

<u>Uttlesford District Council Regulation Regulation 19 Local Plan Summary of Representations for the Addendum of Focussed Changes of the Regulation 19 Local Plan</u>	
FOCUSSED CHANGE 1	Summary of Responses
SUPPORT	1
OBJECT	15
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • North Essex Garden Communities Ltd (NEGC Ltd) was established to deliver the Garden Community proposals contained in the shared strategic Section 1 of the Braintree District Council, Colchester Borough Council, and Tendring District Council Local Plans which includes the proposal for the West of Braintree Garden Community. The company is wholly and equally owned by the aforementioned three district authorities as well as Essex County Council. In response to the consultation NEGC Ltd objects to Focussed Changes 1-6, and Focussed Change 9 of the Addendum of Focussed Changes to the Uttlesford District Council Local Plan (Reg 19) on the grounds that the changes are not necessary to make the plan effective and are therefore unjustified. Â NEGC Ltd considers the West of Braintree Garden Community as being fully achievable and presenting no elevated risks to delivery as is stated in the Focussed Changes. In order to elucidate these grounds for objection NEGC Ltd would like to be afforded the opportunity to submit evidence for consideration at the Examination, as well as provided with the opportunity to appear at the relevant Examination hearing sessions. (Colchester Borough Council; PSLPA157) • Focussed change 1 represents a sound approach providing greater clarity and certainty about the sources of supply of housing proposed within Uttlesford District, for the Plan period to 2033 through Policy SP3 (The Scale and Distribution of Housing). 'Focussed change 1 confirms, through more prescriptive wording, that 11 settlement locations including three Garden Communities shall deliver some 6,380 of the planned 14,600 dwellings for the Local Plan period 2011 to 2033. Both the Easton Park and North Uttlesford Garden Communities are identified by policy SP3 as delivering the greatest number of dwellings by 2033 (1,925 at each Garden Community). The next largest settlement locations contribute towards delivery of 14,600 dwellings are the West of Braintree Garden Community and Great Dunmow for 970 and 767 dwellings respectively. There is an element of risk that non delivery of any or a number of the dwellings at any of the locations listed by policy SP3 will prevent the total housing requirement of 14,600 dwellings being delivered within Uttlesford within the Plan period to 2033. The event of non- delivery or delayed delivery of housing at any of the three planned Garden Communities would provide the greatest potential impact to the Authority meeting the 14,600 dwelling target by 2033. (GL Hearn; PSLPA229)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • These elevated risks however fundamentally undermine the purpose of the strategic policy and the proposed wording highlights concerns raised in the Reg 19 Representations on the

	<p>timescales for delivering the garden communities. Changing the wording effectively recognises that there is not certainty over housing delivery and presents an unacceptable loosening of the councils commitment to delivery. (Iceni Projects; PSLPA 32)</p> <ul style="list-style-type: none"> • The wording implies that development will come forward with a degree of certainty. That is what a sound Local Plan should achieve, if it is to be positively prepared. The amended wording i.e. "The plan is to deliver" is markedly weaker in this respect. It is fair to plan for growth but it is essential to achieve that growth. (PSLPA 117; Pegasus Planning Group) • There is a significant risk that the proposed new settlement known as the West of Braintree Garden Community (WoB GC) will not deliver new homes within Uttlesford in the plan period. It is not considered that the commitment to an early Local Plan Review is appropriate to address what are reasonable concerns regarding the deliverability of this site within Uttlesford in the plan period. With reference to the NEAs Inspector's letter of 8th June 2018, the concerns are of sufficient gravity that they cannot simply be dismissed by insertion of a commitment to an early review, if they are sufficient to warrant the NEAs Inspector concluding that they would render those Plans unsound, then the Uttlesford element of the WoB GC should be deleted from the emerging Uttlesford Local Plan until those concerns are resolved, and additional sites should be identified in the emerging Uttlesford Local Plan. (Countryside Properties LTD; PSLPA164) • Housing Trajectory and 5 Year Housing Land Supply Statement (October 2018) The District Council has published an updated Housing Trajectory and 5 Year Housing Land Supply Statement (October 2018), albeit this was not included as part of the Regulation 19 Local Plan Addendum suite of documents the subject of the current consultation. This document comprises a revised trajectory and an update on Uttlesford's 5 year housing land supply, which includes an assessment of supply following the anticipated adoption of the emerging Local Plan. This Trajectory continues to suggest that the Uttlesford element of the WoB GC will start delivering new homes by 2025/26, delivering a total of 970 new homes in the plan period. Given our comments above, this is a completely unreasonable and unevicenced position to adopt. As noted above, that part of the WoB GC within Uttlesford is wholly dependent upon key items of infrastructure coming forward within Braintree District first, attention, is drawn to the comments by Braintree District Council on the Regulation 18 draft of the emerging Uttlesford Local Plan, such that development and land uses should take place on the most suitable parts of the site for those uses and not because of their location on one side or other of a District boundary. (Countryside Properties LTD; PSLPA 164) • Constant reference to "the plan" and "sustainability" will not ensure that the Councils intentions now will be met in the future. Increased pollution affecting children on the way to school. Increased road deliveries (as above) this includes local chemists
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	<p>losing their NHS contacts (more deliveries) putting more pressure on GPs. (PSLPA203)</p> <ul style="list-style-type: none"> • 2a. Reserve sites to cater for the non <ul style="list-style-type: none"> 2b. delivery of the West of Braintree Garden Community GC Should be included for 2c. Not considered effectively as impact of non-delivery or lateness of Garden Communities not catered for 2d. No reference to NPPF July 2018. (Go Holdings; PSLPA165) • The proposed changes set out in Focused Changes 1 and 2 not address the concerns raised previously and given that Uttlesford District Council has acknowledged that there is an elevated risk around the delivery of the West of Braintree Garden Community (Pegasi Management LTD; PSPLA199) • Over Dependency on Garden Communities and over-ambitious expectations with regards to timing and delivery (Bloor Homes; PSLPA192) • Officers have obtained legal advice that says the updated SA should be published for representations but the Local Plan does not need to be published alongside it unless the updated SA points to conclusions which suggest that the Local Plan is not the most appropriate strategy to deliver its objectives, in the light of a comparative assessment with reasonable alternatives. Given the number of “significant concerns and potential areas of risk in terms of legal challenge” identified by AECOM we submit that the Council should go further than highlighting an “elevated risk” in respect of the delivery of WoBGC and instead remove the allocation from the emerging Plan. It should be replaced now by alternative sites. We submit that the latest work on the SA is the right time to reconsider the three new communities and whether reasonable alternatives including extensions to villages and market towns have a greater role to play. (Bloor Homes; PSLPA 192) • In order to ensure that this Policy meets the three tests of soundness, the Council should undertake additional evidence base work to demonstrate that their emerging Local Plan will deliver the housing need set out in their spatial strategy. 2.2. The current evidence base is not considered sufficiently robust to demonstrate the deliverability of the proposed garden communities within Focussed Change 1, SP3. To ensure that this Policy, and the emerging Plan as a whole, meets the three tests of soundness, the housing proposed to be delivered through the garden communities should be omitted from the proposed housing trajectory, not least until further evidence base work is undertaken. Doc No: IMS-F-15 Revision: 1 Date: 01.05.2018 Page: Page 2 of 10 2.3. This would result in a deficit of 4820 dwellings, including 970 dwellings proposed to be delivered within the West of Braintree Garden Community. Additional sites should be allocated in the short to medium term in order to meet the identified housing need. This would remove the uncertainty around the deliverability of their spatial strategy. The garden communities could come forward in future reviews of the Local Plan, once deliverability is confirmed with robust evidence. (Bovis
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	Homes; PSLPA 206)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Amend the stepped trajectory approach included in Policy SP3 so the housing requirement is evenly distributed throughout the Local Plan period, which will ensure objectively assessed needs in the District are met “ further sites will need to be identified as a result; • Apply the Sedgefield approach to address shortfalls in housing in the first five years of the plan as there is already an over-reliance on housing delivery in the later part of the plan period; • Reduce reliance on housing allocations during the Plan period coming from the proposed Garden Communities due to the intrinsic deliverability issues with garden community development associated with infrastructure requirements and lead-in times and allocate further sites to meet housing needs; • Update the assumptions relating to the delivery rates of the Garden Communities based on robust evidence and amend the housing trajectory accordingly; • Increase housing allocations from small to medium-sized sites in the emerging Local Plan to ensure delivery in the short-medium term is able to meet the Local Plan housing requirements, offset the reliance on the Garden Communities, as well as pick up any backlog which has been experienced in recent years. This is especially important give that a recent Appeal Decision in the District has identified that all parties agree that the Council cannot currently demonstrate an adequate five-year housing land supply; (Iceni Projects; PSLPA96) • Whilst Focussed Changes 1 and 3 are relatively minor, the only way they can properly be addressed is through the more significant changes to the Plan and its strategy as discussed in our response to Focussed Change 2. (Bloor Homes; PSLPA127) • The OAN should be increased to reflect an accurate assessment of UDC’s housing need; The Housing Trajectory is amended to reflect realistic delivery times; The Council should ensure a rolling five year supply of homes across the plan period and apply the Sedgefield methodology to meet backlog; and Additional sites in existing sustainable settlements should be allocated to provide required flexibility in the event West of Braintree or other sites in the Plan are delayed or do not come forward at all. (Countryside Properties; PSLPA164)

<u>Uttlesford District Council Regulation Regulation 19 Local Plan Summary of Representations for the Addendum of Focussed Changes of the Regulation 19 Local Plan</u>	
FOCUSSED CHANGE 2	Summary of Responses
SUPPORT	4
OBJECT	40
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • “Chelmsford City Councils response to Uttlesford District Council Focused Changes to Regulation 19 Local Plan Chelmsford City Council (CCC) welcomes the opportunity to comment on the focused changes to Uttlesford District Council (UDC) Regulation 19 Local Plan. CCC responded to the Regulation 19 Local Plan consultation and as such the comments to this focused review are based solely on the changes highlights in the consultation document and do not reiterate comments made to the Regulation 19 consultation. CCC notes the reasons for the focused changes and of interest to Chelmsford is the amendments regarding West of Braintree Garden Community and the timing for the delivery of the proposal following the Inspectors Report to the North Essex Authorities (NEA) Local Plans. The Local Plan stated that the West of Braintree Garden Community will deliver a minimum of 970 homes to the housing supply of Uttlesford District by 2033. CCC noted in its previous representation to the Regulation 19 Plan, the conclusion of the Inspector’s Report into the North Essex Authorities Strategic (Section 1) Plan, that further work is needed, and raised questions related to the deliverability of this specific allocation. Focused Changes 2 to 6 deal with the changes to the Plan to reflect the elevated risk around the delivery at West of Braintree GC. CCC supports these changes and notes the commitment to an early review should the delivery to the West of Braintree restrict the Councils ability to meet the housing requirement within Policy SP3 and Policy SP5. Focused change 6 to Policy SP8 “West of Braintree Community provides additional wording in relation to the land within Uttlesford for the Garden Community not being deliverable on its own without the land in Braintree District Council’s area. This is noted as the garden community straddles the District boundary with Braintree District Council and should come forward as a comprehensive package to ensure all supporting infrastructure is delivered. CCC has no further comments to make on the additional changes. CCC continues to be supportive of the approach taken in the Local Plan and do not raise any objections under soundness or legal compliance”. (Chelmsford City Council; PSLPA46) • Focused Change 2 in SP3 is strongly supported by Braintree District Council. The authority appreciates that there is an elevated risk level around the delivery of the Garden Community at West of Braintree and particularly around the timing of the decision making on the North Essex Authorities strategic section 1 Plan which also creates a level of uncertainty for the UDC examination. BDC can confirm that it has recently written to the Planning Inspector confirming that it wishes to proceed with the section 1 examination and is currently gathering further evidence base and

