

<b>Committee:</b>	Cabinet	<b>Date:</b> Thursday, 18 July 2024
<b>Title:</b>	Uttlesford Local Plan 2021 – 2041 (Regulation 19) Submission Version	
<b>Portfolio Holder:</b>	Cllr John Evans, Cabinet Member for Planning, Infrastructure and Stansted Airport	
<b>Report Author:</b>	Dean Hermitage – Strategic Director of Planning Andrew Maxted – Interim Planning Policy Manager	<b>Key decision:</b> Yes

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## Summary

1. This report provides an overview of the Regulation 19 version of the Local Plan and next steps.
2. Subject to the decision of Cabinet and then Council on 30 July, public consultation is programmed for 8 August to 3 October (8 weeks). To account for summer holidays, this is two weeks over and above the six weeks required by statute. The Plan and results of the consultation would then be submitted to Government / Planning Inspectorate.
3. The currently adopted Uttlesford Local Plan is from 2005 and if the new Plan is adopted in 2026 there will have been a twenty-year gap. Plans should be updated every five years and the current Uttlesford Plan is out-of-date.
4. The previous Government signalled its intention to change the Planning System, to include a new approach to preparing Local Plans, but transitional arrangements allow Councils currently progressing Plans to submit their plans up to June 2025. Failure to reach this date may mean a new Uttlesford Local Plan could not be adopted before 2028 at the earliest. The incoming Government has stated that it will take “tough action” to ensure councils have local plans advising that there will be sanctions otherwise.
5. Without an up-to-date Plan there is likely to be more speculative and relatively unplanned development coming forward with less consideration for planning for infrastructure. The level of development / permissions that has come forward outside of a plan in the past three years alone is substantial.
6. The Regulation 19 Local Plan is designed to achieve a number of key aims:
  - to be capable of being found SOUND at Examination whilst reducing any risks, as far as possible, associated with its preparation
  - give consideration to the findings of the Inspectors for the previously submitted, and failed, Uttlesford Local Plans
  - seek to address climate change and bio-diversity emergency
  - support the delivery of sustainable development by maximising

- opportunities for the use of sustainable modes of travel and by providing good access to jobs, services and facilities
  - maximising opportunities for new infrastructure to benefit existing communities, in addition to new residents, in an attempt to start addressing the infrastructure deficit, and
  - include a comprehensive suite of new policies to ensure planning in Uttlesford provides for high-quality development
7. The new Plan makes provision for 3,738 homes at seven proposed strategic site allocations (sites of 100+ homes) located at the three Key Settlements (Saffron Walden; Great Dunmow and Stansted Mountfitchet) and two of the Local Rural Centres, Elsenham and Takeley.
8. The Plan also proposes to support 900 homes on non-strategic site allocations (sites of less than 100 homes) at Newport and at Larger Villages. The relevant parish councils have been given the opportunity to bring forward these allocations themselves via neighbourhood plans if they wish to.

## **Recommendations**

9. That Cabinet:
- (i) Recommend to Council that the Uttlesford Local Plan 2021 – 2041 (Regulation 19) document is published for eight weeks consultation 8 August to 3 October 2024.**
  - (ii) Recommend to Council that thereafter, the Uttlesford Local Plan 2021 – 2041 (Regulation 19) document is submitted to government / PINS for examination.**
  - (ii) Provide delegated authority for the Strategic Director of Planning, in consultation with the Portfolio Holder for Planning, to make any minor corrections prior to consultation, including for typographical and formatting purposes AND to prepare an ‘Additional Modifications’ Schedule for submission if required.**
  - (iii) Note the technical supporting evidence in preparation for publication alongside the Draft Uttlesford Local Plan 2021 – 2041 consultation.**

## **Financial Implications**

10. There are financial implications associated with the preparation of the Local Plan and for the Council once the Plan is adopted. The preparation of the Local Plan falls within the Planning Budget.
11. There would be financial implications associated with delaying the consultation, these will be discussed under ‘risks’.

