</u> uses (Use classes B1, B2 and B8); delete Criteria 2 and 3. (PSLP1557 C Trembath) • Policy should also state that development should preserve the listed buildings and their settings.(PSLP1939 Historic England) • Delete policy and replace with policy allocating 'Land East of B1256, Great Dunmow' as proposed 8.6 ha employment site. (PSLP2548 Wolfe)
23. Little Chesterford LtCHE 1 (Chesterford Research Park)	
SUPPORT	2
OBJECT	8
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Policy is supported (PSLP976 Grosvenor) (PSLP2034 Aviva)
SUMMARY OF	<ul style="list-style-type: none"> • Object to policy as development is unnecessary, cannot be

REPRESENTATIONS IN OBJECTION	<p>sustained, burden on surrounding infrastructure, detrimental impact of additional traffic, greenfield development. The District Council has a conflict of interest (PSLP2342 Little Chesterford PC) (individuals)</p> <ul style="list-style-type: none"> • There is a scheduled monument, a moated site in Paddock Wood, to the north of the site. Development will need to protect the scheduled monument and its setting. Where is the map for this site? (PSLP1942 Historic England) • National Grid prefers that buildings are not built directly beneath its overhead lines. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. (PSLP2400 National Grid) • Any development coming forward to provide either a Transport Assessment or Statement carried out in accordance with current guidance and best practice, any applicant is strongly recommended to seek guidance before undertaking the work, if a significant impact is identified this will need to be mitigated.(PSLP3038 Highways England) • Development must be kept as far as possible from ancient woodland, with a buffer area maintained between the ancient woodland and any development boundary. (PSLP816 Woodland Trust)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Policy to refer to protection of scheduled monument and its setting. (PSLP1942 Historic England) • Include reference to Transport Assessment or statement in policy(PSLP3038 Highways England) • Deletion of the site allocation or inclusion of an appropriate area of buffering (PSLP816 Woodland Trust)
24. Little Dunmow LtDUN 1 (Residential Commitments)	
SUPPORT	
OBJECT	
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
25. Little Hallingbury LtHAL 1 (Residential Commitments)	
SUPPORT	1
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Development at the scale proposed is unlikely to have a sever affect upon the Strategic Road Network (PSLP3040 Highways England)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Object to land north of Rose Cottage, Latchmore Bank, Little Hallingbury not being included within the village boundary. (PSLP2927 D Howard)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Include site within development limits.
26 Newport	
SUPPORT	1
OBJECT	4

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SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Development at the scale proposed is unlikely to have a sever affect upon the Strategic Road Network(PSLP3041 Highways England)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Object to omission of land to the south of Wicken Road, Newport (04New15)(PSLP2786 Countryside Properties) Object to omission of land west of School Lane (05New15) Object to omission of Land east of Newport, south of Debden Road (NEW) (PSLP2884 Taylor Wimpey) Object to omission of land at Bury Water Lane Newport (07New15) (PSLP1593 Sir Arthur Ellis Trust) Development through allocations could have potential air and/or water quality impacts on Quendon Wood SSSI, Debden Water SSSI. (PSLP2477 Natural England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Allocate 10.11 ha of land south of Wicken road for 150 dwellings (04New15) (PSLP2786 Countryside Properties) Allocate land west of School Lane for 90 dwellings (15New15) (PSLP679 D Hill) Allocated 8 ha of land east of Newport, south of Debden Road for 200 dwellings (NEW) (PSLP2884 Taylor Wimpey) Allocate land at Bury Water Lane for residential development (07New15) (PSLP1593 Sir Arthur Ellis Trust)
26. Newport NEWP1 (Land west of London Road)	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Welcome reference to the Conservation Area. The policy should also mention the nearby grade II listed buildings, Rose Cottage and Granta (PSLP1949 Historic England).
MODIFICATION REQUEST	<ul style="list-style-type: none"> Policy to state that development should preserve or enhance the character or appearance of the conservation area and its setting and preserve the listed buildings and their settings.(PSLP1949 Historic England)
26. Newport NEWP2 (Land at Bricketts, London Road)	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Support allocation of site but object to omission of land to the south (03New15)(PSLP2434 M Flood)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Policy NEWP 2 is amended to reflect a quantum of development of approximately 24 dwellings, and a site area of 1 hectare. (03New15)(PSLP2434 M Flood)
26. Newport NEWP3 (Land at Holmewood, Whiteditch Lane)	
SUPPORT	0
OBJECT	2
SUMMARY OF REPRESENTATIONS IN	

SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> The Archaeological Assessment of allocated sites (February 2018) indicated that the site may contain archaeological deposits which will need to be considered by future development proposals, through an archaeological evaluation. (PSLP979 ECC) Currently no mention of heritage assets in policy. Shortgrove Hall RPG (grade II) lies to the west of the site.(PSLP1951 Historic England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Add an additional numbered bullet to read: "An appropriate Archaeological Assessment will be required (PSLP979 ECC) The policy should state that, 'Development should protect the Shortgrove Hall Registered Park and Garden (grade II) and its setting.' (PSLP1951 Historic England)
26. Newport NEWP4 (Land at Bury Water Lane)	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATION IN OBJECTION	<ul style="list-style-type: none"> Currently no mention of heritage assets in policy. The Newport Conservation Area is located to the east of the site; development at the proposed site could also have the potential to impact upon the setting of the Grade I listed Church of St Mary the Virgin. (PSLP 1952 Historic England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> The policy should state that Development should conserve and where appropriate enhance heritage assets and their settings including the grade I listed Church of St Mary and the Newport Conservation Area. (PSLP1952 Historic England)
26. Newport Policy 1 Residential Commitments.	
SUPPORT	
OBJECT	
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
26. Newport NEWP5 (Land at adjacent to Newport Primary School)	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Currently no mention of heritage assets in policy. The Newport Conservation Area, that includes a number of listed buildings, lies to the south of the site.(PSLP1953 Historic England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> The policy should state that Development should conserve and where appropriate enhance heritage assets and their settings including the listed buildings and the Newport Conservation Area. .(PSLP1953 Historic England)

27. Quendon and Rickling	
SUPPORT	1
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Development at the scale proposed is unlikely to have a severe affect upon the Strategic road network (PSLP3042 Highways England) Development through allocations could have potential air and/or water quality impacts on Quendon Wood SSSI, Debden Water SSSI. (PSLP2478 Natural England)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Not enough consideration is given to the local infrastructure and local amenities.(PSLP J McSweeney)
MODIFICATION REQUEST	
27. Quendon and Rickling QUE 1 (Land East of Foxley House)	
SUPPORT	1
OBJECT	6
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Object to policy – density is too high, impact on local infrastructure, nature conservation, visual amenity; and poor highway access (individuals) We welcome the reference to the Conservation Area and listed buildings in the policy. Minor amendment to wording suggested (PSLP1954 Historic England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Policy should include a bullet point to read, 'Development should conserve and where appropriate enhance heritage assets and their settings including the listed buildings and Quendon and Rickling Conservation Area. (PSLP1954 Historic England)
27. Quendon and Rickling QUE 2 Residential Commitments	
SUPPORT	0
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Object to policy - highway safety and local infrastructure. (individuals)
MODIFICATION REQUEST	
28. Radwinter	
SUPPORT	
OBJECT	
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
29 Saffron Walden	
SUPPORT	1

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OBJECT	5
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Development at the scale proposed is unlikely to have a sever affect upon the Strategic Road Network (PSLP2044 Highways England)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> There is inconsistency in the conditions attached to the proposed development sites, with some referencing the AQMA and some not. All sites in Saffron Walden have an impact on the AQMA. (PSLP2374 Saffron Walden TC) (PSLP2972 Saffron Walden and Little Walden Neighbourhood Plan Group) Concerned about future development of the former Friends School (Walden School) site and the potential loss of the woodland tranche adjacent to the playing fields impact wildlife, flooding and loss of open space. (PSLP1757 B Tournier) There is a need for more infrastructure If housing is added in Saffron Walden area (as it definitely needs to be) It is imperative that additional means are provided to allow traffic to get around from West to East and to get to supermarkets, industry (jobs) and hospital etc. as there is no alternative route and existing roads are not coping at peak times. (PSLP2321 I Norman) Development through allocations could have potential air and/or water quality impacts on Nunn Wood SSSI, Hales & Shadwell Woods SSSI, Ashden Meadows SSSI and Debden Water SSSI.(PSLP2479 Natural England) Object to omission of 25.7 ha land at Shire Hill Farm for 450 homes. (11Saf15)(PSLP2666 Landowners) Object to allocation of Pulse Packaging Radwinter Road as an employment site. (20Saf17) (PSLP3058 The Joint Administrators of Pulse Packaging)
MODIFICATION REQUEST	<ul style="list-style-type: none"> All policies must have as a planning condition that an Air Quality Assessment will be required to demonstrate that the development would not have an impact on the Saffron Walden AQMA. (PSLP2374 Saffron Walden TC) (PSLP2972 Saffron Walden and Little Walden Neighbourhood Plan Group) Policy on relief road or simple bypass around Saffron Walden. (PSLP2321 I Norman) Allocate 25.7 ha land at Shire Hill Farm for 450 homes.(11Saf15) (PSLP2666 Landowners). The Saffron Walden Inset Map should be amended to remove the employment allocation from the site. The site should be included within the list of sites, within Chapter 29 (20Saf17) (PSLP3058 The Joint Administrators of Pulse Packaging)
29. Saffron Walden SAF 1 (Land North of Thaxted Road)	
SUPPORT	0
OBJECT	11
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF	<ul style="list-style-type: none"> The 5% dwellings for older people does not take into account the

<p>REPRESENTATIONS IN OBJECTION</p>	<p>growing need for older persons housing. The amount of homes for older persons must not be reduced. There are no provisions or review of surface water runoff. (PSLP732 D Morris)</p> <ul style="list-style-type: none"> • Object to policy on grounds previously dismissed on appeal, of traffic congestion, air pollution, loss of arable land, lack of justification to build homes young people cannot afford. (individuals) (PSLP2272 Residents for Uttlesford) (PSLP2600 Residents for Uttlesford) • Site has previously dismissed on appeal on grounds including traffic congestion. ECC has made it clear that 150 homes is the upper limit for further development in the east of the town. Since that point 85 homes and 42 units in a retirement village have been granted planning permission. This leaves a net of 23 homes. (PSLP2373 Saffron Walden TC) (PSLP2971 Saffron Walden and Little Walden Neighbourhood Plan Group) • The Archaeological Assessment of allocated sites (February 2018) indicated that the site may contain archaeological deposits which will need to be considered by future development proposals, through an archaeological evaluation. (PSLP981 ECC) • Support policy. Minor wording amendments suggested (PSLP2841 Kier Living)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Need for a traffic assessment and air quality assessment covering all of the principle junctions in Saffron Walden before any new development can be assessed as being sustainable or not. (PSLP2373 Saffron Walden TC) (PSLP2971 Saffron Walden and Little Walden Neighbourhood Plan Group) • Add an additional numbered bullet to read: An appropriate Archaeological Assessment will be required (PSLP981 ECC) • Delete policy • Amend policy title to 'Land <u>east</u> of Thaxted Road'. Paragraph 4 be amended to read "An Air Quality Assessment will be required to demonstrate the development will have no significant impact on the Saffron Walden AQMA. The Air Quality Assessment will also need to demonstrate that if there is a potential significant impact on the AQMA, suitable mitigation measures are put in place" Paragraph 6 should be rewritten to read "appropriate ecological surveys will be required". paragraph 11 of the policy be rewritten to read "<i>the masterplan needs to make provision for a road that would be capable of delivering the southern section of the link road that would run from Thaxted Road to Radwinter Road</i>". Amend Site Description to read "..... <i>the site is bounded by residential development to the north and south and a leisure centre to the west</i>". Constraints section amended to read "Constraints : Impact on the Saffron Walden AQMA – An Air Quality Assessment will be required to accompany any application to demonstrate the development of this side will have no significant impact on the Saffron Walden AQMA. Guidance provided by the Institute of Air Quality Management could be used for the definition of 'significant'."

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	Site Description paragraph be amended to read “The application will be need to be accompanied by a Transport Assessment to demonstrate that the residual impact of the development upon the highway network is not severe”
29. Saffron Walden SAF 2 (Land East of Little Walden Road)	
SUPPORT	
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Currently no mention of heritage assets in policy. Cinder Hall grade II listed building lies to the north of the site. Development should preserve the Cinder Hall (grade II listed) and its setting.
MODIFICATION REQUEST	<ul style="list-style-type: none"> Additional bullet point in the policy preserving the Cinder Hall (grade II listed) and its setting (PSLP1956 Historic England)
29. Saffron Walden SAF 3 (Land North at Viceroy Coaches to rear of 10-12 Bridge Street)	
SUPPORT	0
OBJECT	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> The Archaeological Assessment of allocated sites (February 2018) indicated that the site may contain archaeological deposits which will need to be considered by future development proposals, through an archaeological evaluation.(PSLP982 ECC) We welcome the reference to the Conservation Area and listed buildings in the policy. Ideally the policy should include additional bullet point. (PSLP1957 Historic England) Reference should be made to listed building on site. (PSLP2274 We Are Residents.org)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Add an additional numbered bullet to read: “An appropriate Archaeological Assessment will be required. (PSLP982 ECC) Include a bullet point to read, 'Development should conserve and where appropriate enhance heritage assets and their settings including the listed building on site (12 Bridge Street), numerous listed buildings nearby and Saffron Walden Conservation Area. (PSLP1957 Historic England) Add the following text “The Grade 2 listed building on this site will be protected.” (PSLP2274 We Are Residents.org)
29. Saffron Walden SAF 4 (Jossaumes, Thaxted Road)	
SUPPORT	0
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> We welcome the reference to the listed buildings in the policy. The Saffron Walden Conservation Area lies to the north of the site. Ideally the policy should include additional bullet. (PSLP1958 Historic England) Reference should be made to retention of gas works building.