	<p>seeking comments on a method scoping statement for a revised Sustainability Appraisal. It is anticipated that this work will be completed early in 2019. Whilst the Council cannot prejudge the outcome of the further evidence base and Sustainability Appraisal, the evidence gathered so far continues to show a garden community at West of Braintree as a viable and deliverable option for long term growth. (Braintree District Council; PSLPA57)</p> <ul style="list-style-type: none"> • The NEAs section 1 Local Plans has requested further evidence base information relating to the West of Braintree Garden Community, the Colchester Braintree Borders Garden Community and the Colchester Tendring Borders Garden Community. The Inspector has not raised any heightened level of risk relating to delivery of the West of Braintree Garden Community above or beyond any risks associated with either the Colchester Braintree Borders, or the Colchester Tendring Borders Garden Communities. The NEAs remain firmly committed to the three North Essex Garden Communities, and have written to the Inspector to confirm that the requested additional evidence base will be provided and with a view to the examination continuing in early 2019. The further evidence base prepared to date by the NEAs continues to show the West of Braintree Garden Community being viable and deliverable. This is also demonstrated through the site specific evidence base prepared by GL Hearn on behalf of ANSC and submitted towards the UDC reg. 19 Local Plan. (GL Hearn PSLPA230) • We welcome the additional text which seeks to reflect the elevated risk around the delivery at West of Braintree. (Historic England; PSLPA329)
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • If, as noted, the examination into the North Essex Authorities Local Plans has identified an elevated level of risk around the delivery of the West of Braintree Garden Community then the council should plan positively as part of this Plan to address such a risk. The council should allocate additional sites, such as that off Beldams Lane, Bishop's Stortford, to ensure that the current proposed plan is sufficiently flexible to respond to the identified risk at West Braintree and effective in delivering the required housing without relying on an early review of the plan to address an already anticipated shortfall in supply. The reliance on an early review of the plan will take time and further frustrate delivery. If there is sufficient uncertainty to include Focussed Change 2 then there is sufficient justification now to allocate additional sites to address any potential shortfall and ensure the effectiveness of the Local Plan. (Planserv; PSLPA5) • The proposed change amends the wording of Policy SP3 to state that in the event that the West of Braintree garden community does not come forward as currently proposed the Council would undertake a Local Plan review. Anglian Water understands that the North Essex Authorities are intending to undertake further technical work relating to the garden communities in the North Essex Local Plan including West of Braintree (letter dated 19 th October 2018). With a further Local Plan consultation to be

	<p>undertaken in 2019 (to close March 2019). The examination is proposed to be suspended by the North Essex Authorities until February 2019 to allow for this which would delay the adoption of the North Essex Part 1 Local Plan. As drafted the wording of Policy is not explicit about the circumstances in which a Local Plan Review would be triggered and what criteria would be used. (Anglia Water; PSLPA2)</p> <ul style="list-style-type: none"> • As set out in our representations to the Regulation 19 consultation, more small-scale, deliverable sites should be allocated to account for the potential non-delivery / delay of this site (and other garden settlements) to enable sufficient flexibility in the development strategy and ensure that sufficient houses are delivered within the plan period. The NPPF has been amended to increase the importance of delivery and that should be reflected in this plan. The Uttlesford Local Plan, as drafted, will not deliver the number of homes needed and so the authority will continue to struggle to demonstrate a 5 year housing land supply for the duration of the plan. (Linden Homes; PSLPA10) • UDC state that WoB will only be included in its Local Plan if BDC adopt it in their Local Plan. However, the Government Planning Inspector who examined the BDC Local Plan and the Garden Communities proposals was very clear in his letter of 8th June that WoB is unviable, unjustifiable and unsustainable. The fact that BDC and the NEA are ignoring this advice from the Government Planning Inspector and pushing ahead with the less satisfactory Option 2, rather than Option 1 which the Inspector made clear was his favoured option, and spending even more public money on this vanity project, does not mean that UDC should do the same. We welcome the fact that UDC are taking note of the Government Inspector’s concerns and hope that, in fact, they give them more credence than BDC seem to be doing. (PLSPA28) • Currently, WoBGC is expected to contribute to housing supply in this period. This contribution should be moved later in the Plan period, no earlier than year 11, and additional sites should be allocated to make up the shortfall. Wider Implications of the NEA Inspector’s Findings As outlined in our original regulation 19 representations, the conclusions reached by the NEA Inspector have implications that stretch beyond WoBGC. I do not propose to repeat these concerns here, suffice to say they are not addressed by the focused changes. Review Policy Wording The review policy wording must satisfy paragraph 154 of the 2012 NPPF, namely it must provide a clear indication as to how to proceed. The proposed policy wording in SP3 sets the trigger for an early review as a restriction of the Council’s ability to meet the housing requirement. It is not at all clear what circumstances this would cover and, consequently, at what point the Council would consider that their ability to meet the housing requirement would be restricted. The policy should be drafted such that the trigger point for review is unambiguous and precise, potentially with reference to the need for any sites included within the 5 year housing land supply to meet the definition of deliverability set out in national
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	<p>policy. (Sworders; PSLPS26)</p> <ul style="list-style-type: none"> • We strongly object to the current wording of the Local Plan which seeks to resolve this issue by committing to a Local Plan Review. There is no detail in the policy as to how this Review would be triggered and no commitment as to timescales. The only reference to a trigger mechanism is in circumstances where risks associated with delivery of the West of Braintree site cannot be resolved and where the council cannot meet its housing requirement. Â This creates an uncertain and reactionary approach to planning future housing growth in the District. By the time the need for a Local Plan Review is identified, undertaken, and further sites allocated, the shortfall in housing delivery could have significantly worsened. The Local Plan at present therefore is not effective nor justified, as it not deliverable over the plan period and, due to this, it cannot be considered the most appropriate strategy for housing growth (paragraph 182 of the NPPF).(Iceni Projects; PLSPA33) • There is currently a significant degree of risk to the housing requirement being delivered and, therefore, a reasonable and more effective alternative would be to ensure that the housing requirement would be met with definitive allocations where there is very limited risk to delivery. By way of an example, an extension to the east of Newport, with approximately 150-200 units would be a reasonable alternative which is sustainable and deliverable. Â At the very least, UDC should seek to identify reserved sites which could be brought forward should the WBGC not be delivered or there is a significant delay with the delivery of the other garden communities. (Paragraph 14 of the NPPF states that Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change.) This should mean to have a deliverable set of sites now, rather than to await a review where there is a significant risk of a large site not coming forward within the Plan period (Taylor Wimpey; PSLPA75) • The reliance on the delivery of homes in the new Garden Communities represents an extremely high risk strategy (which is now acknowledged by the Council in relation to the delivery of the West Braintree Garden Village), given the higher infrastructure costs associated with new settlements. The dependence on new settlements poses a risk that these sites will not be deliverable or will not meet the timelines due to challenges of providing extensive infrastructure. The Draft Local Plan proposes to place significant reliance on the delivery of three new Garden Communities to meet housing needs for the district. (Pegasi Management; PSLPA201) • Notwithstanding the lack of evidence base, it is clear that there is a key emphasis from Uttlesford District on submitting the emerging Local Plan to the Secretary of State in advance of January 24th 2019, to ensure that the policies in the previous Framework will apply for the purpose of examining plans (NPPF para. 214). As a result, Uttlesford District would not be required to adopt the Government's Standardised OAN Methodology. 3.9. This focus on proceeding to submit the emerging Local Plan despite not having a
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	<p>robust evidence base to justify the deliverability of West of Braintree, is not an approach that is consistent with National Planning Policy. Paragraph 17 of the NPPF states that Local Authorities should ensure that their Local Plans should be proactively driven and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. 3.10. The inclusion of West of Braintree Garden Community within the Council’s emerging housing trajectory results in a risk that the District’s housing need might not be met in full during the emerging Local Plan period. As such, the emerging Local Plan cannot be considered as appropriately complying with National Planning Policy, which states that Local Plans should meet the full, objectively assessed needs for market and affordable housing in the housing market area. 3.11. Every effort should be made at this point to identify sufficient and deliverable sites to come forward. The Local Plan should therefore identify additional sites to come forward in the short term, and build in potential for reserve sites given that the OAHN is likely to increase in the next local plan and the uncertainty in respect of the deliverability of WoB GC. 3.12. These issues also reinforce our concerns with the proposed stepped trajectory, as we have raised in previous representations. Whilst it is appreciated that, in accordance with the Planning Practice Guidance, a stepped housing trajectory can be acceptable in certain cases, in respect of Uttlesford District, there is uncertainty that the strategic sites will come forward as anticipated, therefore rendering this stepped approach as unacceptable in this instance. (Boyer Planning / Bovis Homes; PSLPA207)</p> <ul style="list-style-type: none"> • As Easton Park GC relies on the rapid transit system, it is logical to conclude that delivery of this development would also be delayed for the same reasons as the Inspector has suspended the NEA’s examination. As a result, the Council will be unable to demonstrate a 5-year supply of housing land in the early years of the Plan and will need to allocate significant additional numbers of dwellings on sites that can be delivered quickly. This is exacerbated by the fact that the Council is already relying on a stepped trajectory. Given the scale and complexity of developing Garden Communities, 5 years is an extremely short time period to achieve occupation. Therefore a review of the LP would inevitably immediately follow adoption. (Pegasus Planning; PLSPA191) • North Essex Garden Communities Ltd (NEGC Ltd) was established to deliver the Garden Community proposals contained in the shared strategic Section 1 of the Braintree District Council, Colchester Borough Council, and Tendring District Council Local Plans which includes the proposal for the West of Braintree Garden Community. The company is wholly and equally owned by the aforementioned three district authorities as well as Essex County Council. In response to the consultation NEGC Ltd objects to Focussed Changes 1-6, and Focussed Change 9 of the Addendum of Focussed Changes to the Uttlesford District Council
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	<p>Local Plan (Reg 19) on the grounds that the changes are not necessary to make the plan effective and are therefore unjustified. Â NEGC Ltd considers the West of Braintree Garden Community as being fully achievable and presenting no elevated risks to delivery as is stated in the Focussed Changes. In order to elucidate these grounds for objection NEGC Ltd would like to be afforded the opportunity to submit evidence for consideration at the Examination, as well as provided with the opportunity to appear at the relevant Examination hearing sessions. (Colchester City Council; PSLPA174)</p> <ul style="list-style-type: none"> • Galliard does not believe there is an elevated level risk around the delivery of the West of Braintree Garden Community. A plan will be prepared to demonstrate how an initial stage of development can be delivered in the short term that is consistent with the ambitions of the Uttlesford Local Plan and addresses the issues raised by the Inspector after the Examination into the North Essex Strategic Plan. Both Uttlesford and Braintree Councils support the location of West of Braintree as strategic and sustainable. There is a danger that public sector resources are distracted in seeking to work up a complex Local Delivery Vehicle (LDV) which threatens to delay the bringing forward of early phases of the proposed settlement. Galliard is confident that it can work with local stakeholders to bring forward an early phase of development that need not prejudice a future LDV but demonstrates the ability to deliver quality homes consistent with garden community principles. The Plan will not be for an isolated development but for a first phase of the ultimate 10,000 home new community that will be developed on both sides of the Uttlesford/Braintree border. The Plan will demonstrate how the infrastructure to support the first phase will be delivered in advance or alongside the new homes. It will also explain how agreements can be put in place for infrastructure to serve the wider community as it evolves, and to secure the creation of a new place of the highest quality that will reflect garden community principles (TCPA).(WYG Galliard Homes; PSLP174)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Policy SP 3 should be amended by the deletion of any reference to West of Braintree from the policy, and replacement housing provision identified for the 970 dwellings previously proposed for delivery within the Plan period (Stebbing Parish Council; PSLPA79) • It is considered that there is a need to clarify the circumstances in which a Local Plan Review would be undertaken and the focus of any review. Local Plans in the region are used to inform infrastructure investment decisions made by Anglian Water therefore it would be helpful if the proposed wording relating to the Local Plan Review is clarified. For example it is assumed that this would include the identification of additional housing allocation sites if required. (Anglian Water; PSLPA2)

<u>Uttlesford District Council Regulation Regulation 19 Local Plan Summary of Representations for the Addendum of Focussed Changes of the Regulation 19 Local Plan</u>	
FOCUSSED CHANGE 3	Summary of Responses
SUPPORT	1
OBJECT	24
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • Chelmsford City Council’s response to Uttlesford District Council Focused Changes to Regulation 19 Local Plan Chelmsford City Council (CCC) welcomes the opportunity to comment on the focused changes to Uttlesford District Council (UDC) Regulation 19 Local Plan. CCC responded to the Regulation 19 Local Plan consultation and as such the comments to this focused review are based solely on the changes highlights in the consultation document and do not reiterate comments made to the Regulation 19 consultation. CCC notes the reasons for the focused changes and of interest to Chelmsford is the amendments regarding West of Braintree Garden Community and the timing for the delivery of the proposal following the Inspectors Report to the North Essex Authorities (NEA) Local Plans. The Local Plan stated that the West of Braintree Garden Community will deliver a minimum of 970 homes to the housing supply of Uttlesford District by 2033. CCC noted in its previous representation to the Regulation 19 Plan, the conclusion of the Inspector’s Report into the North Essex Authorities Strategic (Section 1) Plan, that further work is needed, and raised questions related to the deliverability of this specific allocation. Focused Changes 2 to 6 deal with the changes to the Plan to reflect the elevated risk around the delivery at West of Braintree GC. CCC supports these changes and notes the commitment to an early review should the delivery to the West of Braintree restrict the Council’s ability to meet the housing requirement within Policy SP3 and Policy SP5. Focused change 6 to Policy SP8 “West of Braintree Community provides additional wording in relation to the land within Uttlesford for the Garden Community not being deliverable on its own without the land in Braintree District Council’s area. This is noted as the garden community straddles the District boundary with Braintree District Council and should come forward as a comprehensive package to ensure all supporting infrastructure is delivered. CCC has no further comments to make on the additional changes. CCC continues to be supportive of the approach taken in the Local Plan and do not raise any objections under soundness or legal compliance. (Chelmsford City Council; PSLPA37) • North Essex Garden Communities Ltd (NEGC Ltd) was established to deliver the Garden Community proposals contained in the shared strategic Section 1 of the Braintree District Council, Colchester Borough Council, and Tendring District Council Local Plans which includes the proposal for the West of Braintree Garden Community. The company is wholly and equally owned by the aforementioned three district authorities as well as Essex County Council. In response to the consultation NEGC Ltd objects to Focussed Changes 1-6, and Focussed Change 9 of the