## Background Papers

12. Evidence base papers are included as appendix 2.

## Impact

Communication / Consultation	The Plan will be subject to 8 weeks of public consultation. A Communications Plan has been approved by the Director of Planning and discussed with LPP. This will ensure the consultation is well publicised with extensive opportunities for interested parties to engage in the consultation process.
Community safety	N/A
Equalities	An Equality Impact Assessment has been prepared as part of the Sustainability Appraisal (refer to list of supporting documents).
Health & Safety	N/A
Human Rights / Equalities	See above – under Equalities.
Sustainability	The Draft Plan has numerous positive implications for sustainability. It seeks to support sustainable development by promoting development in accessible locations that maximise opportunities for using sustainable modes of travel, and sets out policies to support sustainable development, such as relating to climate change, flooding, biodiversity, etc.  The Draft Plan has been informed by a Sustainability Appraisal (refer to list of supporting documents).
Ward-specific Impacts	All
Workforce / Workplace	Within existing workforce resources.

## Situation

### Background and Context

13. The National Planning Policy Framework (NPPF) is clear (Paragraph 33) that Local Plans should be reviewed 'at least once every five years' and that the reviews 'should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy'.

14. The current Uttlesford Local Plan was adopted in 2005 and is demonstrably out-of-date. It is one of the oldest adopted plans in England. The National Planning Policy Framework, which significantly altered the approach to plan making in England, was first published in 2012, and there have been a number of revisions, most recently in December 2023. If the currently emerging Uttlesford Local Plan is adopted in early 2026, there will be a twenty-year gap from the previous Plan.
15. There are a number of implications for the Council in not having an up-to-date plan and that relate to the timetable for the preparation of the currently emerging plan. These matters will be considered in turn.

***Implications for not maintaining an up-to-date Local Plan***

16. NPPF (paragraph 11) makes clear that the 'Presumption in favour of sustainable development' should apply 'where there are no relevant plan policies, or the policies which are most important for determining the application are out-of-date', including 'where the local planning authority cannot demonstrate a five-year supply of deliverable housing sites'.
17. The implications of applying the 'presumption' within paragraph 11 NPPF essentially leads to an increased level of speculative development coming forward. This has been the case in Uttlesford in recent years, where 2005 Local Plan policies have been found out of date. This has been exacerbated by the fact that, partly as a result of the lack of an up-to-date plan, the Council has been unable to demonstrate a five-year supply of deliverable housing sites. For example, the commitments for residential development to be delivered as at 1<sup>st</sup> April 2021 was 3,570, whereas the equivalent figure as at 1<sup>st</sup> April 2024 is 6,812.
18. Even if the Council is able to demonstrate a five-year supply of deliverable housing sites, the 2005 Plan policies are still of some age and the plan is silent on important matters such as water use, biodiversity net-gain, and climate change standards. Essentially, in the absence of an up-to-date Local Plan, the Council has less control over development coming forward.
19. An up-to-date Local Plan will enable the Council to develop a strategy for what development comes forward and where. This will ensure development is located to maximise sustainable development and crucially, to assist in planning for infrastructure (services and facilities, such as for health care/ education/ transport). The new Plan will also include updated policies so the Council is able to influence the quality of what development comes forward and how it contributes to enhancing biodiversity/ addressing climate change, etc.
20. In the absence of an up-to-date Local Plan, it is likely that development will continue to come forward in a piecemeal basis, with the Council having less control or consideration over infrastructure delivery. There is anecdotal evidence that key stakeholders (Education Authority/ Health Providers) consider that planning for new infrastructure on the basis of unplanned and

piecemeal development is much more difficult. There may be a cumulative impact of multiple small piecemeal developments each making a modest contribution to infrastructure that is inadequate for the collective level of growth.

21. The absence of an up-to-date plan has arguably made planning decision-making difficult in Uttlesford. This has resulted in a significant proportion of the council's planning decisions being overturned on appeal, which in turn, has led to the council being designated.

***Implications relating to the timetable for preparing the emerging Plan***

22. The previous Government signalled its intention to make changes to the NPPF and for the approach to plan making in 2023. It stated that details of the new approach will be published in late 2024 and that plans being prepared under the new system will commence in 2025 onwards. This may be delayed or changed as a result of the outcome of the general election. The Labour manifesto indicated that there will be sanctions for councils that do not progress local plans. It has also committed to restoring mandatory housing targets for councils and reforming and strengthening the presumption in favour of sustainable development. The new Chancellor has stated the NPPF will shortly be updated and that the new Secretary of State for Levelling up, Housing & Communities will be writing to councils making clear that universal coverage of local plans and reviews of green belt boundaries "will be expected of them".
23. As such, officers advise that the council should submit ahead of the current June 2025 deadline to be Examined under the current planning system. Under these arrangements, any such Plan will also need to be Adopted by 31 December 2026. The Uttlesford LDS sets out the route needed to be taken in order to adopt ahead of likely transitional arrangements ending:
  - Publication of Submission Plan (Regulation 19): 8 August 2024
  - Submission to SoS: Dec2024/Jan2025
  - Examination: Mid 2025
  - Adoption: Mid 2026

It may well be that under a new plan-making regime Uttlesford would be required to increase housing numbers.