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	(PSLP2275 WeAreResidents.org)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Include a bullet point to read, 'Development should conserve and where appropriate enhance heritage assets and their settings including the listed buildings on site (12 Bridge Street), numerous listed buildings nearby and Saffron Walden Conservation Area. (PSLP1958 Historic England). • Add the following "The main gasworks building should be retained and built in to the development." (PSLP2275 We Are Residents.org)
29. Saffron Walden SAF 5 (Land at De Vigier Avenue)	
SUPPORT	1
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Policy supported (PSLP813 Carter Jonas)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Site is unsustainable location on a site which currently provides significant natural benefits in an area largely devoid of them.(PSLP2273 WeAreResidents.org)
MODIFICATION REQUEST	
29. Saffron Walden SAF 6 (Land south of Tiptofts, Thaxted Road)	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
29. Saffron Walden SAF 7 (Land West of Lime Avenue)	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Currently no mention of heritage assets in policy. There are a number of designated heritage assets in close proximity to the site. These include the Saffron Walden Conservation Area located to the south of the site with the Grade II* listed Bridge End Registered Park and Garden to the south west of the site. There are also a number of Grade II listed buildings to the south. (PSLP1959 Historic England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • The policy should include a bullet point to read, 'Development should conserve and where appropriate enhance heritage assets and their settings including the Saffron Walden Conservation Area, Bridge End Gardens (RPG, grade II) and several grade II listed buildings to the south of the site. (PSLP1959 Historic England)
29. Saffron Walden SAF 8 (Land south of Radwinter Road)	
SUPPORT	0
OBJECT	1
SUMMARY OF	

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REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Although supporting the policy in principle there are concerns in respect of the specific wording of the draft allocation which does not currently provide sufficient flexibility to enable sustainable development can be delivered on site. (PSLP2660 Manor Oak Homes)
MODIFICATION REQUEST	<ul style="list-style-type: none"> The opening paragraph of the policy should read: “Land South of Radwinter Road, Saffron Walden is shown on the Policies Map, is allocated for development at a <u>minimum</u> of 200 dwellings, <u>and 42</u> extra care dwellings, 0.5ha for employment (B1 offices) <u>or a minimum 40 dwellings on the extra care and employment sites,..”</u> (PSLP2660 Manor Oak Homes)
29. Saffron Walden SAF 9 (Land rear of The Kilns, Thaxted Road)	
SUPPORT	0
OBJECT	9
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
29. Saffron Walden SAF 10 (Residential Commitments)	
SUPPORT	
OBJECT	
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
29. Saffron Walden SAF 11 (Land north of Ashdon Road)	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> The marketing of the site is on-gong but it has already been established that there is no reasonable prospect of all of the remaining undeveloped commercial land at Ashdon Road being brought forward for commercial use. With the Ridgeons plot already having being delivered (phase 1a), it is considered correct to retain this parcel of land and the plot of the employment land which sits in front of the Ridgeons store (phase 1d) for employment use. On the basis that market demand simply does not exist for the consented commercial phases of development located further into the site (phases 3 and 5), it is proposed that these land parcels be released for housing. (PSLP814 Carter Jonas)

MODIFICATION REQUEST	<ul style="list-style-type: none"> Amend the Policies Map for Saffron Walden to identify only Phases 1a and 1d, as being an “Existing Employment site” <p>Policy SAF 11 should also be amended to provide policy protection for the following commercial uses:</p> <ul style="list-style-type: none"> 1.8ha of land for use as Builder’s Merchant providing 5,939m2 of floor space – Phase 1a 0.76ha of land providing 3,650m2 of B1 or B2 floor space – Phase 1d (PSLP814 Carter Jonas)
29. Saffron Walden SAF 12 (Land south of Ashdon Road)	
SUPPORT	
OBJECT	
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
29. Saffron Walden SAF 13 (Land at Thaxted Road)	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Allocation should be expanded to allow for other Main Town Centre Uses, which would include the provision of additional hotel accommodation. (PSLP2662 Granite Property)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Amend policy to read: "The Council will support the development of land at Thaxted Road, Saffron Walden, as shown on the Policies map, for mixed uses which could include retail, retail warehousing, leisure uses <u>and other main town centre uses, subject to compliance with the NPPF sequential and impact tests where necessary.</u>" Delete remainder of the policy (PSLP2662 Granite Property)
29. Saffron Walden SAF 14 (Development Opportunity Sites)	
SUPPORT	1
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> We welcome the reference to the Conservation Area and listed buildings in the policy. (PSLP1961 Historic England)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> The Archaeological Assessment of allocated sites (February 2018) indicated that the site may contain archaeological deposits which will need to be considered by future development proposals, through an archaeological evaluation. (PSLP984 ECC) Reference should be made to maintaining the ground floors for retail and commercial use. (PSLP2272 WeAreResidents.org)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Add the following wording to the second paragraph below the numbered (1-3): An appropriate Archaeological Assessment will be required. (PSLP984 ECC) Add the following “The ground floors of development on this site

	should be maintained for retail and commercial use.” (PSLP2272 WeAreResidents.org)
29. Saffron Walden SAF 15 (Saffron Walden Community Hospital)	
SUPPORT	0
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATION IN OBJECTION	<ul style="list-style-type: none"> • A new surgery at the hospital site (and opposite Tesco, which has a regular bus service) would be sensible. The two existing surgeries in the town are overcrowded and no longer fit for purpose. They also have inadequate car parking. (PSLP704 Cllr R Freeman) • . Currently no mention of heritage assets in policy. There is a grade II listed building on the site. (PSLP1963 Historic England) • Saffron Walden Community Hospital is set out as a potential site for development. This is despite that fact that the doctors’ surgeries in Saffron are over-subscribed (according to the NHS’s responses given to planning applications), and that the population is growing and could benefit from additional healthcare services, not less. (PSLP2375 Saffron Walden Town Council) (PSLP2968 Saffron Walden and Little Walden Neighbourhood Plan Group)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Reserve site for a health centre(PSLP704 R Freeman) • The policy should include a bullet point to read, Development should preserve the grade II listed Community Hospital building and its setting. (PSLP1963 Historic England) • The site should be protected from development for any use other than healthcare provision unless and until alternative provision in Saffron Walden has been made in the Plan.(PSLP2375 Saffron Walden Town Council)
30. Stansted Airport SA 1 (North Stansted Employment Area)	
SUPPORT	0
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • We would expect any development coming forward to provide either a Transport Assessment or Statement carried out in accordance with current guidance and best practice, any applicant is strongly recommended to seek guidance before undertaking the work, if a significant impact is identified this will need to be mitigated. (PSLP3045 Highways England) • We welcome the reference to listed buildings and archaeology in the policy, although ideally this would be included as a bullet point rather than a constraint. (PSLP1964 Historic England) • Object to restriction of strategic warehousing contrary to Employment Land Review 2017. (PSLP1525 Manchester Airport Group) • Object to policy permitting non--airport related uses on 55 hectares in the North Stansted Employment Area; this site should be retained for airport uses only and alternative sites within the

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	vicinity of the airport should be allocated. We believe that this strategy is based on a fundamental misunderstanding of the evidence base. (PSLP943 WRC Morton Trust)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Include reference to Transport Assessment or statement in policy(PSLP3045 Highways England) • Make reference to listed buildings and archaeology a bullet point rather than a constraint. (PSLP1964 Historic England) • Amend policy: - Main Paragraph: the words 'non-strategic' should be removed. Point 1: 'residential and community interests' should be replaced by 'residential amenity'. Point 4: This should be deleted, removing the definitive requirement for a masterplan and legal obligation controls. (PSLP1525 Manchester Airport Group) • Policy be amended to release 18 hectares of land. (PSLP943 WRC Morton Trust)
31 Stansted Mountfitchet	
Support	0
Object	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Expect any development coming forward to provide either a Transport Assessment or Statement carried out in accordance with current guidance and best practice, any applicant is strongly recommended to seek guidance before undertaking the work, if a significant impact is identified this will need to be mitigated. (PSLP3046 Highways England) • Object to omission of land to the West of Stansted Mountfitchet being allocated for residential development. (13Sta15) (PSLP1168 City and Country) • Stansted Mountfitchet should be reclassified as a 'Local Centre' in view of its size, location, services and facilities and object to omission of land at Pennington Lane for residential development. (07/15Sta15; 24/25Sta16) (PSLP903 Bloor Homes)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Include reference to Transport Assessment or statement in policy(PSLP3046 Highways England) • Allocated additional site of 40 ha west of Stansted Mountfitchet for 800 dwellings. (13Sta15) (PSLP1168 City and Country) • Allocate 25ha of land north of Walpole Farm, West of Cambridge Road and west of Pennington Lane for up to 60 dwellings. (07/15Sta15; 24/25Sta16) (PSLP903 Bloor Homes)
31. Stansted Mountfitchet STA 1 (Land East of Cambridge Road (B1383) and west of High Lane	
SUPPORT	1
OBJECT	2

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SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> The allocation during the Plan period is considered reasonable given the recent substantial developments which have added nearly 1,000 dwellings. (PSLP2637 Stansted Mountfitchet PC)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> This proposal would result in considerable deterioration of landscape, especially approaching Stansted Mountfitchet from the North. (PSLP959 K McDonald) The Archaeological Assessment of allocated sites (February 2018) indicated that the site may contain archaeological deposits which will need to be considered by future development proposals, through an archaeological evaluation. (PSLP985 ECC)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Delete policy (PSLP959 K McDonald) Add an additional numbered bullet to read: An appropriate Archaeological Assessment will be required (PSLP985 ECC)
<u>31. Stansted Mountfitchet STA 2 (Land west of 8 Water Lane)</u>	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> The Archaeological Assessment of allocated sites (February 2018) indicated that the site may contain archaeological deposits which will need to be considered by future development proposals, through an archaeological evaluation. (PSLP968 ECC)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Add an additional numbered bullet to read: An appropriate Archaeological Assessment will be required (PSLP968 ECC)
<u>31. Stansted Mountfitchet STA 3 (Development Opportunity Site)</u>	
SUPPORT	
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> The Walpole Farm allocation could have potential air and/or water impacts on Thorley Flood Pound SSSI, Little Hallingbury Marsh SSSI, Elsenham Woods SSSI and Quendon Wood SSSI. The Elms Farm allocation may also affect the above SSSIs, and also Sawbridgeworth Marsh SSSI and Hatfield Forest SSSI & NNR. This area is located within the Lea and Stort Valleys, a priority area for measures to connect fragmented wildlife sites, improve management of priority habitats and species while using the natural assets of the river valleys and wider landscape to help enhance the lives of local people through improved greenspace. (PSLP2480 Natural England)
MODIFICATION REQUEST	
<u>31. Stansted Mountfitchet STA 4 (Land at Alsa Street)</u>	
SUPPORT	0
OBJECT	1
SUMMARY OF	

REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Currently no mention of heritage assets in policy. To the east lie some grade II listed barns and Als Lodge. (PSLP1965 Historic England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> The policy should refer to the listed barns and state, Development should preserve the grade II listed barns at Als Lodge and their setting. (PSLP1965 Historic England)
31. Stansted Mountfitchet STA 5 (Development Opportunity Site)	
SUPPORT	0
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> We welcome the reference to listed buildings and the Conservation Area in the policy, although ideally this would be included as a bullet point rather than a constraint. (PSLP1967 Historic England) For shops and services operating on Lower Street, Chapel Hill and Cambridge Road, improving car parking is a priority. Local businesses and employees are in competition with commuters and airport parkers for limited parking. UDC has already recognised that Stansted Mountfitchet faces the most acute parking issues in the District. Lower Street car park needs to be reorganised, a second deck added if possible and consideration given to re-siting the skate-park (subject to a suitable location being identified and funding allocated). Crafton Green car park and adjacent community facilities need to be analysed to make best use of this valuable site. Analysis on the feasibility of building a multi-purpose hall, a second deck and the acquisition of land behind 14 Cambridge Road for additional parking need urgent attention. (PSLP2638 Stansted Mountfitchet PC)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Make reference to listed buildings and conservation area in bullet point rather than constraint. (PSLP1967 Historic England)
31. Stansted Mountfitchet STA 6 Land adjacent to Forest Hall School	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> We welcome the reference to listed buildings in the policy, although ideally this would be included as a bullet point rather than a constraint. (PSLP1969 Historic England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Make reference to listed buildings as a bullet point rather than a constraint. (PSLP1969 Historic England)
32 Stebbing	
SUPPORT	
OBJECT	1
SUMMARY OF	

REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Object to omission of land west of High Street – Plot A south of Downs Villas and Plot B south of Falcons (07 & 08Sta16) (PSLP1598 Newfields Agricultural Holdings Ltd)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Allocate land west of High Street – Plot A south of Downs Villas and Plot B south of Falcons (07 & 08Sta16) (PSLP1598 Newfields Agricultural Holdings Ltd)

32. Stebbing STE 1 (Land east of Parkside and rear of Garden Fields)	
SUPPORT	
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Development at the scale proposed is unlikely to have a severe affect upon the Strategic Road Network (PSLP3047 Highways England)
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
33 Takeley / Little Canfield	
SUPPORT	0
OBJECT	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> We would expect any development coming forward to provide either a Transport Assessment or Statement carried out in accordance with current guidance and best practice, any applicant is strongly recommended to seek guidance before undertaking the work, if a significant impact is identified this will need to be mitigated. (PSLP3048 Highways England) Takeley is a sustainable settlement and object to low apportionment of growth to Takeley. Object to omission of land at Parsonage Road for development (12Tak15) (PSLP2823 Endurance Estates) Object to omission of 4.42 ha south of Takeley (SLAA reference 06GtCan17). (PSLP2917 Village Developments Takeley) Omission: Land north of Takeley Street is a suitable location for an Employment Area.(13Tak15) (PSLP2741 Pigeon Investment)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Include reference to Transport Assessment or statement in policy (PSLP3048 Highways England) Allocate land at Parsonage Road for development PSLP2823 (12Tak15)Endurance Estates) Allocate land SLAA reference 06GtCan17 (PSLP2917 Village Developments Takeley) Land north of Takeley Street be allocated as proposed Employment Area. (13Tak15) (PSLP2741 Pigeon Investment)
33. Takeley / Little Canfield TAK 1 (Land Between 1 Coppice Close and Hillcroft, South of	

B1256, Takeley Street)	
SUPPORT	0
OBJECT	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • The Archaeological Assessment of allocated sites (February 2018) indicated that the site may contain archaeological deposits which will need to be considered by future development proposals, through an archaeological evaluation. (PSLP987 ECC) • This is a sensitive site to development and careful consideration needs to be given to the setting of the nearby listed buildings but also to the relationship of the currently open space which links the Deer Park with Takeley Street.. (PSLP1970 Historic England) • Policy does not recognise that site falls within Hatfield Forest Zone of Influence. (PSLP2493 National Trust) • Development through allocations could have potential impacts on Elsenham Wood SSSI and Hatfield Forest SSSI & NNR. • Development through the allocations should make a positive contribution to the Essex Living Landscape initiative, through an appropriate requirement in Policy EN7 as discussed above.(PSLP2481 Natural England)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Add an additional numbered bullet to read: An appropriate Archaeological Assessment will be required (PSLP987 ECC) • Recommend that a a brief Heritage Impact Assessment is undertaken in relation to this site allocation before it is carried through as an allocated site. As an absolute minimum, reference should be made in the policy to the need to preserve the listed buildings and their settings. (PSLP1970 Historic England) • Policy should require applications for new residential development within the Hatfield Forest Zone of Influence to be supported by a SSSI Impact Assessment. Development which alone, or cumulatively is likely to have an adverse impact upon Hatfield Forest should provide appropriate mitigation. Mitigation may include providing or contributing to measures on or off-site. Financial contributions could be sought through a tariff and secured through a S106 Agreement. (PSLP2493 National Trust)
33. Takeley / Little Canfield TAK 2 (Residential Commitments)	
SUPPORT	
OBJECT	
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
33. Takeley / Little Canfield TAK 3 (Takeley Mobile Home Park)	
SUPPORT	

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OBJECT	
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
<u>34 Thaxted</u>	
SUPPORT	1
OBJECT	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Development at the scale proposed is unlikely to have a sever affect upon the Strategic Road Network (PSLP3049 Highways England)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Research conducted by the Thaxted Society shows the traffic problem in Thaxted. (PSLP 624 Thaxted Society) Object to omission of 9 ha land south of Sampford Road, Thaxted for 104 dwellings). (04Thax15) (PSLP2790 Countryside Properties) Object to omission of land at Wedow Road (Phase II) (09Thax15) PSLP2879 Linden Homes)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Allocated land east of Park Street in Thaxted for up to 80 dwellings (15Tha15) (PSLP822 Stonebond Properties) Allocated land south of Sampford Road Thaxted for 104 dwellings (04Tha15) (PSLP2790 Countryside Properties) Allocate Land at Wedow Road (Phase II) Thaxted. (09Tha15) (PSLP2879 Linden Homes)
<u>34. Thaxted THA 1 (Land at Claypits Farm, Bardfield Road)</u>	
SUPPORT	0
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> We welcome the reference to listed buildings in the policy although ideally this would be included as a bullet point rather than a constraint. (PSLP1971 Historic England) Whilst this site is identified in the Emerging Neighbourhood Plans there are concerns over Access which must be addressed prior to any application being considered. We are concerned that the access is within the Conservation Area and a significant new junction will alter its character. We are also concerned that it is immediately opposite the school, giving rise to issues of safety. Further, there will be a significant impact on the setting of Claypitts Farmhouse, a listed building. (PSLP2411 Thaxted PC)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Make reference to 'Development should preserve the listed buildings and their settings' as a bullet point rather than constraint. (PSLP1971 Historic England) In accordance to the Emerging Neighbourhood plan Policy TX HD5 quantum should be reduced to 15. (PSLP2411 Thaxted PC)
<u>34. Thaxted THA 2 (Residential Commitments)</u>	
SUPPORT	
OBJECT	