	<p>Addendum of Focussed Changes to the Uttlesford District Council Local Plan (Reg 19) on the grounds that the changes are not necessary to make the plan effective and are therefore unjustified. NEGC Ltd considers the West of Braintree Garden Community as being fully achievable and presenting no elevated risks to delivery as is stated in the Focussed Changes. In order to elucidate these grounds for objection NEGC Ltd would like to be afforded the opportunity to submit evidence for consideration at the Examination, as well as provided with the opportunity to appear at the relevant Examination hearing sessions. (Colchester City Council; PSLPA159)</p>
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • Alongside Focused Change 4, this change seeks to amend the wording of a key policy relating to delivery of the Garden Communities (Policy SP5). The recognition around the elevated risks to delivery of the West of Braintree Garden Community is supported. These elevated risks however fundamentally undermine the purpose of the strategic policy and the proposed wording highlights concerns we raised in the Regulation 19 Representations on the timescales for delivering the Garden Communities. Please read our response to Focussed Change 4 for further detail. (Iceni Projects; PSLPA34) • These amendments are considered not positively prepared. Ostensibly, the text amendments within these Focussed Changes is limited in scope however these reflect the fact that the more substantive changes within Focussed Change 2 weakens the policy provision somewhat. The original policy wording can be considered definitive, (i.e. Provision will be made and garden communities will be delivered) [our emphasis added]. The wording implies that development will come forward with a degree of certainty. That is what a sound Local Plan should achieve, if it is to be positively prepared. The amended wording i.e. “The plan is to delivered” is markedly weaker in this respect. It is fair to plan for growth but it is essential to achieve that growth. This is particularly the case in the context of the new Framework; provisions such as the Housing Delivery Test (which take effect irrespective of whether the Local Plan has been submitted under transitional arrangements) place a great deal of emphasis on the delivery of new homes, infrastructure and development. (Pegasus Planning; PSLPA118) • Without a good public transport link to enable West of Braintree residents to travel to employment in Saffron Walden or Stansted Airport and no local station for rail commuters to London, Cambridge, Colchester, Harlow or Chelmsford, almost all journeys would need to be made by car. This conflicts with national planning policy and will bring significant congestion to the A120 junction, M11 junction and the local road network. However, the Inspector has stated that the Garden Communities could not be developed in full without additional strategic road capacity and the timing for delivery of such strategic infrastructure improvements is unknown. Because of the high level of uncertainty over the future of West of Braintree GC, CPRE welcomes the cautious nature of

	<p>the proposed changes to the wording of the policies relating to the GC. However, since the Braintree element fails on Viability, Deliverability, Sustainability and Transport all the same reasons apply for the UDC element and CPRE has to ask the question: in such circumstances, can UDC actually proceed with the proposed West of Braintree Garden Community? (CPREssex; PSLPA103)</p> <ul style="list-style-type: none"> • In light of the “elevated risk” that the West of Braintree Garden Community will either not prove deliverable or otherwise not prove deliverable within the Plan period, we do not consider the reference to this Garden Community to be justified and should be deleted from the Local Plan. (Edward Gittins & Associates; PSLPA132)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Whilst Focussed Changes 1 and 3 are relatively minor, the only way they can properly be addressed is through the more significant changes to the Plan and its strategy as discussed in our response to Focussed Change 2. It is recognised by the Council that there are significant risks associated with the Garden Communities strategy. Endurance Estates considers that additional allocations are made in sustainable settlements (such as Takeley, with good access to employment, services and transport) including sites which are readily deliverable such as land at Parsonage Road. Such sites can come forward promptly and reliably, meaning the Plan will be less dependent upon the delivery of the Garden Communities at an early stage of the Plan period. The Housing Trajectory will therefore be better placed to demonstrate a rolling five year supply of housing, and to respond to any delays to the delivery of the Garden Communities. (PSLPA256; Endurance Estates Takeley) • As regards to the west of Braintree garden village the Local Plan should positively plan for growth. Would it not be more logical to plan reserve sites during the current Local Plan process. This would ensure no further delays which otherwise result from the review process suggested. (PSLPA147; Go Holdings)

<u>Uttlesford District Council Regulation Regulation 19 Local Plan Summary of Representations for the Addendum of Focussed Changes of the Regulation 19 Local Plan</u>	
FOCUSSED CHANGE 4	Summary of Responses
SUPPORT	4
OBJECT	26
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • ECC supports reference to a “Quality and Collaboration Partnership” but suggest the term is explained in the Local Plan so it is clear to all what this means and how this will positively influence delivery. (Essex County Council; PSLPA39) • Chelmsford City Council’s response to Uttlesford District Council Focused Changes to Regulation 19 Local Plan Chelmsford City Council (CCC) welcomes the opportunity to comment on the focused changes to Uttlesford District Council (UDC) Regulation 19 Local Plan. CCC responded to the Regulation 19 Local Plan consultation and as such the comments to this focused review are based solely on the changes highlights in the consultation document and do not reiterate comments made to the Regulation 19 consultation. CCC notes the reasons for the focused changes and of interest to Chelmsford is the amendments regarding West of Braintree Garden Community and the timing for the delivery of the proposal following the Inspectors Report to the North Essex Authorities (NEA) Local Plans. The Local Plan stated that the West of Braintree Garden Community will deliver a minimum of 970 homes to the housing supply of Uttlesford District by 2033. CCC noted in its previous representation to the Regulation 19 Plan, the conclusion of the Inspector’s Report into the North Essex Authorities Strategic (Section 1) Plan, that further work is needed, and raised questions related to the deliverability of this specific allocation. Focused Changes 2 to 6 deal with the changes to the Plan to reflect the elevated risk around the delivery at West of Braintree GC. CCC supports these changes and notes the commitment to an early review should the delivery to the West of Braintree restrict the Council’s ability to meet the housing requirement within Policy SP3 and Policy SP5. Focused change 6 to Policy SP8 “West of Braintree Community provides additional wording in relation to the land within Uttlesford for the Garden Community not being deliverable on its own without the land in Braintree District Council’s area. This is noted as the garden community straddles the District boundary with Braintree District Council and should come forward as a comprehensive package to ensure all supporting infrastructure is delivered. CCC has no further comments to make on the additional changes. CCC continues to be supportive of the approach taken in the Local Plan and do not raise any objections under soundness or legal compliance. (Chelmsford City Council; PSLPA28) • There are three changes to this final paragraph within the policy on Garden Community principles. All three changes are noted and supported by Braintree District Council. There are no further comments in relation to the first change. We note the purpose of the second change in recognition of the elevated risks with the

	<p>West of Braintree Garden Community and particularly support the recognition within that change that the development here will be part of a wider garden community. We also strongly support the third change which will help to ensure that garden community principles are delivered on any site which is privately developed as well as those which may be developed through a locally led development corporation model any site which is privately developed as well as those which may be developed through a locally led development corporation model. (Braintree District Council; PSLPA58)</p> <ul style="list-style-type: none"> • ANSC supports the focussed change: Nevertheless, it is understood that Uttlesford District Council is confident that the proposed new West of Braintree Garden Community can be delivered (GL Hearn; PSLPA231) • These representations have been prepared by Bidwells on behalf of Grosvenor Britain & Ireland (Grosvenor) to the Addendum of Focussed Changes to Uttlesford District Council’s (UDC) Regulation 19 Pre-Submission Local Plan (hereby referred to as the “Local Plan”). Grosvenor has been appointed by a consortium of landowners who control the vast majority of the land which is proposed to be allocated in the Local Plan as North Uttlesford Garden Community (NUGC). NUGC is to be allocated as one of three new garden communities in the Local Plan through draft Policy SP7. <p style="text-align: center;">These representations should be read alongside those submitted by Bidwells on behalf of Grosvenor to the Regulation 19 Pre-Submission Local Plan consultation which closed on 13 August 2018. We acknowledge that representations to this consultation must solely relate to new information contained in the addendum or newly published evidence base. As such, these representations are made in relation to Box FC 4 Focussed Change 4, which introduces additional wording to the final paragraph of Policy SP5 Garden Community Principles. The proposed change is set out below:</p> <p style="text-align: center;">The Council is confident that the new garden communities at Easton Park and North Uttlesford can be delivered. Notwithstanding the possible risks to delivery of West of Braintree Garden Community the Council is continuing to plan for development here as part of a larger garden community extending into Braintree. The exact delivery model for each garden community will be determined separately from the land-use planning process, however the Council will need to be satisfied that any proposed delivery model will realise all the garden city principles and a test will be established in the Development Plan Document to enable this to be determined. Delivery models could range from privately led arrangements to locally-led development corporations with compulsory purchase powers. In the case of a privately led arrangement there will be a requirement for a master</p>
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	<p>developer to enter into a 'Quality and Collaboration Partnership' with the Council. If necessary, the Council will consider intervening directly to ensure the garden city principles are met within the proposed timetable set out within the Local Plan. Box FC 4 "Focussed Change 4 We object to Box FC 4 "Focussed Change 4 which proposes a change to require a master developer of a garden community in a privately led arrangement to enter into a "Quality and Collaboration Partnership" with UDC. This would be unnecessary in planning terms because the Regulation 19 Local Plan policies, which include for the preparation of a site-specific Development Plan Document (DPD), will be adequate, to empower the Local Planning Authority to secure a high-quality development. At this time, there is no detail provided in the Policy as to what form the Quality and Collaboration Agreement will take or what it may seek to include, which creates uncertainty. On the information available, these matters may hinder the effectiveness of the plan to deliver homes and jobs to the intended trajectory. Notwithstanding these points, we support the principle of partnership and working to achieve Quality and Collaboration; this will help to ensure that NUGC will be a high-quality new garden community delivered in accordance with the Town and Country Planning Association's (TCPA) Garden City Principles and to secure the objectives of draft Policy SP7 of the Local Plan. We look forward to working with UDC and the community to achieve this. Conclusion In summary, we object to Box FC 4 and to make the Plan sound, the following proposed Focussed Change should be deleted: In the case of a privately led arrangement there will be a requirement for a master developer to enter into a 'Quality and Collaboration Partnership' with the Council. Grosvenor is committed to continue working with UDC and other stakeholders to deliver a high-quality new garden community at NUGC, but the imposition of a Quality and Collaboration Agreement is not a necessary element of the policy and could impact upon the effectiveness of the Local Plan. As set out in our previous representations, we formally request that Grosvenor is invited to participate in all examination hearing sessions relevant to NUGC in accordance with section 20(6) of the Planning and Compulsory Purchase Act 2004. (Bidwells for Grosvenor; PSLPA45)</p>
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • The examination into the North Essex Authorities Local Plans has identified an elevated level of risk around the delivery of the West of Braintree Garden Community; however, the council has not provided any evidence to justified its continued confidence in the delivery of this site. The council should plan positively as part of this Plan to address such a risk by allocating additional sites, such as that off Beldams Lane, Bishop's Stortford, to ensure that the