***Previously Submitted Plans***

24. It is also important to stress that two proposed Uttlesford Local Plans were submitted to the Secretary of State in 2014 and 2019, but neither progressed to adoption. In both cases, the Inspectors considered the Plans were not capable of adoption, even with consideration for Modifications. This is a relatively unusual circumstance. It is important the Council consider both the findings of the previous Inspectors, but also the importance of preparing a Local Plan that is demonstrably SOUND with any risks associated with its preparation minimised.

25. The Inspectors to the 2019 Plan raised a significant number of issues, including with individual site proposals and with the Sustainability Appraisal (relating to the 2019 Plan). Of particular note was the concern that:

*“In order to arrive at a sound strategy, we consider that as a primary consideration, the Council would need to allocate more small and medium sized sites that could deliver homes in the short to medium term and help bolster the 5-year housing land supply”, and*

*“This would have the benefit of providing flexibility and choice in the market and the earlier provision of more affordable housing. It would also create a buffer so the target of 14,000 homes is not only just being met by a narrow margin and would allow for a less steeply stepped housing trajectory”.*

### **Uttlesford Local Plan Consultation**

26. Before discussing the proposed Draft Local Plan, it is also worthwhile highlighting the importance of the proposed consultation. One of the overriding aims for plan making as set out in the NPPF (paragraph 16) is that plans:

*“be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees”.*

27. The council consulted on a draft Plan (Regulation 18) at an early stage in plan making and provided interested parties and residents a genuine and meaningful opportunity to contribute and help shape the Councils final version of the Plan. Various changes and improvements have been made as a result of the 1742 respondent’s comments. Example headline changes include (further details are available in the Regulation 18 Consultation Statement):

- Reduction in the number of proposed strategic allocations and the quantum of housing required to be delivered on strategic sites
- Removal of previously proposed strategic allocations at Thaxted – so there are no longer any proposed strategic allocations at Thaxted
- Removal of previously proposed strategic allocations at Newport, being replaced by a lower quantum of development to be planned for through the Neighbourhood Plan. It is anticipated this development will come forward on a series of smaller non-strategic sites
- Significant improvements to the proposed strategic allocations, with greatly improved master-planning, increased areas of open space, extended buffers for any constraints, including for heritage
- The addition of a small allocation at Elsenham to enable the delivery of a new primary school and early years provision
- The addition of a small allocation at Great Dunmow to enable delivery of specialist housing, including self-build/ elderly living and a care home, along with extensive areas of open space
- Reduction in the quantum of housing required to be delivered through non-strategic sites

- Re-classification of villages by ‘settlement’ rather than ‘parish’ which results in five villages no longer being classified as Larger Villages. This means that these villages will no longer be required to plan for any non-strategic housing allocations. These villages are:
    - Ashdon,
    - Great Easton
    - High Easter
    - Manuden, and
    - Wimbish
  - Clarification that Larger Villages will have two years post adoption of the Local Plan (to circa. second quarter 2028) to prepare Neighbourhood Plans thus allowing plenty of time for the Larger Villages to plan for any non-strategic allocations themselves
  - Significant change and extension of the Countryside Protection Zone (CPZ) in comparison to the Reg 18 draft Plan, and an increase on the original 2005 area – this includes reinstating the entire western extent of the proposed allocation at Takeley as CPZ, and
  - Improving the affordable housing policy to increase the focus on rented affordable housing, which is more ‘affordable’ in Uttlesford.
28. The Regulation 19 stage is formally a ‘publication’ stage, where the final plan the Council intend to submit to the Secretary of State is published. Post-Regulation 19 Plan publication, the Council is not able to make any significant changes to the Plan and any responses received on consultation are forwarded to the Inspectors presiding over the Examination for their consideration rather than the Council’s.
29. Subject to the decision at full Council, public consultation is programmed for eight weeks from 8 August to 3 October 2024. To account for summer holidays, this is two weeks over and above the six weeks required by statute. It will include newspaper adverts, an online and social media campaign, early in-person briefings for parish councils (where hard copy material will be given to PCs for display), and in-person public events in the settlements within which strategic sites are proposed.
30. Hard copies of the draft plan will be placed in the district’s libraries and in the reception of the council’s main offices.