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SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
34. Thaxted THA 3 (Land east of The Mead, Thaxted)	
SUPPORT	0
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • The site holds significant environmental interests and has the potential to host an ecological significance to species such as newts, bats and rare orchids. Clarity is needed as to why this site is allocated (PSLP2412 Thaxted PC) • Object to allocation of site for potential education or other community uses. Site is landlocked. Site not large enough for primary school. (PSLP2772 Countryside Properties)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Delete Policy (PSLP2412 Thaxted PC) • Land to the south of Sampford Road, Thaxted, should be allocated for residential development and include land for a new 2FE Primary School. Policy THA3 should be deleted from the plan, or form part of an allocation for residential development at Land south of Sampford Road. (PSLP2772 Countryside Properties)

<i>Uttlesford District Council Regulation 19 Pre-submission Local Plan; Summary of Responses</i>	
Section / Paragraph / Policy	Summary of Responses
36. Delivery and Monitoring	
SUPPORT	0
OBJECT	3
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • The proposed mechanisms for monitoring the delivery of the plan are inadequate to ensure success. In relation to the new garden communities they fail to adhere to the Garden City Principles, particularly 1-3. They are also unproven and UDC does not seem to have taken on board methods that have been used in other districts where new communities have been established. This significantly increases the risk that the plan will fail. (PSLP700 Richard Gilyead) • Point 36.25 states ‘the process of implementing the local plan must ensure that the needs of present communities continue to be met without placing an unacceptable burden on existing infrastructure’. This is clearly not going to be achieved and no wishful thinking on the Council’s behalf will make it any more likely. (PSLP1831 Mrs B Marchant-Williams) • Some of the monitoring proposals are poor and the thresholds are inadequate when looked at in relation to green space, sports provision or affordable housing. It is difficult to assess the monitoring required in the absence of a district wide infrastructure plan. There is no delivery at all proposed of any community facilities; there is nothing at all on sustainable transport; disagree with the focus of provision of 4 bedroom homes rather than smaller ones and should be reversed; there is nothing at all on schools, health facilities or other community facilities. (PSLP2238 We Are Residents)
MODIFICATION REQUEST	
<u>Policy M1: Delivery and Review</u>	
SUPPORT	2
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Braintree District Council continues to support the reference in criteria 9 to compulsory purchase orders which could be used if necessary. (PSLP 2066 Braintree DC) • Support Policy M1 and Appendix 2 which will aid the effective implementation and delivery of the housing requirement set out in policy SP3. Support the monitoring of housing delivery against the Housing Trajectory. (PSLP974 Grosvenor)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Policy M1 as it is not compliant with the guidance set out in the Framework and Planning Practice Guidance with regards to the spreading the backlog over the remainder of the plan period. It is also not sufficiently positive when it comes to potential contingencies should the plan be failing. (PSLP970 Gladman)
MODIFICATION REQUEST	
<u>Policy M2: Implementation and Monitoring of Strategic Projects</u>	
SUPPORT	1

OBJECT	6
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> The need for the Council to monitor the delivery of homes at the WBGC and the other garden communities within the District is recognised and appropriate contingency measures, as set out by policy M2, are supported. ANSC fully expect that, together with the land controlled by Galliard Homes at Boxted Wood, will be brought forward to realise at least 970 dwellings by 2033, including appropriate infrastructure as necessary to support the development. (PSLP2018 Andrewsfield New Settlement Consortium)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> The delivery of the West of Braintree Garden community may be on a different model to that on other major projects within UDC. We note and support that criteria 5 has been changed to enable direct intervention in the delivery of a site in order to support the timely delivery of sites as suggested in our previous comments. (PSLP2067 Braintree DC) The inclusion of proposed arrangements for marketing development with applications is unnecessary and is not a reasonable planning requirement. (PSLP970 Grosvenor) There is a mismatch between Paragraph 3 of Policy M2 and the last sentence of paragraph 36.19 (PSLP983 (K McDonald) In the event that Easton Park and North Uttlesford GCs do not deliver new homes as projected in the trajectory, the measures proposed in Policy M2 will not be sufficient to ensure that Uttlesford is able to meet its market and affordable housing needs. (PSLP2752 Crown Estates; PSLP2270 Countryside Properties) Policy is not effective or positive in addressing any shortfalls identified in housing delivery in the most expedient manner. (PSLP2800 Gladman)
MODIFICATION REQUEST	<ul style="list-style-type: none"> a bespoke policy for WoBGC which, as it applies across two local authority areas, could be set out in detail within the site specific DPD. A minor amendment may be necessary to the policy to make this clarification. (PSLP2067 Braintree DC) Amend policy to include the timetable and proposed arrangements for marketing development and infrastructure delivery. (PSLP970 Grosvenor) Change penultimate line of para 36.19 from "below 25% of" to "to more than 25% below (PSLP983 (K McDonald) Additional sites should be identified to provide some flexibility should the timetables for the new settlements slip. Policy M2 should be amended to include a commitment to an early Local Plan review should it become apparent that the new settlements will not deliver new homes in accordance with the Local Plan trajectory. (PSLP2752 Crown Estates; PSLP2270 Countryside Properties) Policy should also be substantially reviewed to ensure that it is effective and positive and does everything it can to address any shortfalls identified in housing delivery in the most expedient manner. (PSLP2800 Gladman)
37. Glossary	
SUPPORT	0

OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Policy INF 1 states that Exemplar types of infrastructure are provided in the glossary and appended to this Plan but no definition of infrastructure is included in the glossary. (Essex County Council PSLP990)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Please include the term “significance” (Historic England; PSLP1973)
38. Appendix 1: Replacement Policies	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
39. Appendix 2: Monitoring Framework	
SUPPORT	1
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> The strategies are appropriate, and consistent with national policy as embodied in the NPPF. The garden communities and in particular the West of Braintree will provide the opportunity to meet the objectives (PSLP786 Galliard Homes)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Object to the percentages allocated to 1 and 2 bed, 3 bed and 4+ bed dwellings as it is not possible to state the appropriate percentages across the whole District (PSLP343 Elsenham PC). Monitoring of provision of accessible homes and housing for older people is required (PSLP343 Elsenham PC) Objective 3a is inappropriately worded (PSLP993 K McDonald) Some of the monitoring proposals are poor and the thresholds are inadequate when looked at in relation to green space, sports provision or affordable housing. It is difficult to assess the monitoring required in the absence of a district wide infrastructure plan. There is no delivery at all proposed of any community facilities; there is nothing at all on sustainable transport; disagree with the focus of provision of 4 bedroom homes rather than smaller ones and should be reversed; there is nothing at all on schools, health facilities or other community facilities. (PSLP3051 We Are Residents) Policy H6 is at odds with the Monitoring Framework Appendix 2 target for affordable housing. Policy H6 requires 40% affordable housing, which with an annual housing requirement of 640 new homes equates to 256 affordable homes per annum. The target for objective 1a is only 150 affordable homes per annum, and therefore should be amended to 256. (PSLP2242 We Are Residents)

MODIFICATION REQUEST	<ul style="list-style-type: none"> Monitoring of provision of accessible homes and housing for older people is required (PSLP343 Elsenham PC) In Objective 3a remove redundant 'and' in the first line of text (PSLP386 G Mott) In objective 3a 5th bullet point replace '..by not allowing development...' with "...by only allowing development' or preferably the wording should be strengthened by rewording on similar lines to the provision concerning MG in the bullet point above and become 'Maintaining and protecting the Countryside Protection Zone by only allowing development in very special circumstances'. (PSLP386 G Mott) Amend Objective 3a as follows: Line 1 - delete "and". Bullet 4 - line 2 - delete "inappropriate". Bullet 5 - line 2 - change "do not" to "would" (PSLP993 K McDonald) Policy H6 requires 40% affordable housing, which with an annual housing requirement of 640 new homes equates to 256 affordable homes per annum. The target for objective 1a is only 150 affordable homes per annum, and therefore should be amended to 256. (PSLP2242 We Are Residents)
40. Appendix 3: Housing Trajectory	
SUPPORT	1
OBJECT	7
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Support the changes to appendix 3 in relation to the separation of delivery among the three garden communities for ease of reference. (PSLP2070 Braintree DC)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Object to the stepped housing target and the use of the 'Liverpool' approach to addressing the housing delivery backlog. It artificially reduces the housing target in early years while failing to adequately address past under-supply. (PSLP787 Galliard Homes) (PSLP195 Bloomhall) (PSLP678 / PSLP712 Swords) (PSLP2200 Chase New Homes) UDC need to demonstrate that the growth projections in the Local Plan are based on current and realistic analysis. The projected figures for new housing are questionable, being 50% higher than neighbouring districts and having one of the biggest proposed expansion rates in the country. It is not clear why UDC are imposing this level of growth.(PSLP1052 Julie Williams) The Trajectory makes unjustified assumptions about delivery rates at the Garden Community sites during later parts of the Plan period. Any shortfall against projected delivery will need to be addressed through additional sites however, the plan offers practically no flexibility for these to be delivered in sustainable locations later in the Plan period (PSLP2828 Endurance Estates)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Allocate the delivery of homes from West of Braintree Garden Community from 2022/3 onwards, as advised by the promoter/developer. By adding 250 homes (50,100,100) to the 3 years from 2022/3 onwards for W of B this will more accurately reflect the developer's plans and then by increasing the annual

	<p>totals from 2025/6 onwards a delivery of at least 1400 homes can be shown within the Plan Period. (PSLP787 Galliard Homes)</p> <ul style="list-style-type: none"> • The housing trajectory should be revisited using the Sedgfield Method to ensure that the Local Plan complies with the PPG and addresses the current housing need, including any shortfall, in the first five years of the plan. Realistic delivery rates should be used when determining likely annual completions on the Garden Communities sites and additional allocation should be made to cover the shortfall. (PSLP195 Bloomhall) • The trajectory must demonstrate delivery of a total of at least 4,567 dwellings over the first five years of the plan period, comprising 636 dwellings per annum, plus the shortfall accrued since the start of the Plan period and allowing for a buffer of 20% for persistent under delivery. The trajectory should include a windfall allowance of 50 dpa, rather than 70dpa. The strategy of Garden Communities is considered unsound and alternative small deliverable sites need to be allocated to meet the OAN such as 05New15. (PSLP678 Sworders) / 04Cla15 and 05Cla15 in Clavering (PSLP712 Sworders) • Additional allocations are made in sustainable locations. Land at Parsonage Road, Takeley, would, through a single allocation, be capable of closing entirely the gap in housing numbers, and should therefore be considered for allocation. (PSLP2828 Endurance Estates)
41. Appendix 4: Garden Community Principles	
SUPPORT	1
OBJECT	12
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • The draft Local Plan makes it clear that TCPA Garden City Principles will be adhered to and reproduces those principles in Appendix 4. This is very welcome and, if true, would imply a very high quality development with excellent infrastructure. (PLSP1064)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Not clear how the land value capture for the benefit of the community works. With regards payment and explanation of who benefits. (PSLP387) • Unclear as to whether private developers would adhere to such principles even if they were in place. This settlement would not meet the housing needs of those working within the settlement or indeed Uttlesford itself. (PSLP1097) • Clarity required on the intended purpose and status of Appendix 4. In particular, we note that under point 4 it is stated that at least 30% of homes in a new Garden City should be for social rent with a further 30% provided for other forms of affordable housing. This conflicts with Policy H6 which states that 40% affordable housing will be required, unless evidence can be provided to demonstrate viability issues. (Land Securities; PSLP2615)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • We would like to see principle no7 amended to state that trees and woodland should be included in the new garden cities to enable the aspirations of combatting climate change and on flood alleviation to be delivered (The Woodland Trust; PSLP893)

	<ul style="list-style-type: none"> To make this Plan sound, we ask that Policy SP5 is amended to include all users and therefore be consistent with the stated Garden Community Principles at Appendix 4. (Fritch Way Action Group; PSLP626) In order to remove the areas of ambiguity we consider that Appendix 4 should be removed in its entirety. Furthermore, to achieve the target of being zero carbon and free of polluting vehicles within 20 years, would rely on significant advancements within other industries which is beyond our Client control. This reinforces the need to delete the appendix as it is potentially misleading. (Landsec; PSLP2615)
42. Appendix 5: Marketing Assessment Information	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Appendix is unclear and imprecise therefore would not give a decision maker a clear indication of how to react to a proposal (Sworders; PSLP866)
MODIFICATION REQUEST	<ul style="list-style-type: none"> We would like to see principle no7 amended to state that trees and woodland should be included in the new garden cities to enable the aspirations of combatting climate change and on flood alleviation to be delivered (Sworders PSLP866)
43. Appendix 6: Existing Employment Sites Schedule	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
44. Appendix 7: Inset Maps	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
45. Policies Key	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	

SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
46. Policies Map	
SUPPORT	0
OBJECT	2
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Omission of Safeguarding Zone around IWM Duxford where applications for development will be the subject of consultation with the aerodrome operator. (PSLP2510 Imperial War Museums) • Paragraph 3.82 states that DPDs will be prepared, which will determine the full extent of the land required for each Garden Community. As such, we consider that the Local Plan Proposals Map needs to show the full extent of the land required to deliver the Garden Communities, including any areas required for mitigation purposes, in particular where these are in third party ownership, in order to ensure that the Garden Community and compulsory purchase policies are effective and the latter can be implemented, if necessary. (PSLP2604 Land Securities)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Identify Safeguarding Zone on policies map. (PSLP2510 Imperial War Museums) • Show the full extent of the land required to deliver the Garden Communities, including any areas required for mitigation purposes, in particular where these are in third party ownership. (PSLP2604 Land Securities)
47. Easton Park Garden Community	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
48. North Uttlesford Garden Community	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
49. West of Braintree Garden Community	
SUPPORT	2

OBJECT	
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Support the proposed Inset Map which in effect zones the land area that will form the WoBGC (PSLP2005 Andrewsfield New Settlement Consortium) • The land that comprises the WoBGC (Uttlesford portion) is deliverable over the plan period. (PSLP807 Galliard Homes)
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
50. Arkesden	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
51. Ashdon Church End	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
52. Ashdon	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
53. Barnston	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	

54. Berden	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
55. Birchanger & Parsonage Farm	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
56. Chesterford Research Park	
SUPPORT	1
OBJECT	
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> The allocation is supported (PSLP2035 Aviva Life and Pensions)
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
57. Chrishall	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
58. Clavering Hall Green	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	

59. Clavering	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
60. Debden	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
61. Elmdon	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
62. Elsenham Industrial Estate	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
63. Elsenham	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	

64. Felsted Causeway End	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
65. Felsted Hartford End	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
66. Felsted Watch House Bannister Green	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Allocation of FEL2 is supported (PSLP904 Springfield Planning)
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
67. Felsted	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Omission to include of land north of FEL1. This area of land is proposed to remain undeveloped and is important to help mitigate the visual impact of the proposed development, contain the development within its boundaries and to prevent coalescence with Flitch Green by providing a green landscaped buffer. (PSLP1609 J Young)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Inset Map should be amended to include the area of land that is proposed to be utilised as open space which lies immediately to the west and is within the same ownership.(PSLP1609 J Young)
68. Flitch Green	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN	

SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
69. <u>Great Canfield</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
70. <u>Great Chesterford</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
71. <u>Great Dunmow Central</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
72. <u>Great Dunmow</u>	
SUPPORT	1
OBJECT	
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Support development limits which include land (The Yard) within development limits as it makes a logical extension to adjacent allocated land and is contained by B1256 and A120. (PSLP1617 L Barlow)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> In Great Dunmow Policy Map. Blue hatching for education missing from site allocations GtDUN8 and GtDUN9. GtDUN1 hatching is different from key. (PSLP992 ECC)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Mark all new education land on maps to ensure land is not considered to have residential 'hope' value. (PSLP992 ECC)