	<p>current proposed plan is sufficiently flexible to respond to the identified risk at West Braintree and effective in delivering the required housing without relying on an early review of the plan to address an already anticipated shortfall in supply (Plansurv; PSLPA6)</p> <ul style="list-style-type: none"> • Alongside Focused Change 3, this change seeks to amend the wording of a key policy relating to delivery of the Garden Communities (Policy SP5). The changes states that regardless of the uncertainties raised with the delivery of the West of Braintree Garden Community that the Council remain confident that the other two Garden Communities in the Local Plan; Easton Park and North Uttlesford can be delivered. However, as identified in our Regulation 19 Representations, we consider that the issues with the West of Braintree Garden Community highlight the complexities of delivering these sites and further go to prove the concerns we raised previously about timescales for Easton Park and North Uttlesford. The optimistic housing trajectory for Easton Park and North Uttlesford presents a risk to delivery of the Local Plan which is further compounded by the uncertainties of delivering such sites, as highlighted by the Council in relation to West of Braintree. In order to be sound a Local Plan must be effective (i.e. deliverable over its period) (NPPF paragraph 182). However, again, the significant and justified concerns raised here regarding the deliverability of the Garden Communities go to the heart of the soundness of the Local Plan. To rectify these soundness issues, as set out in our previous representations, further sites should be identified and allocated to ensure housing delivery in the early part of the plan period. Our representations highlighted the sustainability of land south of Stansted Mountfitchet and identified the exceptional circumstances which exist to justify its release from the Green Belt. These overriding economic and social benefits will assist in creating an important growth hub around Stansted Airport as part of the London Stansted Cambridge Corridor (LSCC) economic growth area. In short, it will contribute to the provision of sustainable development within the District. (Iceni Projects; PSLPA 35) • The proposed policy wording appears to acknowledge the possibility of the site being brought forward through other means, regardless of allocation within the Local Plan. Whilst Natural England does not raise concern with this in itself we would highlight to you the implications of this in the context of the emerging strategic solution, the Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS). Within the Regulation 19 draft plan, policy SP8 in relation to the West of Braintree Garden community includes wording that requires contributions to be collected towards this strategic solution (see point 9 of this policy). At present this is the only policy trigger for this strategic solution in the Uttlesford Local Plan. As per our advice letter dated 13th August 2018 and the subsequent interim advice sent in relation to the Essex RAMS (dated 16th August 2018 reference 244199) the Uttlesford Local Plan area falls within the Zone of
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	<p>Influence (Zol) for the identified recreational impacts on the Essex coast designated sites. To ensure compliance the Habitats Regulations, mitigation is therefore required for all new residential housing that falls within this area. Should the West of Braintree development no longer proceed, there would consequently be no other reference to this requirement for contributions. Natural England therefore would reiterate the importance of including an overarching Essex RAMS policy which would be valid in the context of the West of Braintree site coming forward outside of the allocation, or any other development such as potential windfall that may be within this Zol. Should such wording not be included the plan would be considered unsound and not compliant with the Habitats Regulations (further assessment in the context of the Habitats Regulations is outlined as below). Regardless of participation in the strategic solution, compliance to the Habitats Regulations is required and therefore should this wording not be appropriate, we would advise that a similarly worded policy is included, with reference to the requirement for project level HRAs (Natural England; PSLPA97)</p> <ul style="list-style-type: none"> • 2.2. Focussed Change 4 2.2.1. The Council states within Focussed Change 4 that it is confident that the new Garden Communities at Easton Park and North Uttlesford can be delivered notwithstanding the possible risks associated with West of Braintree. 2.2.2. Whilst some of the concerns raised by the Inspector for the North Essex Examination related to specific issues, the Inspector had fundamental concerns with the ability of North Essex to deliver three new Garden Communities on such a scale in a relatively small geographic area. 2.2.3. This is very similar to the issues faced by Uttlesford where the three new Garden Communities include Easton Park for a potential 10,000 units, North Uttlesford for 5,000 units and West of Braintree Garden Community for 10,500-13,500 units with up to 3,500 to be located within Uttlesford itself. 2.2.4. This scale of development in one location is likely to encounter very similar issues to those raised by the North Essex Inspector, especially as it is across a relatively small geographic area and in close proximity to the North Essex large scale strategic proposals. 2.2.5. The uncertainty and concern that all of the above raises, further enhances our belief that the Plan should be paused to undertake a fundamental review of its strategy given the findings of the North Essex Inspector. (Gladman; PSLPA126) • For a small Authority like UDC to be attempting to plan for three new communities of the scale proposed would appear to be an even more ambitious and spurious undertaking. It is, therefore, considered neither realistic nor feasible for the District Council to seek to deliver three new Garden Communities. <p style="text-align: right;">The proposed Garden Community allocations, without further supporting evidence, continue to appear to be an attempt to allocate sites based on availability rather than considering sustainable, deliverable development according to the</p>
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	<p>requirements of the NPPF. Without a good public transport link to enable West of Braintree residents to travel to employment in Saffron Walden or Stansted Airport and no local station for rail commuters to London, Cambridge, Colchester, Harlow or Chelmsford, almost all journeys would need to be made by car. This conflicts with national planning policy and will bring significant congestion to the A120 junction, M11 junction and the local road network.</p> <p>However, the Inspector has stated that the Garden Communities could not be developed in full without additional strategic road capacity and the timing for delivery of such strategic infrastructure improvements is unknown. Because of the high level of uncertainty over the future of West of Braintree GC, CPRE welcomes the cautious nature of the proposed changes to the wording of the policies relating to the GC. However, since the Braintree element fails on Viability, Deliverability, Sustainability and Transport all the same reasons apply for the UDC element and CPRE has to ask the question: in such circumstances, can UDC actually proceed with the proposed West of Braintree Garden Community? (CPREssex; PSLPA104)</p> <ul style="list-style-type: none"> • North Essex Garden Communities Ltd (NEGC Ltd) was established to deliver the Garden Community proposals contained in the shared strategic Section 1 of the Braintree District Council, Colchester Borough Council, and Tendring District Council Local Plans which includes the proposal for the West of Braintree Garden Community. The company is wholly and equally owned by the aforementioned three district authorities as well as Essex County Council. In response to the consultation NEGC Ltd objects to Focussed Changes 1-6, and Focussed Change 9 of the Addendum of Focussed Changes to the Uttlesford District Council Local Plan (Reg 19) on the grounds that the changes are not necessary to make the plan effective and are therefore unjustified. NEGC Ltd considers the West of Braintree Garden Community as being fully achievable and presenting no elevated risks to delivery as is stated in the Focussed Changes. In order to elucidate these grounds for objection NEGC Ltd would like to be afforded the opportunity to submit evidence for consideration at the Examination, as well as provided with the opportunity to appear at the relevant Examination hearing sessions. (Colchester City Council; PSLPA160) • Galliard does not agree with the implication in FC 4 that a private sector-led arrangement will somehow require further controls to ensure quality. It is after all the private sector developer that has the experience of undertaking development, not the public sector organisation that has only been in existence for a short time and has no experience of carrying out development at all. Furthermore, there should not be a reference to a Quality and Collaboration Partnership in the proposed policy when no indication is given of what that would consist of. We proposed that
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	<p>change is deleted and the previous reference to “quality” in local plan policy SP5 is retained. (WYG Grosvenor for Gallidard; PSLP176)</p>
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • C 4 should be reworded to read: <p style="margin-left: 40px;">The Council is confident hopeful that the new garden communities at Easton Park and North Uttlesford can be delivered. Notwithstanding Given the possible risks to delivery of West of Braintree Garden Community the Council is continuing to plan for development here as part of a larger garden community extending into Braintree but also proposes additional allocations across the district to ensure delivery is maintained in the event the West of Braintree Garden Community is delayed. The exact delivery model for each garden community will be determined separately from the land-use planning process, however the Council will need to be satisfied that any proposed delivery model will realise all the garden city principles and a test will be established in the Development Plan Document to enable this to be determined. Delivery models could range from privately led arrangements to locally-led development corporations with compulsory purchase powers. In the case of a privately led arrangement there will be a requirement for a master developer to enter into a 'Quality and Collaboration Partnership' with the Council. If necessary, the Council will consider intervening directly to ensure the garden city principles are met within the proposed timetable set out within the Local Plan. (Plansurv; PSLPA6)</p> • If your authority decides to participate in the Essex RAMS strategic solution we would recommend the inclusion of wording along the following lines: Where appropriate, contributions from developments will be secured towards mitigation measures identified in the Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS) which will be completed by the time the Local Plan is adopted. Prior to RAMS completion, the authority will seek contributions, where appropriate, from proposed residential development to deliver all measures identified (including strategic measures) through project level HRAs, or otherwise, to mitigate any recreational disturbance impacts in compliance with the Habitat Regulations and Habitats Directive. Regardless of participation in the strategic solution, compliance to the Habitats Regulations is required and therefore should this wording not be appropriate, we would advise that a similarly worded policy is included, with reference to the requirement for project level HRAs. (Natural England; PSLPA97) • An alternative approach is required; one that increases the number of new dwellings to be provided and accommodates the increase by promoting greater flexibility of location and consequent improved reliance on delivery across a wider range of locations. (Wellsbridge; PSLPA67)

<u>Uttlesford District Council Regulation Regulation 19 Local Plan Summary of Representations for the Addendum of Focussed Changes of the Regulation 19 Local Plan</u>	
FOCUSSED CHANGE 5	Summary of Responses
SUPPORT	4
OBJECT	27
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> North Essex Garden Communities Ltd (NEGC Ltd) was established to deliver the Garden Community proposals contained in the shared strategic Section 1 of the Braintree District Council, Colchester Borough Council, and Tendring District Council Local Plans which includes the proposal for the West of Braintree Garden Community. The company is wholly and equally owned by the aforementioned three district authorities as well as Essex County Council. In response to the consultation NEGC Ltd objects to Focussed Changes 1-6, and Focussed Change 9 of the Addendum of Focussed Changes to the Uttlesford District Council Local Plan (Reg 19) on the grounds that the changes are not necessary to make the plan effective and are therefore unjustified. NEGC Ltd considers the West of Braintree Garden Community as being fully achievable and presenting no elevated risks to delivery as is stated in the Focussed Changes. In order to elucidate these grounds for objection NEGC Ltd would like to be afforded the opportunity to submit evidence for consideration at the Examination, as well as provided with the opportunity to appear at the relevant Examination hearing sessions. (Colchester Borough Council; PSLPA161)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Anglian Water is the sewerage undertaker for the West of Braintree Garden community. The proposed change amends the wording of Policy SP5 to state that in the event that the West of Braintree garden community does not come forward as currently proposed the Council would undertake a Local Plan review. Anglian Water understands that the North Essex Authorities are intending to undertake further technical work relating to the garden communities in the North Essex Local Plan including West of Braintree (letter dated 19 th October 2018). With a further Local Plan consultation to be undertaken in 2019 (to close March 2019). The examination is proposed to be suspended by the North Essex Authorities until February 2019 to allow for this which would delay the adoption of the North Essex Part 1 Local Plan. As drafted the wording of Policy is not explicit about the circumstances in which a Local Plan Review would be triggered and what criteria would be used. (Anglian Water; PSLPA3) The examination into the North Essex Authorities Local Plans has identified an elevated level of risk around the delivery of the West of Braintree Garden Community; however, the council has not provided any evidence to justified its continued confidence in the delivery of this site. The council should plan positively as part of this Plan to address such a risk by allocating additional sites, such as that off Beldams Lane, Bishop's Stortford, to ensure that the current proposed plan is sufficiently flexible to respond to the identified risk at West Braintree and effective in delivering the