### ***The Emerging Uttlesford Draft Local Plan***

31. For the reasons stated above, it is considered imperative that a new Local Plan for Uttlesford is progressed as efficiently and effectively as possible. This Plan should achieve a number of significant objectives:
- to be capable of being found SOUND at Examination whilst reducing any risks, as far as possible, associated with its preparation
  - give consideration to the findings of the Inspectors for the previously submitted, and failed, Uttlesford Local Plans
  - seek to address climate change and bio-diversity emergency
  - support the delivery of sustainable development by maximising

- opportunities for the use of sustainable modes of travel and by providing good access to jobs, services and facilities
- maximising opportunities for new infrastructure to benefit existing communities, in addition to new residents, in an attempt to start addressing the infrastructure deficit, and
- include a comprehensive suite of new policies to ensure planning in Uttlesford provides for high-quality development

### **Housing Need**

32. NPPF (paragraph 61) makes clear that:

*“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for”.*

33. The Council commissioned Justin Garnder Associates to prepare an Updated Local Housing Needs Assessment LHNA which identifies the Local Housing Need for Uttlesford, for the 2021-2041 plan period of **13,500 homes** (180 less than identified at Regulation 18 stage).

34. To determine the level of additional housing to be planned for in the emerging Local Plan, consideration is needed for the current completions (houses that have reached a substantial level of construction), commitments (those with planning permission) and for a windfall allowance (a level of development that we can expect to come forward that are not allocated but that would otherwise be policy compliant). The figures as at 1<sup>st</sup> April 2024 are shown by Table 1.

**Table 1: Housing Supply as at 1<sup>st</sup> April 2024 for 2021 - 2041 Plan Period**

<b>Type of Supply</b>	<b>Number of dwellings</b>
Completions (1 <sup>st</sup> April 2021 to 1 <sup>st</sup> April 2024)	1,802
Commitments (as at 1 <sup>st</sup> April 2024)	6,812
Windfall Allowance (for plan period up to 2041)	1,540
<b>Total</b>	<b>10,154</b>

35. This figure has increased since the Regulation 18 version of the published.

36. In addition to considering any existing and known housing supply (Table 1), it is also prudent to consider planning for a ‘buffer’ (i.e., planning for slightly more housing than the identified need). This provides for some flexibility and resilience and helps to ensure the Council is more likely to maintain a five-year supply of deliverable housing sites into the future.



37. The Local Plan proposes **3,738 additional homes on strategic sites and 900 through non-strategic allocations** which would provide for **14,741 homes** in total within the plan period 2021 – 2041. This equates to 1,241 homes above the identified housing need or, roughly a 9.2% buffer.
38. Inspectors examining Local Plans have regularly considered the provision of a reasonable amount of headroom in housing supply as an important factor when assessing the soundness of the plan.
39. The Planning Inspectors presiding over the 2019 Plan made reference to the importance of planning for some headroom (or buffer); see paragraph 27 of this report (above).

### ***Housing Allocations***

40. The draft Local Plan makes provision for ‘strategic’ housing allocations (over 100 dwellings) and for some ‘non-strategic’ housing allocations (less than 100 dwellings). It is important that the Plan is compliant with national policy and guidance, is mindful of the findings of the previous Inspectors (who identified a need for more small and medium sized sites that could deliver homes in the short to medium term) and the role of communities and for neighbourhood planning.
41. The NPPF (paragraph 66) states that ‘strategic policies should also set out a housing requirement for designated neighbourhood areas which reflect the overall strategy for the pattern and scale of development and any relevant allocations’.
42. Another point of note to Uttlesford is the fact that in the past (including within the proposed 2014 and 2019 Plans) there has been consideration for significant new Garden Communities of varying scales including for c. 5,000 and up to c. 10,000 homes.
43. It is likely that planning for Uttlesford in the long-term will need to give consideration to one, or more, stand-alone Garden Communities; however, at present, this is not required principally as such numbers are not required.
44. Uttlesford will need to update its Local Plan every five years to ensure that it regains control of planning and avoids the issues that have occurred in the past with speculative and piecemeal development. It is important a Plan is adopted as efficiently as possible in the short-term for all the reasons discussed in this report and that seeks to address the circumstances the currently emerging plan faces. However, that does not prevent a future Uttlesford Local Plan from considering longer-term and more strategic matters.
45. It is recommended that work on the next Plan, i.e., to follow the Plan currently in preparation, quickly, with adoption in 2030/31.