73. <u>Great Easton</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
74. <u>Great Hallingbury Bedlars Green</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
75. <u>Great Hallingbury Start Hill</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
76. <u>Great Hallingbury</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
77. <u>Great Sampford</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	

78. Hadstock	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
79. Hatfield Broad Oak	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
80. Hatfield Heath East	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
81. Hatfield Heath West	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
82. Hazel End	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	

83. <u>Hempstead</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
84. <u>Henham</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
85. <u>High Easter</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
86. <u>High Roding</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
87. <u>Leaden Roding</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	

88. <u>Little Dunmow</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
89. <u>Little Easton</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
90. <u>Little Hallingbury North</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
91. <u>Little Hallingbury South</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
92. <u>Littlebury</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	

93. <u>Manuden</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
94. <u>Newport</u>	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Object to omission of land to the south of Bricketts being omitted from Policy NEWP2. (03New15) (PSLP2436 M Flood)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Policy notation for NEWP2 be extended to include land to the south. (03New15) (PSLP2436 M Flood)
MODIFICATION REQUEST	
95. <u>Quendon & Rickling Green</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
96. <u>Radwinter</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
97. <u>Saffron Walden Audley End</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	

98. Saffron Walden Central	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
99. Saffron Walden	
SUPPORT	0
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Object to allocation of Pulse Packaging Radwinter Road as an employment site. (20Saf17) (PSLP1684 The Joint Administrators of Pulse Packaging) • Object to lack of clearly identified green spaces which need to be protected from housing development. (PSLP1803 D Kent) • School playing fields (including Friends School) must be mapped as Protected Open Space (PSLP2376 Saffron Walden TC) (PSLP2969 Saffron Walden and Little Walden Neighbourhood Plan Group)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • The Saffron Walden Inset Map should be amended to remove the employment allocation from the site. The site should be included within the list of sites, within Chapter 29 (20Saf17) (PSLP1684 The Joint Administrators of Pulse Packaging) • The site of the former Friends/Walden School playing fields should be retained as a green lung for sports use • Omission of school playing fields being identified as protected open space. (PSLP2376 Saffron Walden TC) (PSLP2969 Saffron Walden and Little Walden Neighbourhood Plan Group)
100. Swards End	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
101. Stansted Airport	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN	

SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> To the western boundary of the airport site, the Strategic Landscape Area (green check hatch) overlaps the proposed 55ha employment allocation (pink wash). Specifically, this is because the landscape policy line does not follow the strategic planting on site. The Public Safety Zones (PSZ) are chopped off the top and bottom edges of the insert. These are important policy areas and consideration should be given to how the plan could be set out at either a smaller scale to accommodate them, or have the insert across two pages. (PSLP1526 Manchester Airport Groups)
MODIFICATION REQUEST	<ul style="list-style-type: none"> The strategic landscape area line should be corrected to follow the planting on site. This would have the effect of aligning the two policy allocations and not creating overlap. (PSLP1526 Manchester Airport Groups)
102. <u>Stansted Mountfitchet Alsa Street</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
103. <u>Stansted Mountfitchet Central</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
104. <u>Stansted Mountfitchet</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
105. <u>Stebbing</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	

SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
106. <u>Takeley Priors Green</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
107. <u>Takeley Street</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
108. <u>Takeley</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
109. <u>Thaxted</u>	
SUPPORT	0
OBJECT	1
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • A significant number of open spaces are omitted (PSLP2417 Thaxted PC)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Open spaces identified on map. (PSLP2417 Thaxted PC)
110. <u>Wendens Ambo</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	

SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
111. <u>White Roding</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
112. <u>Wicken Bonhunt</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
113. <u>Widdington</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
114. <u>Metropolitan Green Belt</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	
115. <u>Countryside Protection Zone</u>	
SUPPORT	0
OBJECT	0
SUMMARY OF REPRESENTATIONS IN	

Statement of Consultation
Summary of Reg 19 Representations Chapters 36-115
Delivery and Monitoring, Glossary and Appendices

SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	

<i>Uttlesford District Council Regulation 19 Pre-Submission Local Plan Summary of Representations</i>	
Sustainability Appraisal	
1. Introduction	
<ul style="list-style-type: none"> • Disagree with a number of SA conclusions on Site ELS6 (land West of Station Road) and ELS7 (Land North of Stansted Road) <i>(The Crown Estate PSLP 2759)</i> 	
<ul style="list-style-type: none"> • The Council has considered a range of growth options as set out in the Identification of Reasonable Alternatives Paper April 2017. This includes a review of all known new settlement options, as well as a new settlement strategy in combination with other approaches to growth, e.g. development in villages, development in main towns. <i>(Galliard Homes PSLP 775)</i> 	
<ul style="list-style-type: none"> • I did not know this question would appear. There has been no mention of the Sustainability Appraisal previously. It is not easy to find. The Guidance Notes don't help, and they don't say where it is either. <i>(PSLP 642)</i> 	
2. Spatial Portrait Vision	
<ul style="list-style-type: none"> • The Sustainability Appraisal flaws identified in the North Essex Strategic Section 1 Plans are applicable to UDC Reg 19 Local Plan because it was undertaken by the same organisation and UDC relies wholly on the extension of West of Braintree Garden Community into Uttlesford. The current Reg 19 Plan is unsound and the chosen spatial strategy cannot possibly be demonstrated to be the most appropriate one when considered against reasonable alternatives. <i>(Bloor Homes Eastern PSLP 896)</i> 	
•	
<ul style="list-style-type: none"> • Provision of multi-user routes with accessibility for all vulnerable road users – pedestrians, cyclists, equestrians and the disabled – should be the default where provision for non-motorised routes is planned within or around any new developments e.g. linking of the Flitch Way where the route is planned to run via the existing and proposed developments around the southern part of Great Dunmow. Its inclusion in the Local Plan would go far to addressing issues of soundness and sustainability. <i>(Flitchway Action Group PSLP 636)</i> 	
<ul style="list-style-type: none"> • In Section 5.2.1 of the Sustainability Appraisal the council suggests that the proposed spatial vision "...is particularly strongly aligned to those sustainability objectives related to housing and economic growth, accessibility and sustainable travel..." however, the spatial strategy has taken little to no account of the possible sustainable opportunities for residential development on the edge of Bishop's Stortford. The land south of Beldams Lane, Bishop's Stortford (call for sites reference 03GtHal15) is serviced by a bus route that stops twice on Beldams Lane and within walking distance of the railway station and the town centre. A residential allocation for 180 dwellings in this location would encourage greater walking and cycling trips to access everyday services and facilities helping the council to effectively meet the requirement for sustainable development. <i>(Bloomhall PSLP 179)</i> 	
<ul style="list-style-type: none"> • Use of existing Stansted airport capacity limit to be maintained; • Night flights to be reduced; • Green spaces to be added; and • Environmental limits to be applied <i>(PSLP 1790)</i> 	
<ul style="list-style-type: none"> • The area is very short of water, roads are very busy, area is under aircraft noise and there are no local jobs except at Stansted, all 3 'Garden Communities' are predicated on the A120, 	

<p>which will not be able to cope at peak periods and new residents will speed through country roads. The proposed development cannot be contained in the specified area without taking over the whole area. (PSLP 41)</p>
<ul style="list-style-type: none"> • The objective stated in the Local Plan (2c) to maximise the existing capacity of the runway at Stansted Airport is incompatible with a sustainable agenda to reduce carbon emissions – the Local Plan should seek to reduce the number of flights from Stansted Airport, not fill the airport to capacity; and • Statements in the plan about encouraging greater use of public transport are meaningless in the face of the huge expansion of the population that it envisages living in the district. For example, the Cambridge to London Liverpool Street railway line already struggles to handle demand at busier times and the modest increase in capacity referred to in the Local Plan will be woefully inadequate (PSLP 2050)
<p>3. Spatial Strategy</p>
<p>This was compiled by Place Services for UDC and looks in our view to be a classic case of ‘he who pays the piper calls the tune’. There are some good factual points included but also a clear propagandist aspect, such as:</p> <ul style="list-style-type: none"> • Suggesting the 3 new Garden Communities will “be exemplars of 21st Century living”. • Stating that: “There will be convenient, comfortable, safe and affordable environmentally sustainable alternatives to the use of the car...” • Claiming that “development of Garden Communities will alleviate pressures on existing settlements in the later stages of the plan period...” True in some regards (pressures on Newport etc. would otherwise have been even more intense) but overlooking how the Garden Communities will themselves add massively to traffic congestion and will cause other issues. • Suggesting for the valuable Grade 2 agricultural land lost to Garden Communities that yes, this is a negative, but “a pragmatic approach to such losses should be taken within the context of meeting the District’s housing needs”. • Assuming (why?) that: “each new settlement will progress to be largely self-sustainable in terms of the provision of a sufficient amount of infrastructure, services and facilities”. • Noting risks exist as regards potential air and noise pollution aspects but remarking that “mitigation can be seen as possible in all instances.....” [so].....”there will be a neutral plan-wide impact”. • Observing how only 2 of 6 Primary schools in Saffron Walden have capacity for additional places but then bushing this aside as “...infrastructure contributions are likely to alleviate such pressures”. <p>Overall, we have doubts regarding the intellectual rigour applied.(PSLP 2651)</p>
<ul style="list-style-type: none"> • The Sustainability Appraisal is inadequate; • Concreting over the countryside cannot be viewed as sustainable and is highly damaging to the environment and to potential food growing supply; • Adding thousands more cars and lorries to narrow town and country roads and lanes can only cause further congestion and add to the current illegal Air Quality as well as diminishing the quality of life for local residents; • The social, environmental and economic impact of the Plan has not been properly assessed; • There are no plans to increase educational and medical facilities which are already at peak

<p>use;</p> <ul style="list-style-type: none"> • There is no sports and leisure strategy, there is no air quality policy, there is an insufficient transport policy; and • There is an unrealistic economic policy- most people commute to London or Cambridge as the few local jobs are poorly paid and residents cannot afford to work and live here, Stansted Airport provides some low-paid work, but most airport employees come from outside of the district.(PSLP 2192)
<ul style="list-style-type: none"> • The Inspector Mr Clews in his letter dated 8th June 2018 point 31 In my view the evidence provided is lacking..... Point 99 and 103 and 109 which states....." I consider that the lack of clarity I have identified in the descriptions of some of the alternatives to the chosen spatial strategy, and in the reasons for selecting them, is likely to breach the legal requirements for the SA report to provide an outline of the reasons for selecting the alternatives dealt with, and for the public to be given an effective opportunity to express their opinion on the report before the plan is adopted." <p>UDC should not have gone forward with regulation 19 regards West Of Braintree knowing this. This is a flagrant waste of public money in all respects..... NEA have wasted £ 4m to get to this stage something that raised the eyebrows of the inspector when it was revealed. How much have UDC used to get to this stage? (PSLP 263)</p>
<ul style="list-style-type: none"> • Transport problems and lack of infrastructure makes NUGC unsustainable. Sections 3.17/18 mention access to M11 and local railway stations. There is no northbound access at local junction 9 and two-lane carriageway in both directions mean it is frequently congested or at a standstill with accidents. Northbound M11 traffic would have to go via country roads to A505 at a congested roundabout, then to junction 10; and • Great Chesterford station has no parking, nor facilities and only a slow stopping service to London or Cambridge. Whittlesford Parkway has limited parking, but again access via country roads to A505.(PSLP 257)
<ul style="list-style-type: none"> • I have read through the spatial strategy document in policy SP2 of the draft local plan, I consider it to be sound and therefore support it. (PSLP 206)
<ul style="list-style-type: none"> • The council have failed to identify appropriate mitigation measures in plan-making, as required by the NPPF. • The NPPG states: "Every area will have different challenges and opportunities for reducing carbon emissions from new development such as homes, businesses, energy, transport and agricultural related development; • This plan has not made any such 'robust evaluation of future emission sources', it does not explore emission reduction options and it disregards the government's target of greenhouse gas emissions; • It has not taken into account any research into human behaviour when making choices of transport options particularly with regard to commuting, to ascertain whether this plan would ensure that CO2 emissions fall quickly enough to reach those targets; • SP6 Easton Park, SP7 North Uttlesford and SP8 Braintree have vague statements about provision of 'direct 'direct, high quality, frequent and very fast rapid, transit priority measures' and choices available to commuters do not include railways. Once houses and roads have been built over a potential railway route, the opportunity for genuinely sustainable transport will be lost for ever;

<ul style="list-style-type: none"> • The cost over the next decades and generations - the lifetime of the new development indeed - of not making this investment at the outset will be incalculable. Affordability must be calculated across such a time frame if we are to be sustainable. Sustainably affordable; • SP7 North Uttlesford – Transport – Audley End station is ignored and future sustainable development should be orientated around existing railway network; • SP8 Braintree – Transport – No mention of trains; • SP11 Stansted Airport: No mention is made of the increases in CO2 emissions or noise or the impact on air quality that would accompany the planned growth. How will it help Uttlesford meet the national carbon emissions reductions to cut emissions by 34% by 2020 and 80% by 2050 below 1990 levels? There is no mention of increased noise in the area, even though the proposed Easton Park Garden Community is immediately adjacent, nor of the negative impact on air quality; • SP 12 - The Sustainable Development Principles contains nothing about meeting national CO2 reduction targets. It is as if Uttlesford regards itself as being exempt from the national requirements to meet the Paris agreement targets; and • The plans mentions 'Promoting development that is located and designed to be energy efficient' but sets no targets for the level of efficiency required. Development today MUST be fit for purpose over the lifetime of the building. Presumably for the next 50-75 years. Houses built now should both be carbon neutral, or very close to it, in order to reduce the risk of calamitous climate change and be equipped to cope with such change in the inhospitable years ahead. This plan sets out not such requirements, standards, vision or expectations. (PSLP 137)
<ul style="list-style-type: none"> • Objective 3b seeks merely to 'Promote' sustainable design. What does 'Promote' mean? It is weak and ineffective. No clear standards are set in the documents to define what level of sustainability is to be required of developers; • It seeks to 'Encourage renewable energy production'. Encouragement is a very weak form of leadership and not a form of government. Encouragement can be easily ignored, as will be so ignored if there are no financial incentives; • It claims to be 'resilient to future climate change.' It does not seek to minimise climate change, show leadership to ensure that our targets under the Paris agreement are met, there is no sense of leadership that Uttlesford, as a prosperous, privileged, economically strong District in a developed country, should do anything to ensure that the radical changes that our needed to minimise the catastrophic effects of climate change will be made here. The plan is supine in respect of sustainability and seeks only to be passively resilient to it; • It claims to support 'sustainable travel' yet wholly ignores the best railway station in the area. The most sustainable form of transport other than walking and cycling is the train. No explanation is given for the decision to totally ignore this railway service and the contribution it could make to sustainability; and • The proposed garden village at Chesterford is beyond commutable walking distance to the station there, which has a far inferior service, and will therefore mean that most commuters will continue to use their cars. (PSLP125)
<ul style="list-style-type: none"> • The plan as it stands will result in a concrete corridor from the airport to Braintree, overflowed by noisy planes and intersected with roads choked with traffic and the dead bodies of animals. The plan is unsustainable and will result in Uttlesford becoming another Hounslow. (PSLP 42)
<ul style="list-style-type: none"> • Objective 3b seeks to 'Promote' sustainable design without establishing clear standards in the documents to define what level of sustainability is to be required of developers. • It seeks to 'Encourage renewable energy production' with no policy for doing this; clearly framed, achievable targets need to be set..