	<p>required housing without relying on an early review of the plan to address an already anticipated shortfall in supply. (Plansurv; PSLPA7)</p> <ul style="list-style-type: none"> • We support the changes in the policy wording to identify the issues with delivery of the West Braintree Garden Community however, we object to the policy wording in relation to the Local Plan Review. Our comments to Focused Change 2 set out our concerns in relation to West of Braintree in detail. (Iceni Projects; PSLPA36) • These changes are similar to that set out in Focussed Change 2 although also refers to the risk of significant delays, undeliverability, or inability to meet housing or jobs targets, as potential triggers for the early review of the Local Plan. Our same concerns and proposed remedy for Focussed Change 2 are equally applicable here. (Pegasus Group; PSLPA259) • Natural England does not raise concern with this in itself we would highlight to you the implications of this in the context of the emerging strategic solution, the Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS). Within the Regulation 19 draft plan, policy SP8 in relation to the West of Braintree Garden community includes wording that requires contributions to be collected towards this strategic solution (see point 9 of this policy). At present this is the only policy trigger for this strategic solution in the Uttlesford Local Plan. As per our advice letter dated 13th August 2018 and the subsequent interim advice sent in relation to the Essex RAMS (dated 16th August 2018 reference 244199) the Uttlesford Local Plan area falls within the Zone of Influence (Zol) for the identified recreational impacts on the Essex Coast designated Sites. To ensure compliance with the Habitats Regulations, mitigation is therefore required for all new residential housing that falls within this area, Should the West of Braintree development no longer proceed, there would consequently be no other reference to this requirement for contributions. Natural England therefore would reiterate the importance of including an overarching Essex RAMS policy which would be valid in the context of the West of Braintree site coming forward outside of the allocation, or any other development such as potential windfall that may be within this Zol. Should such wording not be included the plan would be considered unsound and not compliant with the Habitats Regulations (further assessment in the context of the Habitats Regulations is outlined as below). (Natural England; PSLPA254) • Focussed Change 5 As set out in our August representations, we consider there may be a requirement for UDC to consider alternative options to ensure early delivery of housing. We consider that further explanation should be provided regarding the proposed approach should the West of Braintree allocation prove undeliverable. For example, the Local Plan could include alternatives options, such as increasing the delivery rates for sites allocated in the Local Plan, or the addition of new allocation(s). We consider it would be helpful for the Local Plan to set these out as
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	<p>alternative options alongside a potential early review, should this prove necessary to provide reassurance of available options to maintain soundness. (PSLPA124)</p> <ul style="list-style-type: none"> • The Council’s reliance on the WoB GC site to meet its housing and jobs requirements either within the Plan period or beyond can no longer be substantiated having regard to the uncertainties surrounding this and other GCs in North Essex following the Section 1 Examination of that Plan. The fallback position of an early review if it transpires that the WoB GC is not deliverable or delayed introduces yet further uncertainty and hence associated planning blight into the Plan-making process and is unacceptable on that score alone. The proposed wording of this Focussed Change is not justified and should be rejected.(Edward Gittins & Associates; PSLPA139) • The LP as amended still makes erroneous assumptions and the desirability / dependence on Garden Communities and the timing of their delivery. Delivery of 970 dwellings in Essex in the plan period at WoBGC is unsound as outlined by Inspector Clews in June 2018 (re North Essex Authorities) Examination. In view of uncertainty over WoBGC, the reference to Garden Communities there should be deleted. Alternative sites should be allocated to meet housing in the UDC Area. The LP remains unsound so these comments relate to Changes 2-6 inclusive and 9 (Stebbing Parish Council; PSLPA137) • There is a lack of clarification and detail as to how and when exactly this issue will be dealt with. UDC have not made it explicit what the threshold for “significant delays” to the delivery of WoBGC will be or at what stage the council will consider the site to be “undeliverable”. The expected timetable of the NEAs indicates that the NEA expected hearings to recommence in June 2019. this would be six months after UDC intends to submit their LP for examination. The approach taken by UDC to mitigate the risk of non-delivery or under-delivery of the WoBGC by setting a contingency for an early Local Plan Review is considered unsound. Basing the spatial strategy on the outcome of an examination which is not expecting 1.22 to recommence until June 2019 when the examination hearings for UDC's Local Plan are anticipated to commence is not a sound or positive plan-making strategy. it will not be possible for just a single policy to be reviewed. The housing requirement will need to be in line with the requirements of the Revised NPPF (2018) and the standard method calculation of housing need. The Review would therefore need to set out not only how the housing from the WoB GC would be provided for but also the additional housing set out in the standard method calculation. This would require a whole new spatial strategy which would not be sufficiently covered by a Local Plan Review. In addition, it is unclear as to how a Local Plan assessed against the 2012 NPPF and a Local Plan Review assessed against the Revised NPPF (2018) would work in practice or if it is a sound approach. This is a unique scenario in that there has never been a transition
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	<p>period between two national policy frameworks, and the NPPG is not explicit in how reviews should be carried out of a Local Plan which has been assessed under the 2012 NPPF. UDC anticipates they will submit their Local Plan for examination in January 2019. Given a large number of LPAs are intending to submit their Local Plans at this time, hearings for UDC's Local Plan are unlikely to start until June 2019. Assuming the examination runs smoothly, adoption of the Local Plan is expected to be the end of 2019 or the beginning of 2020. As set out in the representations submitted previously, the housing trajectory for the period between 2022/23 and 2027/28 -and thus will be unable to demonstrate a five year housing land supply for a number of years during the middle of the plan period. This points towards a lack of early delivery sites which are an important aspect of the Local Plan for an LPA which has a track record of underdelivery. This will be further exacerbated in the event that WoB GC does not come forward in a timely manner, or at all. It is clear that UDC are failing to comply with paragraph 47 of the 2012 NPPF in this regard and that the current strategy will not maintain a five-year supply of housing land. The Local Plan therefore cannot be found sound on this basis. If UDC called for an early review of the Local Plan in order to address this undersupply of homes in early 2023, it would need to issue a Call for Sites and go out to public consultation before submitting to the Secretary of State for examination. Such a significant change in spatial strategy would be best addressed through a new Local Plan. If a Local Plan Review were to be adopted in late 2025 then delivery of dwellings to replace those units allocated to WoB GC, would most likely not occur until 2028. This represents a significant delay in the delivery of a large number of homes within the district. (Village Developments Takeley; PSLPA189)</p> <ul style="list-style-type: none"> • Focussed Change 5 We believe this change should apply to all three proposed garden communities.(WYG Group; PSLPA177) • The purpose of a Local Plan is to set out policies about housing and employment growth and appropriate locations for that growth over the period of that plan. The Uttlesford Addendum of Focussed Changes accepts that the Examination of the North Essex Authorities Local Plans has caused an elevated level of risk about the delivery of one of the sites that is integral to meeting the housing numbers set out in Uttlesford's Regulation 19 document. The text of Focussed Change 2 includes the following new wording: "If these risk issues are not capable of being resolved, and should that restrict the Council's ability to meet the housing requirement, then the Council will undertake an early review of the Local Plan to consider how the requirements can be met." Wording to the same effect is also to be found in Focussed Change 5 and Focussed Change 9. Given that this Local Plan is intended to cover a period up to and slightly beyond 2030 and noting how long it has taken to even get to this stage of the plan process, in my view the Plan should directly address the housing requirements set out within it. The Plan that is eventually submitted to national government should set out how the housing
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	<p>requirements are to be met. If that requires further consultation, including setting out a range of possible strategies to meet the overall housing requirement, then so be it. In conclusion, I object to the wording in Focussed Changes 2, 5 and 9 that proposes, in the event of the West of Braintree Garden Community issues not being capable of being resolved, that there should be an early revision to this Local Plan. In my view, this Local Plan should address the issue fully, the matter should not be passed into some indefinite future. (PSLPA182)</p>
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • FC 5 should be reworded to read as follows: If it becomes apparent that Additional allocation have been made to mitigate the risk that the West of Braintree Garden Community will be significantly delayed, or is not deliverable, and should that restricts to ensure the Council’s ability to meet the homes and jobs requirements , then the Council will undertake an early review of the Local Plan to consider how these requirements can be met . (Plansurv; PSLPA7) • Policy SP 5 should be amended by the deletion of any reference to West of Braintree from the Garden Community Principles policy (Stebbing Parish Council; PSLPA81) • If your authority decides to participate in the Essex RAMS strategic solution we would recommend the inclusion of wording along the following lines: Where appropriate, contributions from developments will be secured towards mitigation measures identified in the Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS) which will be completed by the time the Local Plan is adopted. Prior to RAMS completion, the authority will seek contributions, where appropriate, from proposed residential development to deliver all measures identified (including strategic measures) through project level HRAs, or otherwise, to mitigate any recreational disturbance impacts in compliance with the Habitat Regulations and Habitats Directive. Regardless of participation in the strategic solution, compliance to the Habitats Regulations is required and therefore should this wording not be appropriate, we would advise that a similarly worded policy is included, with reference to the requirement for project level HRAs.(Natural England; PSLPA254) • Paragraph 61-046-20180913 of the NPPG sets out what LPAs can consider when determining whether policies should be updated as part of a Local Plan Review. It is our suggestion that any Local Plan Review should look at the following: <ul style="list-style-type: none"> The conformity with national planning policy. Changes to local circumstances; such as a change in Local Housing Need. Housing Delivery Test performance. Whether UDC can demonstrate a five year supply of deliverable sites for housing. Plan-making activity by other authorities, such as whether they have identified that they are unable to meet their housing need. The amount of considerations which would need to be looked at means that a review would not be sufficient and a

Statement of Consultation
Summary of Representations Focussed Change 5

	brand new Local Plan would need to be progressed. (Village Developments, Takeley; PSLPA189)
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<u>Uttlesford District Council Regulation Regulation 19 Local Plan Summary of Representations for the Addendum of Focussed Changes of the Regulation 19 Local Plan</u>	
FOCUSSED CHANGE 6	Summary of Responses
SUPPORT	6
OBJECT	17
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • ECC supports the amendment to ensure proposals must demonstrate the deliverability of the wider garden community. ECC also supports the requirement that 'Proposals that are not part of the larger cross-boundary site, and do not demonstrate the deliverability of the wider garden community, will be refused. (Essex County Council; PSLPA40) • Focused Changes 2 to 6 deal with the changes to the Plan to reflect the elevated risk around the delivery at West of Braintree GC. CCC supports these changes and notes the commitment to an early review should the delivery to the West of Braintree restrict the Council's ability to meet the housing requirement within Policy SP3 and Policy SP5. Focused change 6 to Policy SP8 West of Braintree Community provides additional wording in relation to the land within Uttlesford for the Garden Community not being deliverable on its own without the land in Braintree District Council's area. This is noted as the garden community straddles the District boundary with Braintree District Council and should come forward as a comprehensive package to ensure all supporting infrastructure is delivered. CCC has no further comments to make on the additional changes. CCC continues to be supportive of the approach taken in the Local Plan and do not raise any objections under soundness or legal compliance. (Chelmsford City Council; PSLPA60) • This change is strongly supported as it will help to ensure that the garden communities will be delivered in a comprehensive and holistic way which can ensure that the necessary infrastructure and community facilities are delivered at the same time as the housing development. As set out in the policy a Development Plan Document will be produced for the Garden Community which will provide a detailed basis for any future planning applications. (Braintree District Council; PSLPA60) • We welcome the additional text which seeks to reflect the elevated risk around the delivery at West of Braintree and provide clarity regarding the need for a strategic cross boundary approach.(Historic England; PLSPLA244) • The Andrewsfield New Settlement Consortium (ANSC) has consistently supported the West of Braintree Garden Community (WBGC) as a cross-boundary development. ANSC continues to work with Galliard Homes (the promoter of additional land forming part of the area of search within Uttlesford controlled by Galliard Homes) as well as with Braintree and Uttlesford District Councils and with North Essex Garden Communities to plan for a cross-boundary development. Whilst ANSC fully endorses the approach of the West of Braintree Garden Community being a cross-boundary development, it is submitted that land only within

	<p>Braintree District (and therefore excluding the Uttlesford land), could reasonably be delivered as a new Garden Community. ANSC does not currently envisage bringing forward land controlled by ANSC within Uttlesford District as a garden community development without the Uttlesford land being part of a larger cross-boundary development.(GL Hearn; PSLPA233)</p> <ul style="list-style-type: none"> • North Essex Garden Communities Ltd (NEGC Ltd) was established to deliver the Garden Community proposals contained in the shared strategic Section 1 of the Braintree District Council, Colchester Borough Council, and Tendring District Council Local Plans which includes the proposal for the West of Braintree Garden Community. The company is wholly and equally owned by the aforementioned three district authorities as well as Essex County Council. Â In response to the consultation NEGC Ltd objects to Focussed Changes 1-6, and Focussed Change 9 of the Addendum of Focussed Changes to the Uttlesford District Council Local Plan (Reg 19) on the grounds that the changes are not necessary to make the plan effective and are therefore unjustified. Â NEGC Ltd considers the West of Braintree Garden Community as being fully achievable and presenting no elevated risks to delivery as is stated in the Focussed Changes. In order to elucidate these grounds for objection NEGC Ltd would like to be afforded the opportunity to submit evidence for consideration at the Examination, as well as provided with the opportunity to appear at the relevant Examination hearing sessions. (Colchester City Council; PSLPA162)
<p>SUMMARY OF REPRESENTATIONS IN OBJECTION</p>	<ul style="list-style-type: none"> • The proposed change seeks to further restrict delivery of sustainable sites in favour of the delivery of the West of Braintree Garden Community whose delivery is already in doubt. The proposed change makes the plan less effective and less flexible forcing an early review of the Local Plan rather than dealing with the issues up front. (Plansurv; PLSP8) • In view of the above considerations SPC consider that Policy SP 8 is not sound because it is not: a) consistent with national policy. b. positively prepared, c. justified or d.effective (JB Planning / Stebbing Parish Council; PSLPA82) • This change requires that proposals for the Garden Community are capable of demonstrating its deliverability. This is considered a fair amendment however it underlines the importance of having the appropriate evidence for deliverability of the site. At present, the Local Plan’s evidence base has not demonstrated deliverability, so this essentially reinforces our soundness concerns as expressed elsewhere within these representations. (Pegasus Planning / Bloor Homes; PSLPA112) • Following the Examination of the North Essex Authorities Joint Strategic (Section 1) Plan, CPRE welcomed the Planning Inspector’s conclusion that the Garden Community proposals contained in the Plan are not adequately justified and have not been shown to have a reasonable prospect of being viably developed.