<ul style="list-style-type: none"> • It claims to be 'resilient to future climate change.' It does not seek to minimise climate change and show leadership to ensure that our targets under the Paris agreement are met. • It claims to support 'sustainable travel' yet wholly ignores the best railway station in the area. The most sustainable form of transport other than walking and cycling is the train. • The plan repeatedly refers to the LSCC, the London, Stansted, Cambridge Corridor, which is served by the railway line, but the railway line is being totally ignored at its principle station in Uttlesford! • In Saffron Walden, instead of giving commuters the option of housing where they can walk or easily cycle to the station, we will be housing them on the wrong side of town, where they will: <ul style="list-style-type: none"> ○ add to the traffic congestion ○ further pollute and reduce the air quality and add more CO2 into the atmosphere, accelerating global warming. (PSLP 650)
<ul style="list-style-type: none"> • The Spatial Strategy fails many of its objectives regarding sustainability and transport for the following reasons: <ul style="list-style-type: none"> a. For Stansted Airport to play a major part in this development plan, it must separate its access to the Coach and Train services and its associated parking requirements from those wishing to access it as an airport; and b. The B183 is missing from both the Key Diagram and whole Plan. Yet this road acts a major relief road if the M11 is blocked or closed. The impact of the Eastern Park development needs to be assessed in relation to the existing over-subscription of the B183. This road requires a radical approach for it to sustain the development plan as it stands. The spatial and transport plans are unsound without any consideration of the impact on this road both for the success of the plan and its impact on the local communities. (PSLP 1930)
<p>SP1 – Presumption in favour of Sus. Devt.</p>
<p>Under point 3.20, it is noted that the proposed West of Braintree Garden Community will have good access to the A120 and to the town of Braintree, with its alleged good transport links and employment possibilities. None of these statements are true.</p> <ul style="list-style-type: none"> a. The traffic from the proposed Garden Community has no agreed exit point to access the A 120. In addition, there is, as yet, no funding available for improvements to the A120. b. Braintree has a very small railway station, which is currently single track.. It will take years to upgrade this. If indeed, funding can be obtained for this, which is unlikely considering the time scale involved. c. Braintree Town is dying on its feet, with little employment other than retail and can barely sustain the existing local developments. This, like the proposed W of B G C, is set to become a dormitory town d. The Rapid Transport System proposed under W of B GC Plans was considered by the Inspector looking at BDC's Local Plan to be unachievable in the time scale proposed and uncertain in its implementation, due in part, to a lack of a feasibility study. (PSLP 954)
<ul style="list-style-type: none"> • It is noted that the SA comprises 590 pages, in addition to Annexes A, B and C totalling 232 pages, and a Non-Technical Summary of 57 pages. • In the very limited time available, it has been possible to make only a cursory review of the Non-Technical Summary. The following comments are offered: • 1.2 Sections 36 to 43 inclusive of the Local Plan are not mentioned. • Table 1, Key Local Documents: <ul style="list-style-type: none"> (i) The list of documents does not appear in the Local Plan consultation document, and

<p>thus the documents listed will not necessarily have been taken into account in responses.</p> <p>(ii) There is a need for absolute consistency in the naming of documents as they appear in the list and on the documents themselves.</p> <p>(iii) There is a need to include the web addresses where documents can be found, particularly those published by Uttlesford District Council.</p> <p>(iv) The list includes Housing Strategy 2012-15 (Uttlesford District Council, 2012). But Uttlesford District Council Housing Strategy 2016-21 is available and included as one of the documents which make up the Local Plan.</p> <p>(v) The list includes Strategic Housing Market Assessment (2012 [new assessment commissioned expected 2015]). Clearly the note makes little sense in a document published in 2018. In fact, there is a more recent, but less detailed, SHMA dated 2017.</p> <ul style="list-style-type: none"> • In the circumstances of lack of time and notice, the Parish Council is unable to comment further on the Sustainability Appraisal, but reserves the right to do so later if deemed appropriate. (Elsenham Parish Council PSLP 259)
<ul style="list-style-type: none"> • The Reg 18 and Reg 19 Sustainability Appraisals are very similar in most respects; • Of the seven scenarios (A to G) none resembles the current strategy with Scenario E based on 750 dwellings per annum and two new settlements being the closest; • In consideration of SP2 –The Spatial Strategy, all the seven scenarios are reviewed and described as unreasonable alternatives to SP2. The scenarios should have been regarded as less well developed pre-cursors to the preferred strategy; • The hybrid option of 3 new settlements distribution across the wider district warrants further exploration and testing within the SA; • Scenario E was rejected on the premise that reliance on 1or 2 large sites would have deliverability issues and deprive other settlements of sustainable growth and the strategy proposed by the Council based on 3 garden villages would therefore have more adverse impact; • Alleged need of three garden communities emerges from nowhere; • In Policy SP3, of the four alternatives, the three alternatives providing less housing should not have been considered; • In Policy SP5, impacts in the short and medium term are neutral in relation to all fifteen sustainability objectives and positive impacts are only indicated for the long term. The appraisal of the overarching Policy 5 and SP6, SP7 and SP8 do not explain or justify the benefits of the preferred strategy; • In policies SP6,SP7, and SP8 the impacts on sustainability objectives other than neutral are identified in the long term; • The SA is flawed as it does not show how the preferred strategy emerged from a range of plausible alternatives and therefore provides a wholly unsound underpinning for the emerging Local Plan; • The three principal shortcomings identified in the SA for the NEA Plan namely: first - the objectivity of the assessment of the chosen spatial strategy and alternatives to it; second - the clarity of the descriptions of those alternatives and of the reasons for selecting them, and third - the selection of alternative GCs and combinations of GCs for assessment. These shortcomings are considered applicable to the UDC Local Plan SA. (Eclipse Planning PSLP 2278)
<ul style="list-style-type: none"> • Hospital bed provision is a big problem as Broomfield, Harlow and Addenbrookes are already over full and the new garden community residents will need at least one new hospital. NHS involvement in the planning exercise is queried; • The Inspector for the NEA Plan indicated that the spatial strategy for WoBCC is unreliable. In the assessment of the chosen spatial strategy against alternatives that do not include GCs

<p>the report made optimistic assumptions about GC benefits and negative assumptions about alternatives and the assessment lack objectivity and therefore unreliable;</p> <ul style="list-style-type: none"> • No firm view on the feasibility of either WoBGC or CBBGC can be taken until it is known whether or not the A120 dualling scheme is included in that (RIS2) programme (or can be otherwise fully funded); • No evidence Rapid Transport System is viable; • The decision to site 2 garden communities in the south east corner of Uttlesford is fundamentally unsound. There is no evidence that the area can provide the necessary transport infrastructure, water supply, or employment opportunities required to support 20000 extra new homes. UDC does not have the power to make these necessities happen and simply resorts to wishful thinking (as does BraintreeDC in its GC proposal). • The combined effect of the WBGC and the Easton GC will be to urbanise the entire length of the A120 from Braintree to Stansted. This will completely change the essentially rural nature of the area and will adversely affect the air quality, noise pollution and general quality of life for all who currently live in the southern part of the UDC area. • There is no evidence that UDC is capable of delivering 3 GCs in the time scale given. The Inspector states that he does not consider 3 DCs capable of such a task so how would UDC be so much more competent? (PSLP 723)
<ul style="list-style-type: none"> • The SA results are unreliable in the proposal to concentrate the bulk of the new housing in 3 GCs. • The NEA Plan Inspector indicated that in assessing the chosen spatial strategy against alternatives that did not include GCs, the authors of the SA report had generally made optimistic assumptions about the benefits of GCs, and correspondingly negative assumptions about the alternatives, without evidence to support many of those assumptions. As a result these assessments lack the necessary degree of objectivity and are therefore unreliable. • With regard to SP2 -7 relating to infrastructure: • A120 is already saturated several times a day and cannot cope with the traffic to be generated from WoBCC and Easton Park Garden Community. • The funding of the A120 dualling is not guaranteed. • There is no evidence Rapid Transport System is viable.(PSLP 721)
<p>SP2 – Spatial Strategy 2011-2033</p>
<p>Scenario B of section 5.3.2 of the SA fails to represent a reasonable alternative for growth as it excluded the main towns within the district. Scenario G; however, which was discounted suggested that three rather than two new settlement be considered. The reference in scenario G to growth in Bishop's Stortford has however, been dropped from the further investigations identified and as such the approach is not justified as the potential for sustainable development at Bishop's Stortford has not been further investigate alongside the three proposed new settlements as a reasonable alternative or as a complimentary approach to help delivery and thereby the effectiveness of the Local Plan. (Bloomhall, Planserv; PSLP183)</p>
<p>Given the length of the SA document (590 pages) and its detailed content, it is unreasonable for UDC to demand that residents may a very time-consuming and considered response as a prerequisite to making a comment to the consultation. (PSLP435)</p>
<p>SA fails to justify the choices made and that it has not been demonstrated that the chosen spatial strategy is the most appropriate one when considered against the reasonable alternatives, as the tests of soundness require." As the Regulation 19 SA has been undertaken by the same organisation</p>

as the North Essex Section 1 Plan and relies wholly upon the West of Braintree Garden Community to be extended into Uttlesford, it is clearly seriously flawed and unsound for the principal reasons and shortcomings identified by the Inspector. For this reason above, the current Reg 19 Plan is unsound and the chosen spatial strategy cannot possibly be demonstrated to be the most appropriate one when considered against reasonable alternatives. (Bloor Homes, Eastern, PSLP898)

The Sustainability Appraisal is clearly flawed for reasons set out in the letter dated 8th June 2018 from the Inspector examining the North Essex Strategic Section 1 Plans. The Inspector's findings and identification of the shortcomings of the SA, referred to in paragraphs 93-129 of his letter, are particularly relevant and also apply to the UDC Plan because the WoBGC is proposed to be extended into Uttlesford. In particular he found "that the SA fails to justify the choices made and that it has not been demonstrated that the chosen spatial strategy is the most appropriate one when considered against the reasonable alternatives, as the tests of soundness require." As the Regulation 19 SA has been undertaken by the same organisation as the North Essex Section 1 Plan and relies wholly upon the West of Braintree Garden Community to be extended into Uttlesford, it is clearly seriously flawed and unsound for the principal reasons and shortcomings identified by the Inspector. For this reason above, the current Reg 19 Plan is unsound and the chosen spatial strategy cannot possibly be demonstrated to be the most appropriate one when considered against reasonable alternatives. (PSLP2473)

The Sustainability Appraisal and assessment of the suitability of the proposed Garden Communities at North Uttlesford and West of Braintree should be the subject of discussion at the Local Plan Examination. In this regard we note the emerging position in relation to the North Essex Authorities (NEA) Local Plan, which includes the majority of the West of Braintree Garden Community. It is presently unclear how the NEA intend to progress with their Local Plan, and therefore the robustness of the West of Braintree allocation in the Uttlesford Local Plan. The Sustainability Appraisal (SA) of the Garden Communities does not explicitly confirm that the full allocations have been assessed, as opposed to being limited to those parts to be delivered during the plan period. The SA should be amended so that it is explicitly clear that the total allocations for the Garden Communities have been assessed i.e Easton Park 10,000 units. (Landsec, PSLP2587)

This was compiled by Place Services for UDC and looks in our view to be a classic case of "he who pays the piper calls the tune". There are some good factual points included but also a clear propagandist aspect, such as:

- Suggesting the 3 new Garden Communities will "be exemplars of 21st Century living".
- Stating that: "There will be convenient, comfortable, safe and affordable environmentally sustainable alternatives to the use of the car..." •
- Claiming that "development of Garden Communities will alleviate pressures on existing settlements in the later stages of the plan period..." • True in some regards (pressures on Newport etc would otherwise have been even more intense) but overlooking how the Garden Communities will themselves add massively to traffic congestion and will cause other issues.
- Suggesting for the valuable Grade 2 agricultural land lost to Garden Communities that yes, this is a negative, but "a pragmatic approach to such losses should be taken within the context of

meeting the District’s housing needs”.

- Assuming (why?) that: “each new settlement will progress to be largely self-sustainable in terms of the provision of a sufficient amount of infrastructure, services and facilities”.
- Noting risks exist as regards potential air and noise pollution aspects but remarking that “mitigation can be seen as possible in all instances.....” •
- [so].....• “there will be a neutral plan-wide impact” •.
- Observing how only 2 of 6 Primary schools in Saffron Walden have capacity for additional places but then bushing this aside as... “infrastructure contributions are likely to alleviate such pressures” •. Overall, we have doubts regarding the intellectual rigour applied. (PSLP2651)

1.2 Sections 36 to 43 inclusive of the Local Plan are not mentioned.

Table 1, Key Local Documents:

- a. The list of documents does not appear in the Local Plan consultation document, and thus the documents listed will not necessarily have been taken into account in responses.
- b. There is a need for absolute consistency in the naming of documents as they appear in the list and on the documents themselves.
- c. There is a need to include the web addresses where documents can be found, particularly those published by Uttlesford District Council.
- d. The list includes Housing Strategy 2012-15 (Uttlesford District Council, 2012). But Uttlesford District Council Housing Strategy 2016-21 is available and included as one of the documents which make up the Local Plan.
- e. The list includes Strategic Housing Market Assessment (2012 [new assessment commissioned expected 2015]). Clearly the note makes little sense in a document published in 2018. In fact, there is a more recent, but less detailed, SHMA dated 2017.

In the circumstances of lack of time and notice, the Parish Council is unable to comment further on the Sustainability Appraisal, but reserves the right to do so later if deemed appropriate. (Elsenham Parish Council; PSLP312)

Scenario B of section 5.3.2 of the SA fails to represent a reasonable alternative for growth as it excluded the main towns within the district. Scenario G; however, which was discounted suggested that three rather than two new settlement be considered. The reference in scenario G to growth in Bishop's Stortford has however, been dropped from the further investigations identified and as such the approach is not justified as the potential for sustainable development at Bishop's Stortford has not been further investigate alongside the three proposed new settlements as a reasonable alternative or as a complimentary approach to help delivery and thereby the effectiveness of the Local Plan. (Bloomhall; PSLP183)

Easton Park alone would eventually have 10,000 dwellings. On the basis that the vast majority would be taken up by persons wishing to escape from London, they are likely to be families. A conservative

estimate would be 3 people per dwelling so more than a 30% increase on the current population. Current transport links and facilities could not cope with this and any proposed improvements such as rail links would only serve to make the area become a suburb of London. (PSLP21)

4.1 The site is assessed under reference THA4 of the emerging Plan's Sustainability Appraisal (SA) and the conclusions are largely positive.

4.2 The site is anticipated to have significant positive impacts on criteria relating to Groundwater Source Protection Zones, Green Belt, Countryside Protection Zones, ancient woodlands, minerals and waste facilities, public safety zones associated with Stansted Airport proximity to public transport, community facilities, delivering affordable housing and avoiding the loss of employment land.

4.3 Positive impacts are identified in relation to the sustainability criteria for the conservation and enhancement of biodiversity, retention of TPOs, historic lanes, pollution, flood risk, cycleways and footpaths, proximity to shopping and a secondary school, PRoWs or bridleways, delivering a suitable housing mix, utilities connectivity and capacity in a nearby secondary school.

4.4 A number of comments are made in response to the assessment scores:

- The SA identifies a significant negative effect for proximity of water bodies, which is attributed when a water body is on the site according to the assessment pro forma. There is no water body on the site, the nearest being the stream within the existing hedgerow on the southeastern border. The Site Location Plan in Appendix 1 confirms this does not fall within the site.
- The SA awards a negative score for the site's moderate to high sensitivity to change taken from UDC's HSCA. As discussed in the SHLAA critique, this assessment does not include a site-specific assessment and the evidence accompanying these representations confirms the site is entirely deliverable with minimal impact. Additionally, a number of other sites, including allocated sites, score negatively against this criterion and therefore sites cannot be ruled out for this reason without compromising the ability of the emerging Plan to deliver the required amount of housing.
- As greenfield land, the site is considered to have significant negative impacts with regards to prioritising the development of brownfield land ahead of greenfield. The lack of available brownfield land to meet housing need requires greenfield land to be allocated. Indeed, the vast majority of sites put forward for consideration are greenfield and limiting development on this basis would fail to deliver sufficient housing to meet local needs. In delivery terms greenfield land is superior to brownfield, with development able to begin without the delay of any demolition or remediation works required which is integral to addressing the lack of a 5-year housing land supply in Uttlesford.
- Negative scores are identified for the site's location outside but adjacent to the settlement boundary and the presence of grade 2 agricultural value of the land as existing. Almost all other sites put forward, with the exception of one, scored negatively or significantly negatively against these criteria meaning the site is one of the better performing options despite receiving a negative score. Sites should not be discounted on this basis as the emerging Plan would be unable to deliver sufficient housing to meet identified need in this location.

- The SA anticipates a negative impact on heritage assets from development of the site but acknowledges that mitigation is possible. The accompanying site-specific evidence confirms that any impact of development on heritage assets would result in the lower end of the less than substantial harm definition and the capacity for mitigation means the site should not be

viewed negatively in this respect.

- A negative score is awarded against flood risk, with the assessment locating the site within Flood Zone 2. This is inaccurate, as the site is entirely within Flood Zone 1. The site should be attributed a significant positive score.

- Negative scores are awarded against criteria for proximity to GP services and a primary school as well as the quality of the potential site access. An appeal decision on Land off Walden Road confirmed the sustainability of the village including accessibility to a wide range of services in line with Thaxted's role as a Key Village. This is discussed further in section 3 below. Access to the site is perfectly achievable through the existing development to the north and the supporting highways note confirms this. The site should therefore not be scored negatively against any of these criteria.

- The SA identifies a negative score against the Accessible Natural Greenspace Standard. All other sites in Thaxted scored the same or worse, including two allocated sites that scored significant negatives. In site selection terms, the site performs well against this criterion compared with alternative sites.

- A significant negative score is provided against the recreational space criterion, which suggests development of the site is expected to result in a loss of recreational space. This is an incorrect assumption as the site is agricultural land is not currently used for recreation.

- The assessment scores the site uncertain for the proposed density of development. The illustrative layout demonstrates that the proposals would sit comfortably within the site and development would seek to align with UDC's density policy as required. This score should be positive for the site.

- Primary school capacity is identified as an issue within the assessment, as is the case for a number of other sites including two allocated sites. Site selection should therefore not be based on the capacity of primary schools otherwise it would not be possible to allocate sufficient sites to meet housing need.

- The site is marked negatively for the distance to main employment areas, along with every other site in Thaxted. Discounting sites for allocation based on this criterion would mean housing need would be unmet in the village.

4.5 Linden Homes requests that the Sustainability Appraisal supporting the emerging Plan is updated to reflect these comments and the evidence presented to support them.

(Linden Homes; PSLP1574)

It is arbitrary and does not adequately support the Spatial Strategy or the selection of sites and

allocations. (PSLP1866)

SP3 – Scale and Distribution

- The SA document unclear and focuses on the reason why all the alternatives were not appropriate rather than why the specified approach was chosen
- The chosen option shows a stepped change in the housing target against a housing requirement of 14,000. No explanation has been given as to why a flat trajectory rather than a stepped trajectory should not be employed. It is unclear if the evaluation of the chosen option is based on a stepped or flat trajectory and there is no specific evaluation of a non-stepped trajectory
- The North Essex Inspector has concluded that the Sustainability Appraisal prepared by the three Local Authorities for their Joint Strategic Plan which underpins the West of Braintree Garden Community allocation is legally flawed, as it has failed to undertake a proper testing of reasonable alternatives development options. Nor is it based upon sound evidence. Given, that the Sustainability Appraisal for the Uttlesford Draft Local Plan has been produced by the same author, and is underpinned by the work undertaken in respect of the Joint Strategic Plan, it follows that it is highly unlikely that the West of Braintree Garden Community element of the Draft Plan is legally compliant (PSLP2216, Stebbing Parish Council)
- The SA does not mention sections 36-43 of the plan (PSLP314, Elsenham Parish Council)
- The SA could be clearer in how it presents background documents (PSLP314, Elsenham Parish Council)
- It is noted that the Sustainability Appraisal for Policy SP3 concludes that there would be significant positive benefits for SA Objective 12 - to provide appropriate housing and accommodation to meet existing and future needs. We disagree with those conclusions, since the stepped trajectory and the use of the 'Liverpool' approach seek to not meet housing needs in the short term and therefore there would be negative effects for SA Objective 12. The alternative option of not applying the stepped trajectory or the 'Liverpool' approach has not been considered or assessed. It is requested that the SA for Policy SP3 is reassessed and includes the alternative option of not applying the stepped trajectory or the 'Liverpool' approach.
- It is requested that the SA for Policy SP3 is reassessed in terms of the effect of the stepped trajectory and the use of the 'Liverpool' approach on SA Objective 12, and that the alternative option of not applying these approaches is also assessed.
- In the Regulation 19 Local Plan Sustainability Appraisal the candidate sites relating to Hatfield Broad Oak are all rejected for various reasons. Site Option 08HBO017 HBO7, which relates to Land North of Hammonds Road, was rejected. The reasoning has been informed by the site consideration in the 2018 SHLAA (Reference 08HBO017). Site 08HBO17 was identified as an allocation after the 2015 call for sites. It appears that the site allocations for Type A villages were already decided by the time this site was put forward, and that this site was not seriously considered as an alternative. Objection is made to Hatfield Broad Oak not being allocated for development (outlined in the table in attached document) based on the above reasons

<ul style="list-style-type: none"> The Sustainability Appraisal and the identification and selection of options is not robust and is arbitrary <p>Linden Homes requests that the Sustainability Appraisal supporting the emerging Plan is updated to reflect these comments and the evidence presented to support them.(Linden Homes; (PSLP1576, PSLP1574)</p>
SP4 – Provision of Jobs
None
SP5 – Garden Community Principles
None
SP6 – Easton Park GC
<p>We consider there are some shortcomings with the sustainability appraisal. Paragraph 7.4.5 of the Sustainability Appraisal itself considers new garden communities and assesses them against the sustainability objectives including objective 4 in relation to the historic environment. The SA concludes uncertain impacts when in our view it is clear that there would be major significant impacts from the development proposed. The SA plays down the potential impact and is therefore somewhat misleading.</p> <p>The sustainability appraisal appears to only consider the dwellings within the garden communities that are likely to come forward during the plan period. It would be helpful if the sustainability appraisal would also consider the full dwelling capacity of these proposed garden communities to assess the suitability (or otherwise) of the proposals in terms of the impact on the historic environment and other facets of sustainable development. For example, Appendix 4 does not consider the full quantum of development currently being considered for each site (eg only 2,500 dwellings at Great Chesterford).(Historic England; PSLP1835)</p>
It is arbitrary and does not adequately support the Spatial Strategy or the selection of sites and allocations. (PSLP1869)
As highlighted in the LEPC representation, the Sustainability Appraisal is inaccurate with respect to Easton Park in a number of material ways and has not been undertaken in a consistent way with other sites. It appears that the evidence has been made to fit the selection of Easton Park. (Stop Easton Park; PSLP2307)
There are a number of inaccuracies and omissions in the appraisal of new settlement options in Sustainability Appraisal in respect of Easton Park. This is a key document in the assessment of the new settlement options as it is the tool used to assist UDC in the selection of Garden Communities across the wider area and the inaccuracies are of a material nature. LEPC contend that the appraisal of Garden Community options (preferred and alternative) within this SA has NOT been undertaken in

a fair and consistent manner and that these errors underplay the sustainability impacts of the Easton Park proposed site. A number of the following points were made in the Regulation 18 consultation but have been ignored by UDC. The following comments relate to Table 87 in the Sustainability Appraisal – Appraisal of New Settlement Options: (see attached for full details) SA Objective 3 and SA Objective 5. (Little Easton Parish Council; PSLP2346)

The Sustainability Appraisal’s assessment of Garden Community Permutations / Options does not demonstrate that there has been adequate assessment of the implications of national aviation policy in respect of the Local Plan and the Easton Park housing allocation. For example, page 261 contains the following inconclusive statement for the SA objective to ‘reduce and control pollution’: “Those options that concentrate new settlements along the A120 corridor will have in contrast uncertain impacts associated with air and noise quality in so far as cumulative negative impacts cannot be ruled out at this stage.” (PSLP1527, Manchester Airport Group)

SP7 - North Uttlesford GC

Transport – Sustainability Appraisal

- It can also be noted that the SA appraisal of the NUGC site from page 213 of the SA gives the site a positive score in regard to sustainable travel despite noting in the commentary that ‘It would also be expected that there would be a large amount of commuting outside the District for jobs would be by car’ (SA Objective 9).
- In regard to SA Objective 13 (Infrastructure) it can be noted that whilst the objective is to ensure the necessary infrastructure is provided to support each new garden community the site selection criteria and the commentary make no reference to the deliverability of transport infrastructure concentrating only on recreation, allotments and utilities provision.
- It is not clear how these impacts have been taken into account and mitigated by the Local Plan.

Landscape – Sustainability Appraisal

- The Sustainability Appraisal (SA) of policy SP7 regarding the NUGC at pages 75/76 states in relation to its landscape / visual and heritage aspects of the policy that ‘the potential for impacts to be significant cannot be ruled out until further details are known’, and that no proposal would be permitted unless it satisfies policy requirements for mitigation. However this assumes that there will be effective mitigations available given that the SA appraisal of the NUGC site in Appendix 1 of the SA (as opposed to the appraisal of policy SP7) identifies significant adverse impacts in regard to landscape and heritage of which there can be no certainty that appropriate mitigation can be achieved.
- In regard to SA objective 7 concerned with pollution it can be noted that the appraisal does not take light pollution into account when the NUGC could be expected to be highly visible on winter evenings and mornings.

Paragraph 152 of the NPPF in regard to plan making states that local planning authorities should seek opportunities to achieve each of the economic, social, and environmental dimensions of sustainable development and states that: ‘Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued’.

However, a number of significant harms regarding the NUGC have been identified in regard to transport and landscape. A revised NUGC development could reduce its harm by avoiding any built development on the north, west and eastern edges of the high plateau, subject to effective landscape mitigations, sensitive street lighting and suitable building heights, and by avoiding built development on the slopes facing towards the A11. This could be achieved by reducing the overall scale of the new settlement to that which could be so accommodated or by amending its southern boundary. The Council does not offer a preference for an alternative site boundary; the issue for South Cambridgeshire District Council is the impact of the current NUGC proposal on its area.

However, possible means by which this could be achieved are by excluding areas from the allocation where built development would cause landscape harm to South Cambridgeshire, or by making clear in the Local Plan the areas where build development could not occur (if those areas are necessary for strategic landscaping or other measures in the allocation). If this resulted in a reduced number of homes, the option to extend the southern boundary of the allocation could be considered. (South Cambridgeshire District Council PSLP2689)

Our R18 LP representation questioned the adequacy of the approach to identifying alternative growth locations in developing the plan. The R19 SA seeks to answer that question by stating that: previously rejected sites were re-considered due to the increased growth requirement arising from the Governments Right Homes in the Right Places consultation; this approach failed to identify sufficient smaller sites, leading to consideration of larger sites on which to develop Garden Communities; and criteria used to identify larger sites were that they should be as self-contained as possible, so it should provide jobs so people have the opportunity to work nearby to where they live and have the ability to sustain a secondary school, and one or more local centres with shops and community facilities.

3.8 This response does not properly address the question which is why the Council considered only sites submitted to them and did not undertake a holistic review of their district to identify the locations that are most appropriate, having regard to landscape and environmental capacity and transport assessments.

3.9 We propose again that the plan should be based on a bottom-up assessment of appropriate locations informed by landscape and environmental capacity and transport assessments. Garden Community selection

3.10 We previously asked whether there is a risk that the selection of the Garden Communities chosen for LP allocations looks pre-determined because the sustainability appraisal does not give

weight to any criteria or draw conclusions about the most sustainable settlement overall.

3.11 The R19 SA states that it does not draw overarching conclusions but presents relevant impacts to the LPA which are not quantifiable, and that it is not the principle evidence base documents on which site allocations and policy approaches should be selected.

However, PPG is clear that Sustainability Appraisals should provide conclusions on the overall sustainability of the different alternatives, including those selected as the preferred approach in the Local Plan and outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives. PPG also provides that Sustainability Assessments also: should inform the selection, refinement and publication of proposals; should identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them; and must consider all reasonable alternatives and assess them in the same level of detail as the option the plan-maker proposes to take forward in the Local Plan (the preferred approach).

3.12 It is therefore not clear why NUGC was selected when: the combined settlement options comprising West of Braintree, Easton Park and Chelmer Mead performed most strongly when assessed against sustainability objectives; and NUGC performs worst or equal-worst in terms of ability to conserve or enhance water quality, conserve or enhance landscape character and townscape, and the ability to maintain or enhance cultural and heritage assets and their settings.

These findings were highlighted in our representation to the R18 LP. The response given in the R19 SA to our questions states that the selection is supported by wider local plan policies that seek to ensure: the mitigation and minimisation of impacts of development; that the selected communities achieved good scores in terms of efficient use of resources and sustainable use of land; and that further details will be provided in the Garden Community Development Plan document (Chapter 3 and Appendix 7).

3.14 Whilst it is recognised that the SA is strategic in nature, it is not clear that the strategy can be properly justified until further detailed assessments are undertaken to understand the ability to mitigate the significant challenges identified in the SA associated with water quality and heritage conservation.

3.15 However, PPG is clear that SAs are important evidence base documents that should inform the proposal selection and refinement and identify the measures envisaged to prevent, reduce and offset likely adverse effects.

There remains a lack of evidence that the challenges previously identified can be mitigated. 3.16 Given the relative performance of the Garden Communities to one another identified in the R18 and R19 SAs, without further information it remains unclear that the settlements selection has been properly justified. (Welcome Trust; PSLP2975)

Defective procedures regarding selection of NUGC site. The NUGC site came forward in 2015 in response to UDC's Call for Sites, and was then subject to critical preliminary assessment by UDC Officers, in regard to which GCPC submitted detailed comments in April 2016 and to which UDC failed to respond. Between that date and early 2017 UDC's assessment of the NUGC site was not subject to any further formal examination, only an internal non-public "iterative process", culminating in an "interim non-statutory Sustainability Appraisal" of the draft Plan "at the Regulation 18 stage".

Failure of UDC to afford GCPC the opportunity to explain further its concerns, and to enable it to participate in UDC's informal review process, wrongly excluded GCPC from proper or effective consultation (see Section 6 and Section 4 paragraph 2.1 to 2.4). NUGC is almost exclusively to serve need of South Cambridgeshire, despite South Cambs District Council at ever stating there is any such requirement, or that it is needed or is justified (see Sections 4, 6 and 7). 3.1.2 it has not been prepared or based on a strategy which seeks to meet infrastructure requirements: 3.1.2.1 as set out in Sections 2, 4, 5 and 7 the infrastructure requirements of NUGC are adding to, rather than solving, infrastructure requirements of the District. 5,000 houses in the selected location are not sustainable, and the as yet unknown and uncounted mitigation measures required cannot be demonstrated to be deliverable.

The June 2018 UDC Infrastructure Delivery Plan is almost all one needs to read in this regard. The phrase unknown at this time is features so heavily in the "Annex schedule - Garden Communities and Settlements" in relation to NUGC it is self-evident any strategic infrastructure think is still far, far from where it needs to be.

3.1.3 in preparing the draft Plan, UDC has failed adequately to consider inclusion of unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development: 3.1.3.1 as set out in Sections 2 and 4, and elsewhere in this Response, Policy SP7 will simply serve to provide workers in South Cambridgeshire, Cambridge City and London with a place in which to live; it does not address Uttlesfords housing needs, whether objectively assessed or otherwise. 3.2 The draft Plan is not Justified: 3.2.1 the draft Plan is not the most appropriate strategy when considered against the reasonable alternatives based on proportionate evidence.