	<p>His assessment of the evidence highlighted the significant and fundamental shortcomings which were expressed at public consultation stages and in written representations as part of the Examination process. In particular, CPRE considered the Plan to be “unsound” in relation to sustainability issues; the scale of the proposals (with likely adverse impact on existing settlements and the natural environment); loss of high quality agricultural land; uncertainties about trunk road improvements and other infrastructure requirements. CPRE also agreed with the Inspector’s view that simultaneously bringing forward three Garden Communities on the scale proposed in the submitted Plan is difficult to justify and to deliver. If the Inspector felt that it was too ambitious for three local authorities working together to attempt to deliver three new Garden Communities, then CPRE suggests that for a small authority (i.e. Uttlesford DC) to be attempting to plan for three new communities of the scale proposed would appear to be an even more ambitious and spurious undertaking. It is, therefore, considered neither realistic nor feasible for the District Council to seek to deliver three new Garden Communities. The proposed Garden Community allocations, without further supporting evidence, continue to appear to be an attempt to allocate sites based on availability rather than considering sustainable, deliverable development according to the requirements of the NPPF. Without a good public transport link to enable West of Braintree, residents to travel to employment in Saffron Walden or Stansted Airport and no local station for rail, commuters to London, Cambridge, Colchester, Harlow or Chelmsford, almost all journeys would need to be made by car. This conflicts with national planning policy and will bring significant congestion to the A120 junction, M11 junction and the local road network. However, the Inspector has stated that the Garden Communities could not be developed in full without additional strategic road capacity and the timing for delivery of such strategic infrastructure improvements is unknown. Because of the high level of uncertainty over the future of West of Braintree GC, CPRE welcomes the cautious nature of the proposed changes to the wording of the policies relating to the GC. However, since the Braintree element fails on Viability, Deliverability, Sustainability and Transport all the same reasons apply for the UDC element and CPRE has to ask the question: in such circumstances, can UDC actually proceed with the proposed West of Braintree Garden Community? (CPREsex; PSLPA106)</p> <ul style="list-style-type: none"> • 2a. Reserve sites to cater for the non 2b. delivery of the West of Braintree Garden Community GC Should be included for 2c. Not considered effectively as impact of non-delivery or lateness of Garden Communities not catered for. 2d. No reference to NPPF July 2018. (Go Holdings; PSLPA150) • There is an over-dependency on the garden communities and an
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	<p>over-ambitious expectation as to timing/delivery. The proposed delivery of 970 dwellings in the plan period as proposed for the WoBGC is clearly flawed and unsound given the findings and conclusions of Inspector Clews who examined the North Essex Authorities “Strategic Section 1 Plan”(June 2018). (PSLPA216)</p> <ul style="list-style-type: none"> • Focused Change 6, Galliard agrees that all proposals should demonstrate how they would be delivered in the context of the wider garden community, and, by definition, they will be part of the larger cross-boundary site. That doesn’t mean that every proposal, or phase, has itself to be cross-boundary. The justification for this proposed change in policy suggests the Council believes development only in Uttlesford is not sustainable. Galliard disagrees with this and draws attention to the MHCLG Prospectus again where paragraph 5 “Scale“ explains that Garden Villages can provide for 1,500 to 10,000 homes. The ultimate capacity suggested by the Council for Uttlesford is 3,500, and Galliard has consistently taken the view it can deliver around 1,500 homes in the plan period. It has never agreed with the figure of 970 in the local plan on which it was not consulted. That is an arbitrary allocation and is being used by the Council as a basis for pushing back the first delivery of homes in its trajectory. <p style="text-align: center;">Furthermore, the following “new village” schemes have been the subject of funding under the Government’s previous Prospectus; Denethorpe, E Northants, up to 1,500 homes Longcross, Runnymede, Surrey Heath 1,300 homes Oxfordshire Cotswolds, West Oxfordshire, 2,200 homes All well below the 3,500 to be provided ultimately in Uttlesford, and in addition; Dunsfold Airfield, Surrey has an allocation in the recently-adopted Waverley Local Plan and has been granted outline planning consent for 1800 homes.</p> <p>We attach evidence prepared by Gerald Eve to demonstrate that a development of in the region of 1,500 homes within Uttlesford is viable in its own right, although, to re-affirm, it would be Galliard’s intention for this to represent early phase(s) of the wider cross-boundary garden community of West of Braintree, as anticipated by policy SP 8. The full garden community master plan would be drawn up in collaboration with the local authorities, infrastructure providers and the local communities. Notwithstanding the comments of the N Essex Plan Inspector, a very much more positive view of West of Braintree should be taken than in the Focused Changes. Proper recognition should be given to the relatively straightforward provision of initial infrastructure to begin the delivery of homes when compared to other proposals of a similar scale, both as described in policies SP 6 and SP 7, and the other two new communities in N Essex, especially on the Colchester-Braintree borders. This you will be aware has slipped way back in the delivery trajectory, due to uncertainties over the delivery of new strategic road</p>
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	<p>improvements. In these circumstances, it is even more important that any procedural obstacles to the delivery of West of Braintree are removed. (WYG for Grosvenor; PSLPA178)</p>
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • FC6 should be reworded as follows: Permission will be granted for a new garden community of 10,500-13,500 homes at land West of Braintree. Proposals must demonstrate the deliverability of the wider garden community. Proposals that are not part of the larger cross-boundary site, and do not demonstrate the deliverability of the wider garden community, will be refused. The details and final number of homes will be set out in a Strategic Growth Development Plan Document to be prepared jointly by Uttlesford and Braintree District Councils. Up to 3,500 of these homes will be in Uttlesford. All criteria in this policy relate to the part of the garden community to be delivered in Uttlesford. (Plansurv; PSLPA8) • Policy SP 8 should be amended by the deletion of any reference to West of Braintree from the Garden Community Principles policy. (Stebbing Parish Council; PSLPA82)

<u>Uttlesford District Council Regulation Regulation 19 Local Plan Summary of Representations for the Addendum of Focussed Changes of the Regulation 19 Local Plan</u>	
<u>FOCUSSED CHANGE 7</u>	Summary of Responses
SUPPORT	2
OBJECT	4
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • The change is supported as it ensures that the Plan protects environmentally sensitive sites and meet soundness requirements. (Essex Wildlife Trust; PSLPA42) • Please note: For Special Areas of Conservation (SACs) designated under the Habitats Directive, the IROPI grounds on which a plan or project can proceed depends on the nature of the site that will be affected. Where a plan or project will negatively affect a “priority” habitat or species on a site for which they are a protected feature, the competent authority can normally only consider reasons relating to human health, public safety, or beneficial consequences of primary importance to the environment. Other imperative reasons of overriding public interest can only be considered having obtained and had regard to the opinion of the European Commission. In all other cases competent authority can consider other imperative reasons of overriding public interest including those relating to social or economic benefit in addition to those of human health, public safety, or beneficial consequences of primary importance to the environment. This would include cases where priority habitats and species are present on a European site but they would not be affected by the proposal. (Braintree District Council; PSLPA61)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • The reference to EN8, Protecting and Enhancing the Natural Environment, should be EN7. (PSLPA31) • In view of the above considerations we consider that Policy EN 8 is not sound because it is not “consistent with national policy”² “positively prepared”, “justified” or “effective” (Stebbing Parish Council; PSLPA83) . • Epping Forest SAC - Changes to policy EN8 (third paragraph) “ Natural England notes the updated wording to this policy to include the need for an Appropriate Assessment where mitigation measures are proposed to address impacts on designated sites, such as the Epping Forest SAC. Natural England supports this requirement, however it should be clear that a Habitats Regulations Assessment should be undertaken where there are potential impacts to designated sites as a result of a plan or project, not just where mitigation measures are proposed; the policy wording therefore needs to be amended accordingly. Such wording needs to be included in the policy itself, it is not sufficient to include the wording in the supporting paragraphs.(Natural England; PSLPA 61)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Amend reference to EN8 to read EN7 (PSLPA31) • Where a site of International designation for nature conservation importance is adversely affected by the proposals, permission will be refused unless the District Council is satisfied that: there are

	<p>imperative reasons of overriding public interest, which could be of a social or economic nature, sufficient to override the harm to the site; or, there are imperative reasons of overriding public interest relating to human health, public safety or benefits of primary importance to the environment. (Essex Wildlife Trust; PSLPA42)</p> <ul style="list-style-type: none">• The justification to this change in policy should also make reference to the Essex RAMS. Where development falls within this Zone of Influence for recreational impacts, mitigation measures, including appropriate contributions will need to be sought in line with this strategic solution (Natural England; PSLPA248)
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<u>Uttlesford District Council Regulation Regulation 19 Local Plan Summary of Representations for the Addendum of Focussed Changes of the Regulation 19 Local Plan</u>	
FOCUSSED CHANGE 8	Summary of Responses
SUPPORT	1
OBJECT	5
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> The change is supported as it ensures that the Plan protects environmentally sensitive sites and meets the soundness requirements. (Braintree District Council; PSLPA62)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> The “Proposed Change” outlined does not clearly reflect the reasons for the focussed change as outlined in Section 1.2 (3) on page 3 of the Addendum. It is recommended that the wording on page 3 is adapted and included in Policy EN15. (Essex County Council ; PSLPA41) Focussed Change 8 “Changes to policy EN15 (additional criterion) “Natural England welcomes the addition of a broader criterion for air quality impacts on designated sites. We would refer you to our previous letter dated 13th August 2018 for full comments in relation to the issues relating to air quality impacts on the Epping Forest SAC. Work is still on-going to determine the extent of air quality impacts to Epping Forest SSSI, SAC and therefore it is advised that a precautionary approach be taken, further comments on this are expanded on below in the context of the Habitats Regulations (Natural England; PSLPA250)
MODIFICATION REQUEST	<ul style="list-style-type: none"> Delete the “Proposed Change” outlined in the Addendum and replace with the following wording. 10. Adequate information has been submitted for the Council to undertake an appropriate assessment to demonstrate that the Air Quality of Epping Forest SAC will not be adversely affected by the proposed development. This may include provision of mitigation measures. (Essex County Council; PSLPA41) Policy EN 15 should be amended affecting the air quality of habitats or species of other sites of importance. (Natural England; PSLPA250)

<u>Uttlesford District Council Regulation Regulation 19 Local Plan Summary of Representations for the Addendum of Focussed Changes of the Regulation 19 Local Plan</u>	
<u>FOCUSSED CHANGE 9</u>	Summary of Responses
SUPPORT	2
OBJECT	21
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • This change is noted and it provides the Plan with the necessary flexibility to deal with any delays or alterations to the garden communities including West of Braintree. The change does not mean that UDC are not committed to the garden communities, but provides a fall-back position to adopt if necessary. As such BDC supports the change. However the wording of the change needs some clarity and therefore we suggest the following text; If it becomes apparent one or more of the Garden Communities is significantly delayed, or is not deliverable, and should that restrict the Council's ability to meet the homes and jobs required then the Council will undertake an early review of the Local Plan to consider how these requirements can be met; That focussed changes 1, 3 and 10 are noted and supported by Braintree District Council. (Braintree District Council; PSLPA63) • Focussed change 9 considers the action to be taken by the Council, through an early review of the Local Plan, if one or more of the Garden Communities is significantly delayed, or is not deliverable. It is notable that focussed change 9 is inconsistent with focussed changes 1 to 5 which only make reference to the West of Braintree Garden Community. It is submitted that focussed change 9 represents an appropriate focussed change, and that focussed changes 1 to 5 should also be amended to refer to the eventuality of the West of Braintree, Colchester Braintree Borders or the Colchester Tendring Borders Garden Communities being delayed or a change in circumstance resulting in part of one of more of the three Garden Communities being delivered. (GL Hearn PSLPA234) • We welcome the addition of a new appendix to highlight which policies are strategic and which are not. We welcome the identification of policies EN1 and C1 as strategic policies. It might be even clearer if this differentiation was also made next to each policy within the main body of the local plan, for example by the addition of the letter S next to strategic policies. This approach has been used by a number of other local authorities. (Historic England; PSLPA249)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Anglian Water is the sewerage undertaker for the North Uttlesford and West of Braintree Garden communities. We are also sewerage undertaker for the part of the area which forms part of the Great Easton Garden Community as identified in the Regulation 19 Local Plan. The proposed change amends the wording of Policy M2 to state that if one or more garden community is significantly delayed or is shown to be undeliverable a Local Plan Review will be undertaken. In addition the North Essex Authorities are to review the timing of the proposed garden communities including the land