4.1.10 It is noted that the Sustainability Appraisal considers no impacts to arise from this policy in

terms of SEA objectives 6 (climatic change) and 7 (pollution). In terms of SEA objectives 9 (sustainable transport) and 12 (meeting housing needs) no impacts are predicted over the short to medium term, with significant impacts in the long term. However, for the reasons set out above, it is unclear how such an assessment can be made in light of the evidence available. (Great Chesterford Parish Council; PSLP2316)

It is unclear that the numbers of houses needed is correct they appear to be based on a 93% uplift over baseline growth on the sole grounds of need for employment Stansted Airport. (PSLP2078 & PSLP2341; Little Chesterford Parish Council)

UDCs own Sustainability Appraisal (SA) of Policy SP7 relating to NUGC says about the site that significant impacts resulting from landscape, visual and heritage aspects of the Policy cannot be ruled out until further details are known, and that proposals will not be permitted unless requirements for mitigation are met. This assumes effective mitigations are possible. We believe that such mitigations cannot be found in relation to this particular site.

Appendix 1 of the SA indeed identifies significant adverse impacts in relation to landscape (and heritage). The SA states there can be no certainty that appropriate mitigation can be achieved. We say the inclusion of NUGC in the Local Plan means it cannot be justified and has not been positively prepared. There is no sign that reasonable alternatives to NUGC have been considered which would have a reduced impact on the landscape. (Ickleton Parish Council; PSLP2975)

[The North Essex Inspector also raised the point that the assessment of the chosen spatial strategy against alternatives that do not include garden communities had generally made optimistic assumptions about the benefits of garden communities, and correspondingly negative assumptions about the alternatives, without evidence to support many of those assumptions.

As a result, the Inspector's letter stated, "these assessments lack the necessary degree of objectivity and are therefore unreliable". Appendix 5 of the Uttlesford Regulation 19 Sustainability Appraisal makes the comparison between "traditional approaches" vs new "garden communities". Whilst it is appreciated that this is a somewhat theoretical assessment, it would appear that this is written to give the impression that garden communities are a much more preferable option. For every criterion "garden communities" score better than "traditional approaches", which simply cannot be the case if an objective view is taken.

The assessment scores new settlements a "+" and traditional approaches "?" for encouraging sustainable patterns of development which does not appear to be fair, when existing infrastructure and services will be in place in existing settlements and in garden communities everything is starting from scratch and likely to be phased. Also In relation to providing appropriate housing and accommodation to meet existing and future needs, again new settlements are scored as a "++"

whereas traditional approaches only a "+". What the assessment of this criteria clearly fails to consider is issues such as meeting needs where they arise or preventing households breaking up and having to move away to satisfy their housing needs, which must form a key social component

of the assessment criteria.

There are a number of instances which question the objectivity of this assessment, which have knock on effects for the remainder of the assessment of the Strategic Options and needs to be reassessed more objectively.

4.1 The site is assessed under reference THA4 of the emerging Plan's Sustainability Appraisal (SA) and the conclusions are largely positive.

4.2 The site is anticipated to have significant positive impacts on criteria relating to Groundwater Source Protection Zones, Green Belt, Countryside Protection Zones, ancient woodlands, minerals and waste facilities, public safety zones associated with Stansted Airport proximity to public transport, community facilities, delivering affordable housing and avoiding the loss of employment land.

4.3 Positive impacts are identified in relation to the sustainability criteria for the conservation and enhancement of biodiversity, retention of TPOs, historic lanes, pollution, flood risk, cycleways and footpaths, proximity to shopping and a secondary school, PRoWs or bridleways, delivering a suitable housing mix, utilities connectivity and capacity in a nearby secondary school.

4.4 A number of comments are made in response to the assessment scores:

- The SA identifies a significant negative effect for proximity of water bodies, which is attributed when a water body is on the site according to the assessment pro forma. There is no water body on the site, the nearest being the stream within the existing hedgerow on the southeastern border. The Site Location Plan in Appendix 1 confirms this does not fall within the site.

- The SA awards a negative score for the site's moderate to high sensitivity to change taken from UDC's HSCA. As discussed in the SHLAA critique, this assessment does not include a site-specific assessment and the evidence accompanying these representations confirms the site is entirely deliverable with minimal impact.

Additionally, a number of other sites, including

allocated sites, score negatively against this criterion and therefore sites cannot be ruled out for this reason without compromising the ability of the emerging Plan to deliver the required amount of housing.

- As greenfield land, the site is considered to have significant negative impacts with regards to prioritising the development of brownfield land ahead of greenfield. The lack of available brownfield land to meet housing need requires greenfield land to be allocated. Indeed, the vast majority of sites put forward for consideration are greenfield and limiting development on this basis would fail to deliver sufficient housing to meet local needs. In delivery terms greenfield land is superior to brownfield, with development able to begin without the delay of any demolition or remediation works required which is integral to addressing the lack of a 5-year housing land supply in Uttlesford.
- Negative scores are identified for the site's location outside but adjacent to the settlement boundary and the presence of grade 2 agricultural value of the land as existing. Almost all other sites put forward, with the exception of one, scored negatively or significantly negatively against these criteria meaning the site is one of the better performing options despite receiving a negative score. Sites should not be discounted on this basis as the emerging Plan would be unable to deliver sufficient housing to meet identified need in this location.
- The SA anticipates a negative impact on heritage assets from development of the site but acknowledges that mitigation is possible. The accompanying site-specific evidence confirms that any impact of development on heritage assets would result in the lower end of the less than substantial harm definition and the capacity for mitigation means the site should not be viewed negatively in this respect.
- A negative score is awarded against flood risk, with the assessment locating the site within Flood Zone 2. This is inaccurate, as the site is entirely within Flood Zone 1. The site should be attributed a significant positive score.
- Negative scores are awarded against criteria for proximity to GP services and a primary school as well as the quality of the potential site access. An appeal decision on Land off Walden Road¹ confirmed the sustainability of the village including accessibility to a wide range of services in line with Thaxted's role as a Key Village. This is discussed further in section 3 below. Access to the site is perfectly achievable through the existing development to the north and the supporting highways note confirms this. The site should therefore not be scored negatively against any of these criteria.
- The SA identifies a negative score against the Accessible Natural Greenspace Standard. All other sites in Thaxted scored the same or worse, including two allocated sites that scored significant negatives. In site selection terms, the site performs well against this criterion compared with alternative sites.
- A significant negative score is provided against the recreational space criterion, which suggests development of the site is expected to result in a loss of recreational space. This is an incorrect assumption as the site is agricultural land is not currently used for recreation.

<ul style="list-style-type: none"> ● The assessment scores the site uncertain for the proposed density of development. The illustrative layout demonstrates that the proposals would sit comfortably within the site and development would seek to align with UDC's density policy as required. This score should be positive for the site. ● Primary school capacity is identified as an issue within the assessment, as is the case for a number of other sites including two allocated sites. Site selection should therefore not be based on the capacity of primary schools otherwise it would not be possible to allocate sufficient sites to meet housing need. ● The site is marked negatively for the distance to main employment areas, along with every other site in Thaxted. Discounting sites for allocation based on this criterion would mean housing need would be unmet in the village.
<p>Housing requirement of 14,600 dwellings (2011 to 2033) not based on a sound assessment of housing needs for the Housing Market Area. The level of delivery will lead to a considerable shortfall in housing supply (Persimmon; PSLP2672;)</p>
<p>UDC housing supply of 14,712 falls 258 units below its 14,000 dwelling requirement if West of Braintree GC does not happen/If other two garden communities do not happen or are delayed then the Council will fall well below its housing requirements. The Council must seek to improve its housing supply position (Chase New Homes; PSLP2197)</p>
<p>Put focus on delivering the other two garden villages, which are nearer UDCs employment locations and main road network (A120)/allocate some smaller sites across the district that come forward quicker than garden villages/provide custom build plots St Edmunds Lane Management Limited (PSLP1809)</p>
<p>Policy SP7 to highlight the potential opportunity for improved train services at Great Chesterford as a result of Crossrail 2 and how this could help enable development and increase sustainable travel options in the proposed new garden community (Transport for London PSLP2117)</p>
<p>Object to NUGC which will have an irreversibly negative impact on the landscape as well as resulting in significant congestion on the local highways network. The site scored poorly against a number of the Sustainability Appraisal Objectives identified in the Sustainability Appraisal, which suggests the site is not a sustainable location for new growth.</p> <p>Key issues identified include the negative impact the development of the site could have on; water quality, the landscape, the areas heritage assets, the potential for contamination and poor bus links. The location of this new settlement in the north of the District close to Cambridge will arguably result in this scheme meeting the housing needs of Cambridge more than Uttlesford (The Crown Estate; PSLP2750).</p>
<p>All three of UDC's garden villages are at the top of the range examined by Lichfields in terms of housing numbers and far exceed 2,000 units. The Lichfields evidence suggests that the timescales for obtaining planning approval on a site of this size is likely to be in excess of four years. Therefore the</p>

<p>timescales indicated by UDC in their Local Plan seem even more unlikely. Again this points towards why significantly more housing is required from additional allocated sites in the early part of the plan period. (Village Developments Takeley; PSLP2915)</p>
<p>Whilst principle of Garden Communities in addressing housing need is valid may not be effective given reliance on 60% modal shift (Grant and Bloor; PSLP2899)</p>
<p>Fulfils the housing needs of the Cambridge housing market rather than the West Essex and East Herts market (Trustee of N Streeter Will Trust; PSLP2867)</p>
<p>Landscape impact - the settlement is a apparently being designed to mitigate the impact on the Great Chesterford but it will be highly visible from South Cambridgeshire and from the opposite side of the environmentally sensitive Cam Valley (Looking from Strehall/Catmere End), even if building is mainly on the plateau. It will permanently destroy the uplands, the sky-line, good quality agricultural land and add to urbanisation of what is currently essentially a rural landscape which is acknowledged to have high sensitivity to change. Historically, settlements in this area have always been in the valley, not on hills either side. The proposals will offend the natural order of the Cam Valley, developed over millennia. The proposed settlement will destroy any of the current green belt between the suburbs of southern Cambridge and the rural villages of South Cambs/Uttlesford and will create a huge area of ribbon development stretching from Great Chesterford to Cambridge.(Clive Hopewell PSLP577)</p>
<p>This proposal builds on good agricultural land for no good reason. Second, this area depends on groundwater supplies which are replenished by rainwater percolating through permeable rocks. Thus, aquifer recharge areas should be protected from building in order to ensure sustainable water supplies. However well designed water recycling is on a site, building on aquifer recharge zones means that there is going to be an element of loss of recharge and a concomitant tendency to increase runoff and flooding (PSLP603 Dr S Trudgill)</p>
<p>SP8 – West of Braintree GC</p>
<ul style="list-style-type: none"> • Planning Inspector Clews, re Braintree DC plan Jan 2018 has stated that the SA fails to justify the choices made and that it has not been demonstrated that the chosen spatial strategy is the most appropriate one when considered against the reasonable alternatives, as the tests of soundness require. (Individuals) (PSLP3007 Stebbing Neighbourhood Plan Group) • Unclear why this option was chosen and how the alternatives compared (PSLP761 M Frost) (PSLP828 S Baugh) • It is arbitrary and does not adequately support the Spatial Strategy or the selection of sites and allocations. (PSLP1864 Edward Gittins) • SA fails to justify the choices made and that it has not been demonstrated that the chosen spatial strategy is the most appropriate one when considered against the reasonable alternatives. As the Regulation 19 SA has been undertaken by the same organisation as the North Essex Section 1 Plan and relies wholly upon the West of Braintree Garden Community to be extended into Uttlesford, it is clearly seriously flawed and unsound for the principal reasons and shortcomings identified by the Inspector. (PSLP902 Bloor Homes) • There is a risk that the Garden Communities will perpetuate car borne out-commuting and not deliver the modal shift referred to in the Local Plan. This is also referred within the Sustainability Appraisal which concludes “it would also be expected that there would be a large amount of commuting outside of the district for jobs would be by car. “ (PSLP2674 Persimmon Homes)

- Serious misgivings about the content and evidence base underpinning the Sustainability Appraisal and the suitability of the area identified for the construction of a new garden community. Inadequate regard has been had to the potential heritage and landscape impacts of the proposal upon Stebbing Parish. Critically, we consider that the SA is fatally flawed and needs to be recommissioned. It is totally inappropriate to explore options at the Regulation 19 stage instead of carefully assessing and evaluating them at the earlier Regulation 18 stages, when key decisions regarding the Plan's overall strategy were taken regarding the selection of alternatives. It is notable that the Uttlesford SA has been undertaken by the same author (Essex Place Services) as that prepared in respect of the Joint North Essex Strategic Plan. The Joint examination Inspector has already identified serious flaws regarding the rigour of the testing of alternatives, and suggested that a new SA be undertaken by a different entity. (PSLP2206 Stebbing PC)
- Having reviewed the Local Plan and the accompanying Sustainability Appraisal, it is not clear if, or how, the Council has considered issues relating to the airports operation or national aviation policy in respect of the Local Plan and the west of Braintree housing allocation. This assessment needs to be undertaken in detail before the plan should progress, in order that interested parties can review and comment accordingly. (PSLP1514 Manchester Airport Groups)
- The SA has considered two additional settlement alternatives when compared to the Regulation 18 SA. However the selection of these alternatives does not appear to have given consideration to whether a different number of settlements could better deliver the housing requirement. Instead they have considered the suitability of a different number of settlements to deliver two vastly different housing figures. It is not clear why a strategy that does not seek to meet the District's full housing need would be included as a realistic alternative, whereas a strategy that distributes the development required to meet the District's housing need differently would not be assessed as an alternative.
Consider that there might be a risk that the selection of the Garden Communities look pre-determined because the sustainability appraisal does not give weight to any criteria or draw conclusions about the most sustainable settlement overall. The R19 SA states that it does not draw overarching conclusions but presents relevant impacts to the LPA which are not quantifiable, and that it is not the principle evidence base documents on which site allocations and policy approaches should be selected. This is contrary to PPG. (PSLP2977 Welcome Trust)
- Quotes from West of Braintree Garden Communities Plan: Issues and Options Consultation (Regulation 18) Draft Sustainability Appraisal (SA): Scoping & Environmental Report – November 2017 Sustainability Appraisal / Strategic Environmental Assessment in relation to Utilities. (PSLP3 & 16 D McBride / PSLP1569/2119/2123 P Bloom)
- The following should be identified through the SA To address recreational disturbance / pressure impacts from development on coastal SPAs and SACs, contributions will be secured towards mitigation measures identified in the Essex wide Recreational Disturbance Avoidance and Mitigation Strategy (RAMs) which will be completed by the time the Local Plan is adopted. The development is within the likely zone of influence (ZoI) for potential air quality impacts, through increased traffic levels, to Epping Forest SSSI, SAC. The policy must recognise this and include a requirement for implementation of any measures identified as necessary, through the Epping Forest MoU study, to address air quality impacts to the SSSI/SAC. The policy should specify a funding mechanism for the delivery of the agreed measures and any measures required to address impacts to the nearby River Ter and Bovington Hall Woods SSIs. (PSLP2455 Natural England)
- Disagree with the SA's assessment of the garden communities against sustainability objectives including objective 4 in relation to historic environment. The SA concludes uncertain impacts when in our view it is clear that there would be major significant impacts from the development proposed. The SA plays down the potential impact and is therefore somewhat misleading. The sustainability appraisal appears to only consider the dwellings within the garden communities that are likely to come forward during the plan period. It would be helpful if the sustainability

<p>appraisal would also consider the full dwelling capacity of these proposed garden communities to assess the suitability (or otherwise) of the proposals in terms of the impact on the historic environment and other facets of sustainable development. (PSLP1855 Historic England)</p>
<p>SP9 – Development within Development Limits</p>
<p>None</p>
<p>SP10 – Protection of the Countryside</p>
<ul style="list-style-type: none"> The SA focuses on too much reliance on the 3 garden community sites. (Go Holdings Ltd PSLP 2704)
<p>SP11 – London Stansted Airport</p>
<p>None</p>
<p>SP12 – Sustainable Development Principles</p>
<p>None</p>
<p>4. Housing</p>
<p>Part 5.4.6 of the SA on Policy H6 does not justify why clusters of affordable housing units are restricted to such low numbers as set out in paragraph 4.23 of the Local Plan. (PSLP2562 Bovis Homes)</p>
<p>H1 to H12</p>
<p>Disagree with the comments and recommendations made in the SA for Policy H10. (PSLP738 Susan Johnson)</p>
<p>5. Employment, Appendix 5, 6</p>
<p>The Easton Park Development proposal of 10,000 new households is unsustainable because it is remote from the M11 junction 8, there is no local station, nor cycleway to it and the pedestrian routes to the nearest station are unsafe and actively discouraged by Manchester Airport Authority.</p> <p>History on this point is not good MAA will not permit the large waste and aggregate lorries, that do employ local people, to join Thremhall Avenue at Coopers End Roundabout. These lorries are forced to drive further, wait at the traffic lights at The Four Ashes junction and they currently power through the villages of Takeley, Takeley Street in order to join the M11 or head west.</p> <p>The Local Plan should address issues like this on behalf of local people. Further expansion of the airport and growth should be linked to resolving issues like this rather than compounding them with any increase in building...which will require aggregate to be delivered and all other construction materials purchased locally and travelling from the North of Takeley. Why build houses in a town format when there are no jobs, poor co-operation between the existing employers and a compulsion to encourage car use to the detriment of local people already living in the area.</p>

Small developments are needed scattered around the Uttlesford District and if multiple occupancy homes are to be built, there should be an assumption that they will be within easy walking distance of Great Chesterford, Wendens Ambo, Newport Elsenham and Stansted Mountfitchet Stations and the two accessible M11 junctions to the north and south of the District where the cycleway has been improved already; as part of a £800000 project, a one mile stretch was upgraded. (PSLP867)
5 Employment
EMP1
It is not clear from para 5.41 what level of employment is anticipated or planned for North Stansted Employment Area or how this has been allowed for within traffic forecasts, for example, through Elsenham, Stansted Mountfitchet and M11 J8. (PSLP920)
EMP2 – EMP4
None
6. Retail, Appendix 5
Introduction
None
RET1
<ul style="list-style-type: none"> • The question concerning the Sustainability Appraisal is no mentioned in the guidance notes, the web page and in the Plan; • Being unaware of the SA question, Elsenham Parish Council did not consider the SA when it met to determine the response to the Regulation 19 Local Plan. It is noted that the SA comprises 590 pages, in addition to Annexes A, B and C totalling 232 pages, and a Non-Technical Summary of 57 pages. • In the very limited time available, it has been possible to make only a cursory review of the Non-Technical Summary. The following comments are offered: <ul style="list-style-type: none"> ○ 1.2 Sections 36 to 43 inclusive of the Local Plan are not mentioned. ○ Table 1, Key Local Documents: <ul style="list-style-type: none"> a. The list of documents does not appear in the Local Plan consultation document, and thus the documents listed will not necessarily have been taken into account in responses. b. There is a need for absolute consistency in the naming of documents as they appear in the list and on the documents themselves. c. There is a need to include the web addresses where documents can be found, particularly those published by Uttlesford District Council. d. The list includes Housing Strategy 2012-15 (Uttlesford District Council, 2012). But Uttlesford District Council Housing Strategy 2016-21 is available and included as one of the documents which make up the Local Plan. e. The list includes Strategic Housing Market Assessment (2012 [new assessment commissioned expected 2015]). Clearly the note makes little sense in a document published in 2018. In fact, there is a more recent, but less detailed, SHMA dated 2017. <p>Due to lack of time and notice, the Parish Council is unable to comment further on the Sustainability</p>

Appraisal, but reserves the right to do so later if deemed appropriate. (Elsenham Parish Council PSLP 276)
RET2 to RET5
None
7. Transport
TA1 to TA4
None
8. Infrastructure
INF1 to INF4
None
9. Design
Introduction
None
D1
<ul style="list-style-type: none"> I did not know this question would appear. There has been no mention of the Sustainability Appraisal previously. It is not easy to find. The Guidance Notes don't help, and they don't say where it is either.(PSLP 384)
D2
<ul style="list-style-type: none"> The Sustainability Appraisal makes no meaningful comments or recommendations on the subject of car parking design.(PSLP 701)
<ul style="list-style-type: none"> The question concerning commenting on the Sustainability Appraisal is not included in the guidance notes, web page and the plan itself. Elsenham Parish did not therefore consider the SA question due to length of the SA document comprising 590 pages, in addition to Annexes A, B and C totalling 232 pages, and a Non-Technical Summary of 57 pages. Due to the very limited time available, only a cursory review of the Non-Technical Summary was undertaken. The following comments are offered: <ul style="list-style-type: none"> 1.2 Sections 36 to 43 inclusive of the Local Plan are not mentioned. Table 1, Key Local Documents: <ol style="list-style-type: none"> The list of documents does not appear in the Local Plan consultation document, and thus the documents listed will not necessarily have been taken into account in responses. There is a need for absolute consistency in the naming of documents as they appear in the list and on the documents themselves. There is a need to include the web addresses where documents can be found, particularly those published by Uttlesford District Council. The list includes Housing Strategy 2012-15 (Uttlesford District Council, 2012). But Uttlesford District Council Housing Strategy 2016-21 is available and included as

one of the documents which make up the Local Plan. e. The list includes Strategic Housing Market Assessment (2012 [new assessment commissioned expected 2015]). Clearly the note makes little sense in a document published in 2018. In fact, there is a more recent, but less detailed, SHMA dated 2017.
<ul style="list-style-type: none"> • Due to lack of time and notice, the Parish Council is unable to comment further on the Sustainability Appraisal, but reserves the right to do so later if deemed appropriate. (Elsenham Parish Council PSLP 289)
D3 to D5
None
D6
<ul style="list-style-type: none"> • The question concerning commenting on the Sustainability Appraisal is not included in the guidance notes, web page and the plan itself. • Elsenham Parish did not therefore consider the SA question due to length of the SA document comprising 590 pages, in addition to Annexes A, B and C totalling 232 pages, and a Non-Technical Summary of 57 pages. • Due to the very limited time available, only a cursory review of the Non-Technical Summary was undertaken . The following comments are offered: • 1.2 Sections 36 to 43 inclusive of the Local Plan are not mentioned. • Table 1, Key Local Documents: <ul style="list-style-type: none"> f. The list of documents does not appear in the Local Plan consultation document, and thus the documents listed will not necessarily have been taken into account in responses. g. There is a need for absolute consistency in the naming of documents as they appear in the list and on the documents themselves. h. There is a need to include the web addresses where documents can be found, particularly those published by Uttlesford District Council. i. The list includes Housing Strategy 2012-15 (Uttlesford District Council, 2012). But Uttlesford District Council Housing Strategy 2016-21 is available and included as one of the documents which make up the Local Plan. j. The list includes Strategic Housing Market Assessment (2012 [new assessment commissioned expected 2015]). Clearly the note makes little sense in a document published in 2018. In fact, there is a more recent, but less detailed, SHMA dated 2017. • Due to lack of time and notice, the Parish Council is unable to comment further on the Sustainability Appraisal, but reserves the right to do so later if deemed appropriate. (Elsenham Parish Council PSLP 277)
D7
<ul style="list-style-type: none"> • The question concerning commenting on the Sustainability Appraisal is not included in the guidance notes, web page and the plan itself. • Elsenham Parish did not therefore consider the SA question due to length of the SA document comprising 590 pages, in addition to Annexes A, B and C totalling 232 pages, and a Non-Technical Summary of 57 pages. • Due to the very limited time available, only a cursory review of the Non-Technical Summary was undertaken . The following comments are offered: • 1.2 Sections 36 to 43 inclusive of the Local Plan are not mentioned. • Table 1, Key Local Documents:

<ul style="list-style-type: none"> a) The list of documents does not appear in the Local Plan consultation document, and thus the documents listed will not necessarily have been taken into account in responses. b) There is a need for absolute consistency in the naming of documents as they appear in the list and on the documents themselves. c) There is a need to include the web addresses where documents can be found, particularly those published by Uttlesford District Council. d) The list includes Housing Strategy 2012-15 (Uttlesford District Council, 2012). But Uttlesford District Council Housing Strategy 2016-21 is available and included as one of the documents which make up the Local Plan. e) The list includes Strategic Housing Market Assessment (2012 [new assessment commissioned expected 2015]). Clearly the note makes little sense in a document published in 2018. In fact, there is a more recent, but less detailed, SHMA dated 2017. <ul style="list-style-type: none"> • Due to lack of time and notice, the Parish Council is unable to comment further on the Sustainability Appraisal, but reserves the right to do so later if deemed appropriate. (Elsenham Parish Council PSLP 278)
<p>D8</p>
<ul style="list-style-type: none"> • The plan acknowledges that 'Climate change is a global issue which has the potential to have significant environmental, social and economic impact on the UK. However, the wording of policies is weak and inconsistent with government policy whose national target is zero. <ul style="list-style-type: none"> – The plan then continues in 9.26 to give itself 'let out clauses': ' In setting out these policies, the Council is mindful that that the Government’s Planning Practice Guidance allows latitude for local plans to set local requirements for sustainability targets subject to normal conventions relating to viability.' – How is Viability defined? Viability for the developer within his current profit margins? Or viable for future generations in the years ahead over the lifetime of the development? Government guidance on viability states that: 'Plans should set out circumstances where review mechanisms may be appropriate, as well as clear process and terms of engagement regarding how and when viability will be reassessed over the lifetime of the development to ensure policy compliance and optimal public benefits through economic cycles. (PSLP 666)
<ul style="list-style-type: none"> • Policy D8 lacks commitment to energy reduction measures; • The plan does not take into consideration the massive reduction in the costs of energy efficiency measures which has been exponential. The same is true of other systems of air source heat pumps, energy reclamation from bath/shower water etc. As developers are led by planners to adopt this measure en masse, the prices will reduce accordingly. • The council should be showing the leadership needed to get us further into, and take advantage of, this virtuous economic circle. • To be sustainable, our assessment of affordability and viability should also extend over the lifetime of the development. There is no point saving money now, only for our children to be saddled with a massive bill in the years ahead. Yet this is what we repeatedly do. (PSLP 146)
<p>D9</p>
<ul style="list-style-type: none"> • D9 Minimising Carbon Emissions. This policy sounds worthwhile and sets out 4 clear requirements which are followed by the phrase 'These requirements will apply unless it can be demonstrated that they would make the development unviable.' I imagine that every developer will do his/her best to demonstrate that they are unviable in order to maximise profits. What protection is there in this plan against that? To be sound, the plan should set out a vision and expectations that will be robust enough to defend against developers who

are seeking to cut costs at the expense of sustainability - making future generations pay. (PSLP 146)
D10
None
10. Environment
EN1 to EN6
None
EN7
1. 2. Sustainability Appraisal The sustainability appraisals for this Local Plan has not taken into account, or properly addressed, overall declines in protected species (e.g. bat) populations, locally or (where nationally scarce) nationally
EN8 – EN9
None
EN10
The SA is difficult to interpret on the subject of surface water flooding and watercourses. (PSLP703)
EN11
<p>1.2 Sections 36 to 43 inclusive of the Local Plan are not mentioned.</p> <p>Table 1, Key Local Documents:</p> <p>a. The list of documents does not appear in the Local Plan consultation document, and thus the documents listed will not necessarily have been taken into account in responses.</p> <p>b. There is a need for absolute consistency in the naming of documents as they appear in the list and on the documents themselves.</p> <p>c. There is a need to include the web addresses where documents can be found, particularly those published by Uttlesford District Council.</p> <p>d. The list includes Housing Strategy 2012-15 (Uttlesford District Council, 2012). But Uttlesford District Council Housing Strategy 2016-21 is available and included as one of the documents which make up the Local Plan.</p> <p>e. The list includes Strategic Housing Market Assessment (2012 [new assessment commissioned expected 2015]). Clearly the note makes little sense in a document published in 2018. In fact, there is a more recent, but less detailed, SHMA dated 2017.</p> <p>In the circumstances of lack of time and notice, the Parish Council is unable to comment further on the Sustainability Appraisal, but reserves the right to do so later if deemed appropriate. (Elsenham</p>

Parish Council; PSLP337)
EN12 to EN14
None
EN15
<ul style="list-style-type: none"> The large number of houses suggested for the developments are due to the choice of the developer led solution. The majority of houses built will therefore be built for profit and will not be affordable for local people. This large number of dwellings will vastly increase traffic on local roads which will exacerbate air pollution. Therefore the proposed number of houses will not be sustainable in relation to the health and wellbeing of residents. (PSLP1523)
EN16 to EN18
None.
11. Countryside
Introduction
<ul style="list-style-type: none"> It is not sustainable to plonk thousands of houses down in the countryside when most of the people coming to live there will be racing through said former countryside to get somewhere else for their jobs.(PSLP 49)
C1 to C4
None
12-35. Site Allocations
<p>Elsenham</p> <ul style="list-style-type: none"> Disagree with the assessment made of sites reference ELS6-land west of Station Road and ELS7-land north of Stansted Road, Elsenham. (PSLP2761 Crown Estates) <p>Felsted</p> <ul style="list-style-type: none"> Concerned with soundness and compliance with SEA regulations. Distribution strategy is inconsistent with spatial vision of maintaining and enhancing the vitality and viability of towns and villages. There is a lack of assessment of land at Braintree Road and Land east of Chelmsford Road Felsted as reasonable alternatives. To dismiss the site because planning permission has been refused and an appeal dismissed should not be a factor in assessing suitability of a site which should be based on the evidence within the SA. (PSLP2873 Catesby) <p>Newport</p> <ul style="list-style-type: none"> Disagree with the assessment of site reference New11-Land to the south of Wicken Road, Newport. (PSLP2784 Countryside) <p>Stansted Mountfitchet</p> <ul style="list-style-type: none"> SA fails to justify the choices made and that it has not been demonstrated that the chosen

<p>spatial strategy is the most appropriate one when considered against the reasonable alternatives. As the Regulation 19 SA has been undertaken by the same organisation as the North Essex Section 1 Plan and relies wholly upon the West of Braintree Garden Community to be extended into Uttlesford, it is clearly seriously flawed and unsound for the principal reasons and shortcomings identified by the Inspector. (PSLP903 Bloor Homes)</p> <p>Thaxted</p> <ul style="list-style-type: none"> • The SA has not assessed land to the south of Sampford Road promoted through the Call for Sites, as an alternative development. (PSLP2779 Countryside Properties) • Disagree with the assessment made for reference THA4- Land east of Wedow Road (land off Cophall Lane). (PSLP2879 Linden Homes)
CLA 1 – GtDUN 3
None
GtDUN 4
<ul style="list-style-type: none"> • Fully support the conclusions of the SA in relation to this site subject to a number of clarifications. (PSLP2874 Lindon Homes)
<ul style="list-style-type: none"> • GtDUN 5 – THA 3
None
36. Delivery and Monitoring
None
M1 – M2
None
37. Glossary
None
38. Appendix 1 Replacement Policies
None
39. Appendix 2 Monitoring Framework
None
40. Appendix 3 Housing Trajectory
None
41. Appendix 4 Garden Community Principles
None

42. Appendix 5 Marketing Assessment Information
None
43. Appendix 6 Existing Employment Sites Schedule
None
44-115 Appendix 7 Inset Maps
None