	<p>west of Braintree garden community (letter dated 19 th October 2019). As drafted the wording of Policy is not explicit about the circumstances in which a Local Plan Review would be triggered and what criteria would be used. (Anglian Water; PSLPA4)</p> <ul style="list-style-type: none"> • This proposed change seeks to require a Local Plan Review if it were to become apparent one or more of the Garden Communities is significantly delayed, or is not deliverable, and should that restrict the Council’s ability to meet the homes and jobs requirements. We raise issue regarding this approach to the West of Braintree Garden Community in our comments to Focused Change 2. Â However, Focused Change 9 seeks to apply this Local Plan Review mechanism to all Garden Communities. Our Regulation 19 representations, and our comments to Focussed Change 4, already identify the flaws with the anticipated timescales for delivery of the Easton Park and North Uttlesford Garden Communities and which necessitate the need to identify and allocate further land for housing in the early part of the plan period. In order to be sound a Local Plan must be effective (i.e. ‘deliverable over its period’) and justified (NPPF paragraph 182). The flaws with the Council strategy raised above, therefore, go to the soundness of the Local Plan. Â Without prejudice to this position, if the Inspector were to consider a Local Plan Review suitable then clear trigger mechanisms and timescales must be applied. (Iceni Projects; PSLPA37) • There are severe doubts that Elsenham could overcome the connectivity disadvantages of its location sufficiently to be regarded as consistent with national policy or effective in being able to secure sustainable development (Examination of the Uttlesford Local Plan: Inspector’s Conclusions , 2.16). In Section 3.67, Table 5, of the Local Plan it is shown that the total number of dwellings built and scheduled in Elsenham is 480 (173 + 307). <p style="padding-left: 40px;">The Parish Council’s analysis indicates that in December 2014 over 400 of these dwellings remained to be built and occupied. In other words, more than 400 further dwellings will be occupied in the village in the period since the Inspector decided that a further allocation could not be sustained. It is apparent that these two recent appeal decisions in effect amount to a repudiation of the methods used in assessing road access in previous housing applications, and point to the fact that approvals for housing in Elsenham already granted must be reckoned to be excessive. (Elsenham Parish Council; PSLPA25)</p> <ul style="list-style-type: none"> • SPC is firmly of the opinion that all of the above evidence fully demonstrates that there is now considerable doubt and uncertainty regarding the suitability and deliverability of the proposed West of Braintree Garden Community allocation within the Plan period. Consequently, it would be inappropriate to seek to rely upon the provision of the proposed delivery of 970 dwellings. As a consequence, the allocation should be removed
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	<p>from the Plan. Furthermore, it is considered that the serious deficiencies in the way and means that the Sustainability Appraisal process has been carried out remain apparent. It is evident from reading the SA Addendum and Spatial Strategy Background Paper that the serious flaws in the SA process identified by the North Essex Joint Examination Inspector with regard to the selection and designation of the Garden Communities (including West of Braintree) have yet to be properly rectified. 74. SPC believes given the significant amount of uncertainty regarding the status of West of Braintree Garden Community and whether or not it will be confirmed eventually as a strategic allocation in the North Essex Joint Spatial Plan, it would be totally inappropriate for UDC to confirm it now, then seek to undertake an early review of the Local Plan to consider how homes and job requirements can be met if the Garden Community is delayed or non-deliverable. Especially given that such a review would occur at some unspecified date in the future, and only when it is judged to have restricted UDC's ability to meet its home and jobs requirements. (Stebbing Parish council; PSLPA86)</p> <ul style="list-style-type: none"> • These changes are similar to that set out in Focussed Change 2 although also refers to the risk of significant delays, undeliverability, or inability to meet housing or jobs targets, as potential triggers for the early review of the Local Plan. Our same concerns and proposed remedy for Focussed Change 2 are equally applicable here (Bloor Homes; PSPLA116) • Natural England notes the recommended changes to reference the potential risk in relation to the West of Braintree Garden Community. Whilst Natural England is not concerned specifically in relation to the proposed wording, the implications of this development not being brought forward need due consideration. The proposed policy wording appears to acknowledge the possibility of the site being brought forward through other means, regardless of allocation within the Local Plan. Whilst Natural England does not raise concern with this in itself we would highlight to you the implications of this in the context of the emerging strategic solution, the Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS). Within the Regulation 19 draft plan, policy SP8 in relation to the West of Braintree Garden community includes wording that requires contributions to be collected towards this strategic solution (see point 9 of this policy). At present this is the only policy trigger for this strategic solution in the Uttlesford Local Plan. As per our advice letter dated 13th August 2018 and the subsequent interim advice sent in relation to the Essex RAMS (dated 16th August 2018 reference 244199) the Uttlesford Local Plan area falls within the Zone of Influence (Zol) for the identified recreational impacts on the Essex coast designated sites. To ensure compliance with the Habitats Regulations, mitigation is therefore required for all new residential housing that falls within this area. Should the West of Braintree development no longer proceed, there would consequently be no other reference to this requirement for contributions. Natural
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	<p>England therefore would reiterate the importance of including an overarching Essex RAMS policy which would be valid in the context of the West of Braintree site coming forward outside of the allocation, or any other development such as potential windfall that may be within this ZoI. Should such wording not be included the plan would be considered unsound and not compliant with the Habitats Regulations (further assessment in the context of the Habitats Regulations is outlined as below). (Natural England; PSLPA249)</p> <ul style="list-style-type: none"> • This is a unique scenario in that there has never been a transition period between two national policy frameworks, and the NPPG is not explicit in how reviews should be carried out of a Local Plan which has been assessed under the 2012 NPPF. UDC anticipates they will submit their Local Plan for examination in January 2019. Given a large number of LPAs are intending to submit their Local Plans at this time, hearings for UDC's Local Plan are unlikely to start until June 2019. Assuming the examination runs smoothly, adoption of the Local Plan is expected to be the end of 2019 or the beginning of 2020. As set out in the representations submitted previously, the housing trajectory for the period between 2022/23 and 2027/28 -and thus will be unable to demonstrate a five year housing land supply for a number of years during the middle of the plan period. This points towards a lack of early delivery sites which are an important aspect of the Local Plan for an LPA which has a track record of underdelivery. This will be further exacerbated in the event that WoB GC does not come forward in a timely manner, or at all. It is clear that UDC are failing to comply with paragraph 47 of the 2012 NPPF in this regard and that the current strategy will not maintain a five-year supply of housing land. The Local Plan therefore cannot be found sound on this basis. If UDC called for an early review of the Local Plan in order to address this undersupply of homes in early 2023, it would need to issue a Call for Sites and go out to public consultation before submitting to the Secretary of State for examination. Such a significant change in spatial strategy would be best addressed through a new Local Plan. If a Local Plan Review were to be adopted in late 2025 then delivery of dwellings to replace those units allocated to WoB GC, would most likely not occur until 2028. This represents a significant delay in the delivery of a large number of homes within the district.(Village Developments; PSLPA190)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> • Alternative more appropriate wording for focussed change 9 would read: "If it becomes evident that one or more of the three Garden Communities is significantly delayed, or is not deliverable, and should that restrict the Council's ability to meet homes and employment requirements then the Council shall undertake an early review of the Local Plan to consider how these requirements can be met". (GL Hearn PSLPA234) • Delete Focussed Change 9 (Bloomhall / Plansurv; PSLPA9) • Policy M 2 should be amended by the deletion of any reference to West of Braintree Garden Community given the elevated level of risk associated with it, together with significant evidence now

	<p>being available which calls into serious question its suitability (Stebbing Parish Council; PSLPA85)</p> <ul style="list-style-type: none">• If your authority decides to participate in the Essex RAMS strategic solution we would recommend the inclusion of wording along the following lines: Where appropriate, contributions from developments will be secured towards mitigation measures identified in the Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS) which will be completed by the time the Local Plan is adopted. Prior to RAMS completion, the authority will seek contributions, where appropriate, from proposed residential development to deliver all measures identified (including strategic measures) through project level HRAs, or otherwise, to mitigate any recreational disturbance impacts in compliance with the Habitat Regulations and Habitats Directive. Regardless of participation in the strategic solution, compliance to the Habitats Regulations is required and therefore should this wording not be appropriate, we would advise that a similarly worded policy is included, with reference to the requirement for project level HRAs (Natural England; PSLPA246)• Paragraph 61-046-20180913 of the NPPG sets out what LPAs can consider when determining whether policies should be updated as part of a Local Plan Review. It is our suggestion that any Local Plan Review should look at the following:<ul style="list-style-type: none">* The conformity with national planning policy.* Changes to local circumstances; such as a change in Local Housing Need.* Housing Delivery Test performance.* Whether UDC can demonstrate a five year supply of Deliverable sites for housing.* Plan-making activity by other authorities, such as whether they have identified that they are unable to meet their housing need.The amount of considerations which would need to be looked at means that a review would not be sufficient and a brand new Local Plan would need to be progressed. (Village Developments; PSLPA190)
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Uttlesford District Council Regulation 19 Local Plan Summary of Representations for the Addendum of Focussed Changes of the Regulation 19 Local Plan

<u>FOCUSSED CHANGE 10</u>	Summary of Responses
SUPPORT	None
OBJECT	None
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	
MODIFICATION REQUEST	

<u>Uttlesford District Council Regulation Regulation 19 Local Plan Summary of Representations for the Addendum of Focussed Changes of the Regulation 19 Local Plan</u>	
<u>Spatial Strategy Background Paper</u>	Summary of Responses
SUPPORT	1
OBJECT	6
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> Support the Spatial Strategy Background Paper particularly with reference to the conclusions justifying the proposed spatial strategy to plan for 3 Garden Communities. The paper represents a robust and comprehensive explanation of the spatial strategy option testing process that Uttlesford District has progressed since 2015. (PSLPA237 Andrewsfield New Settlement Consortium)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> Consider that the paper clearly explains how the Council arrived at its development strategy but do not fully agree with how that process was undertaken or that we concur with the conclusions. There does not appear to be any attempt to find an alternative site to North Uttlesford GC with fewer impacts on the historic environment since the Regulation 19 Consultation. The table on page 35 of the Paper underplays Historic England’s level of concern in 2015 (Historic England provided initial advice on each of the areas of search. Historic England indicated which areas gave rise to the greatest levels of concern in heritage terms and stated that, of the new settlement area of search options (1-9) they had ‘considerable concerns’ about the development of Areas 1 (M11 Junc 9a east), 7 (North of A120, west of Great Dunmow) and 8 (South of A120) and omits specific reference to Historic England’s comments on specifically the North Uttlesford site in 2017 (‘A site allocation in this location would result in severe harm to the character and historic significance of the area and would irreversibly impact upon the setting of nearby heritage assets. It is unlikely that this can be satisfactorily mitigated given the scale, extent and position of the allocation’). (PSLPA252 Historic England) Text on page 52 of Paper is misleading. Whilst the HIA does indeed indicate a small area for development, it absolutely does not indicate an area for ‘the’ development where impact can be minimised. The statement is misleading and should be removed. (PSLPA185 J Francis) Reserve sites in Felsted (10Fel15 land between Howlands and Jollyboys Lane and 13Fel15 land south of Braintree road) should be considered to cater for the non-delivery of the West of Braintree GC. (PSLPA155 Go Holdings) There is an over-dependency on the garden communities. WoBGC should be replaced by alternative sites. The latest work on the SA is the right time to reconsider the three new communities and whether reasonable alternatives including extensions to villages and market towns have a greater role to play. (PSLPA218 Mr and

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Summary of Representations Spatial Strategy Background Paper

	<p>Mrs A Martin)</p> <ul style="list-style-type: none"> • Flexibility of housing supply is needed an additional sites in Felsted (13Fel15 and 14Fel15) should be considered (PSLPA187 Catesby Estates) • Object to Appendix 3 of the Spatial Strategy and the conclusions relating to 09GtDun15 (Dunmow Park). The site was assessed positively as an alternative site within the SA (ref GtDUN17). It is unclear therefore how the site has been differently assessed in this Paper on grounds relating to sustainable patterns of development, particularly in light of the fact that the site is located considerably closer to the town centre when compared with other allocations in the emerging Local Plan. The Council should amend their assessment of this site so that it concludes that the site would result in a sustainable pattern of development. In doing so, the site should be reassessed as a potential location for a reserve site to meet the housing need in the short term whilst further evidence is gathered in respect of the West of Braintree Garden Community. (PSLPA209 Bovis Homes)
MODIFICATION REQUEST	<ul style="list-style-type: none"> • Reference to the WoBGC should be deleted in its entirety from all parts of the Plan and alternative sites allocated to meet housing need in the District. (PSLPA218 Mr and Mrs A Martin) • Remove the West of Braintree Garden Community from the emerging Local Plan’s housing trajectory. The Council should allocate additional sites to meet the housing need in the short to medium term, whilst further evidence is gathered to demonstrate the deliverability of the West of Braintree Garden Community. (PSLPA209 Bovis Homes)

<u>Uttlesford District Council Regulation 19 Local Plan Summary of Representations for the Addendum of Focussed Changes of the Regulation 19 Local Plan</u>	
<u>Review of Employment Policies Background Paper</u>	Summary of Responses
SUPPORT	1
OBJECT	14
SUMMARY OF REPRESENTATIONS IN SUPPORT	<ul style="list-style-type: none"> • ANSC supports the employment paper as being informative to policies SP4, SP5 and SP8, and that the recommendations from the employment paper should form the basis of further detailed analysis to inform a future Strategic Growth Development Plan Document. (ANSC PSLPA235)
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • We strongly support paragraph 3.76 Regulation 19 Local Plan, 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 2017 HJA report. This scenario supports the provision of 16,000 jobs over the Local Plan period, with London Stansted Airport being the primary driver for this substantive uplift in Uttlesford. Saying this, as specified by paragraph 2.3.14 of the 2018 HJA report, there needs to be greater recognition that London Stansted Airport will be the primary driver for growth in Uttlesford. We object to Policy SP4, stating that provision will be made for a net increase of 14,000 jobs. As the Plan indicates that the Preferred Scenario growth option is the most appropriate growth to plan for, the Policy should reflect the 16,000 jobs figure. 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 positively prepared. The allocation of our Client's site as a Proposed Employment Area will enable Uttlesford to plan positively for future employment growth. (PSLPA144 Pigeon Investment) • We support the findings and recommendations of Hardisty Jones Associates 2018, but object to the decision not to incorporate any of these suggested changes into the Addendum. On the basis that HJA 2018 consider the ELR has serious shortcomings and that the FEMA comprises the most appropriate evidence base, the employment strategy contained in the Regulation 19 Local Plan cannot be considered sound. One of our criticisms of policies EMP1 and SA1 is the strategy to permit non-airport related uses on 55 hectares in the North Stansted Employment Area, on the basis that it is not supported by the evidence base. The FEMA which does not recommend any such strategy. HJA 2018 identifies that the lack of justification for the oversupply created through this strategy could be deemed a risk. We agree with this conclusion and advocate the reasonable alternative of allocating alternative employment land within the

	<p>district, with ready access to the airport. (PSLPA11 WRC Morton Trust)</p> <ul style="list-style-type: none"> • The Hardisty Jones report and the Council's dismissal of its recommendations have done nothing to improve the soundness of the plan. (PSLPA12 K McDonald) • Agree that the 5 recommendations regarding changes to the Local Plan made by HJA 2018 will add clarity to the Plan but do not consider they will address the soundness concerns raised at the regulation 19 stage. In addition, we object to the decision not to incorporate any of these suggested changes into the Addendum. <ul style="list-style-type: none"> ○ Object that HJA 2018 does not suggest that further consideration should be given as to whether the office supply pipeline adequately reflects qualitative needs in line with the recommendations of the ELR. ○ The Hardisty Jones report contains an analysis of the delivery of office and other business space accommodation from the Garden Communities. However, because no amendments are proposed at this stage to the Garden Community policies it is impossible for Examination participants (including the proposers of each Garden Community) to indicate whether they consider any policy change that might arise from the Hardisty Jones report are sound. As such, we continue to have concerns regarding delivery from the Garden Communities. ○ The Hardisty Jones work does not address the desire to foster business start-ups and encourage the expansion of existing businesses which is needed to avoid unsustainable levels of out commuting. ○ The employment strategy at EMP1 fails to address the need for accommodation for small and growing companies and the Hardisty Jones recommendations do not address this shortcoming. ○ Whilst Hardisty Jones have recommended transparently setting out a supply pipeline for B1(a) delivery there is no further information available regarding the timing of this delivery, therefore our concerns regarding the proposed pattern of delivery set out in paragraph 5.20 of the Local Plan have not been addressed by HJA 2018. (PSLPA Jackson Management) • The report highlights the weakness of the data base and points to the need to be much more robust in terms of the evidence base. <ul style="list-style-type: none"> ○ The report acknowledges reliance on employment provision at Stansted North and at Chesterford Research Park – this creates a very narrow focus and exacerbates the risks of failure to deliver if either or both of these sites fail to perform. ○ The preceding reports are acknowledged not to provide an identified quantum of B class employment within the District ○ None of the policies listed provides an overall quantum for employment land requirements
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	<ul style="list-style-type: none"> ○ The FEMA study is acknowledged not to provide the “most Helpful” interpretation as it ignores the impact of Stansted Airport as a primary driver for employment ○ The Local Plan cites 68.4% of out commuting- is this really a sustainable model? ○ There is acknowledged to be no consideration within the ELR of loss of existing stock and consequent impact on the overall supply ○ These issues are acknowledged to underestimate the future requirement- further clarity on both the requirements and how this should be met are suggested recommendations ○ The Garden Community employment provisions are both vague and unquantified both in terms of supply and demand, there are woolly aspirations to create one job per household but no indication of how this might be done and an over reliance on out commuting ○ The levels of proposed B class employment (which would cover office, industrial and warehouse together with R and D) are stated as being assumed to be 30% of all employment – I think this stands out as a woeful underestimation of the requirement and implies that 70% of all employment will be in other sectors. ○ The employment impact of the proposed Garden Settlements is stated to be relatively minor and therefore will not address the importance of employment provision particularly in the short to medium term given the projected timescale of delivery. (PSLPA38 FKY Ltd) <ul style="list-style-type: none"> ● The evidence of HJA 2018 report broadly reflects the ECC Reg 19 representation. (PSLPA43 ECC) ● HJA 2018 supports our view that there is no evidence to support the inclusion of the North Uttlesford Garden Community (NUGC) on the grounds it will provide housing for employment in the Biotech Sector, particularly at Chesterford Research Park (CRP). In summary, this says that <ul style="list-style-type: none"> ○ The overall demand stated for employment in the local plan has been overinflated by an allocation for CRP ○ The allocation for CRP is overinflated and well in excess of the requirements from both studies undertaken. ○ There is no evident need for North Uttlesford (or any other GC) to provide B Use employment land. <p>[References: Section 2.3.7 , 2.3.12 2.3.17, 2.3.21] (PSLPA93 Lt Chesterford PC)</p> <ul style="list-style-type: none"> ● The employment evidence clearly shows that there is no justification for the NUGC from employment from the Biotech sector as stated in the Local Plan. Furthermore, it finds that the employment allocation for Chesterford Research Park is unjustified and therefore the increase in the development boundaries indicated in Policy (PSLPA78 F Wilkinson)
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	<ul style="list-style-type: none">• Surprised to see that there are no additional changes proposed to the Plan in response to this report. Changes in relation to the distribution of planned employment growth across the district could have significant implications for the historic environment and will need to be carefully considered and an opportunity for comment/consultation provided. (PSLPA253 Historic England)• Object that the Local Plan has not been amended in light of HJA 2018 and to the Council's approach to delay making the necessary changes to the emerging draft Local Plan. (PSLPA202 Birchanger Hall Farms)• Object that the Local Plan has not been amended in light of HJA 2018. It is therefore difficult to see how policies SP4 and especially EMP1 may be considered justified, given that the Council's own evidence base work has set out a clear recommendation that amendments are required in the form of additional evidence and revisions to the policies. Significant over provision is provided through employment sites allocated at Chesterford Research Park and North Stansted which each serve specific sectors. Alternative allocations are therefore necessary to help meet employment needs and provide choice and competition in the market for employment land that does not currently exist. Different locations have different attractions to potential occupiers. (PSLPA265/263 Endurance Estates)• On initial review it appears that aggregate supply is well in excess of the assessments of future requirements emerging from both the ELR and the FEMA study. This is largely a result of substantial allocations at Chesterford Research Park and North Stansted. The role of the identified allocations to meet needs beyond the plan period is not explicitly stated and there should be clearer justification around how the need for and supply of employment land interact. (PSLPA186 J Francis)• We object to both Policies EMP1 and EMP2 on the basis that the employment chapter seems to be predicated on the basis of the AECOM ELR's 'medium scenario' requirement for a net additional 10.2 ha of land for industrial use over the plan period to 2033, whereas the HJA 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. In order to be found sound in examination, the Plan needs to contain policies that are clearly written and unambiguous and justified by proportionate evidence. Considering the weaknesses in the AECOM approach to identifying employment need and that the Plan does not clearly identify a total employment needs figure, the Plan conflicts with NPPF paragraph's 16 and 35, which require Plans to be clearly written and justified. We request that the Plan be revised to take into
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	<p>account the higher employment needs figure. (PSLPA143 Pigeon Investment)</p> <ul style="list-style-type: none"> We find it slightly strange that given the comments made by the N Essex Inspector the Council has not chosen to include at least the employment figures for Uttlesford in the GC policies, but has relegated them to the evidence base. We believe it would strengthen the deliverability of the communities if an allocation for employment land was included in each GC policy as the Inspector suggested. (PSLP180 WYG)
<p>MODIFICATION REQUEST</p>	<ul style="list-style-type: none"> Policies EMP1 and EMP2 and SA1 should be amended in light of the recommendations of Hardisty Jones Associates 2018. (PSLPA11 WRC Morton Trust) The recommendation outlined in the Hardisty Jones Associates 2018 report should be actioned and the policy wording amended. However, we do not consider that the recommendations address the soundness concerns we have previously raised and as such the amendments we have outlined within our original representations would still be required in order for the Plan to be found sound. (PSLPA Jackson Management) Allocate additional employment land, in particular, on sites accessible to J8 of the M11, such as the respondent's site at Tilekiln Green. (PSLPA38 FKY Ltd) 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, as reflected in HJA 2018. It is recommended that UDC specify in policy the net quantum of office floor space and industrial land required over the Plan Period, together with the site allocations that will meet this requirement, as part of its submission plan. Clarification on the relationship of the 'net requirements' with the quantum of land allocated at the Northern Stansted Employment Area is also sought. The amendments will ensure a clear and coherent employment strategy that reflects net requirements over the Plan Period, as reflected in HJA 2018. (PSLPA43 ECC) Withdraw Local Plan and start again. (PSLPA78 F Wilkinson) The changes identified as being necessary should be incorporated and a further consultation undertaken on a revised Regulation 19 draft of the Plan. (PSLPA202 Birchanger Hall Farms) Endurance Estates consider that land at Parsonage Road, Takeley, is a suitable location for employment development. (PSLPA265 Endurance Estates)

	<ul style="list-style-type: none">• We request that the Plan be revised to take into account the higher employment needs figure. (PSLPA143 Pigeon Investment)• We believe it would strengthen the deliverability of the communities if an allocation for employment land was included in each GC policy as the Inspector suggested. (PSLP180 WYG)
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<u>Uttlesford District Council Regulation Regulation 19 Local Plan Summary of Representations for the Addendum of Focussed Changes of the Regulation 19 Local Plan</u>	
<u>Sustainability Appraisal</u>	<u>Summary of Responses</u>
SUPPORT	0
OBJECT	10
SUMMARY OF REPRESENTATIONS IN SUPPORT	
SUMMARY OF REPRESENTATIONS IN OBJECTION	<ul style="list-style-type: none"> • Requirements for establishment of compliant Sustainability Appraisal not met; Evidence relied on in Revised SA not clear (PSLPA210 Great Chesterford PC) • It is considered that the Sustainability Appraisal Addendum does not adequately and appropriately assess the Alternatives to the West of Braintree Garden Community not delivering new homes within the Local Plan period. In particular, Alternative 5 (a return to a focus on the spatial strategy options that explored two GCs with more focus on existing towns and villages) was too easily dismissed, with no proper review on the grounds that if a site failed the assessment criteria the first time around it would fail an assessment review. A more detailed review of these sites and any others subsequently submitted should be undertaken in the context that there is a 970-dwelling shortfall that should be met. By way of an example, it is considered that there is land to the east of Newport which offers a sustainable and logical extension to the town and which could be delivered within the Local Plan period. • As a fundamental review of the whole SA is currently underway. As such we reserve our position to comment fully on the SA once the review is published for consultation. (PSLPA120 Landsec) • Natural England welcomes the update to the Sustainability Appraisal (SA) in the context of the focussed changes proposed. As per our comments for the HRA implications of the Essex RAMS, this should also be reflected in the SA with a full assessment of the impacts to the Essex Coast Designated Sites (please see the letter dated 16th August 2018 to your Local Authority for further information.) For the focussed changes in relation to the West of Braintree development, it would be anticipated that should changes to this allocation be made, i.e. either come forward outside of the allocation or alternative sites be sought in its stead that these would be assessed in full at the appropriate time and that a further appraisal would be undertaken with the review of the Local Plan. (PSLPA224 Natural England) • Comments on the <i>Sustainability Appraisal (SA) - October 2018 by Place Services</i> as one of the key documents of this focused addendum now seem to be redundant since it is to undergo a “fundamental update” following a report commissioned by the officers of UDC: <i>Independent Review of the Sustainability Appraisal – AECOM November 2018</i>. We welcome the fact that the officers at UDC have sought to identify the weaknesses in the SA by commissioning this report. (PSLPA93 Little Chesterford PC)

	<ul style="list-style-type: none"> • The SA has not assessed the implications of the up to date employment evidence base (PSLPA202 Birchanger Hall Farms) • It is Galliard’s view that the consideration of alternatives in the SA is open to question because an unjustifiable figure of 970 homes in the plan period at West of Braintree is used as a benchmark. Galliard has consistently promoted around 1,500 as a deliverable figure, and if this is used it could well be that the stated alternative sites, particularly Takeley, are not ‘reasonable’ as they do not have comparable capacity, and greater negative impacts. Nor is it necessarily a matter of adding the shortfall to the other 2 new communities, as higher figures are unlikely to be achievable. An even less attractive alternative would be to allocate land on the edge of existing settlements. One of the principal reasons for selecting the garden community strategy was to prevent more undesirable and damaging add-ons to Uttlesford and Braintree’s high-quality existing towns and villages. (PSLP180 Galliards/WYG) • We do take issue over the statement that the uncertainty regarding West of Braintree is negated by the increased lead-in time for development. The start date of 2025 is not agreed and in fact this trajectory had been put forward without reference to Galliard some time before the N Essex Plan Inspector’s Report was issued. Galliard’s consistent view is that development can commence in 2022 by which time the Inspector’s questions will have been answered. (PSLP180 Galliards/WYG) • What we do agree with is the statement that there could be an increase in speculative development that is not plan-led due to references to the ‘uncertainty’ over West of Braintree. This is not helped by having development beginning so much later in the trajectory compared to the other 2 garden communities. (PSLP180 Galliards/WYG) • Furthermore, we draw attention to the conclusion that all other options to varying extents or for different reasons are unsuitable and if adopted can be expected to lead to uncertain or negative overall impacts. (PSLP180 Galliards/WYG)
MODIFICATION REQUEST	<ul style="list-style-type: none"> •