46. The approach to identifying site allocations is set out in the supporting Topic Paper. In simple terms, a long-list of sites (in excess of 400) were considered at a high-level and filtered, before shorter lists of sites were subject to more detailed consideration. In actual fact, there were more than enough potential development opportunities at the top two-tier settlements ('Key Settlements' and 'Local Rural Centres') to accommodate the identified level of growth. This ensures that any proposed allocations meet the objectives set earlier in this report and crucially, support sustainable development.
47. Reasonable Alternatives were developed as part of the Sustainability Appraisal (discussed more in the SA). Again, in simple terms, these considered higher and lower growth options at a number of the Key Settlements and Local Rural Centres mainly to facilitate a different scale of infrastructure delivery in each case. Some Local Rural Centres were not identified for any growth (see below).
48. The process described above resulted in proposed site allocations at all three Key Settlements: **Great Dunmow**, **Saffron Walden** and **Stansted Mountfitchet** and two of the Local Rural Centres: **Elsenham** and **Takeley**.
49. There are no proposed strategic allocations proposed at three of the Local Rural Centres of Thaxted, Great Chesterford or Hatfield Heath for the following reasons:
50. Great Chesterford: Sites at Great Chesterford could support sustainable development, but would rely on access from neighbouring South Cambridgeshire. This may be possible and could be considered in the future, but given there is substantial uncertainty concerning the delivery of a Local Plan for Greater Cambridgeshire, there would be uncertainty surrounding the delivery of the site at the current time.
51. Hatfield Heath: This settlement is located entirely within the Green Belt. As there are numerous opportunities to bring forward development elsewhere in the district and outside of the Green Belt. There are not thought to be any 'exceptional circumstances' to justify housing development in the Green Belt.
52. Thaxted: Evidence shows that Thaxted has limited opportunities for expanding infrastructure, such as schools, and is a comparatively less sustainable location within Uttlesford. The strategic site proposed in Thaxted in the draft Regulation 18 Plan is removed.
53. The seven strategic sites are proposed across the five settlements listed above are as follows:

#### **Great Dunmow:**

- The provision of 715 dwellings, including affordable housing, on a high-quality development to the north-east of the town. The development will support a local centre organised around a new riverside park, to include land for a health centre, provision of land for a primary school, and additional bus facilities. The

creation of extensive areas of green and blue infrastructure across the site, including an expansion of the existing woodland to the east of the site. New connections and increased permeability into the existing public rights of way network and wider rural landscape. A second site with 203 dwellings for specialist older persons accommodation and custom / self-build housing, making 918 in total at Dunmow.

**Takeley:**

- The provision of 1,506 dwellings, including affordable and specialist housing on development to the north and east of Takeley and including some land that falls within the Little Canfield parish. No housing is proposed to the west of Smiths Green Lane; only new extensive open space and an extended woodland which will remain CPZ. The proposal would be designed to deliver a single coherent and comprehensive development, providing for a new local centre, to include a new primary school, a new secondary school, as well as a healthcare facility. It includes improved public transport to the airport rail station and enhancement and sensitive planning for heritage assets with substantial buffers.

**Saffron Walden:**

- The provision of 879 dwellings, including affordable and specialist housing on high-quality development to the south-east of the town. The development will make provision for a 3 form entry primary school and expansion to secondary facilities and early years provision, along with a comprehensive package of infrastructure enhancements including a new link road between Thaxted Road and Radwinter Road, green open spaces, new healthcare and leisure facilities, and improved bus services. The site will also provide the first phase of a new Country Park.

**Stansted Mountfitchet:**

- The provision of two strategic sites totalling 325 dwellings, including affordable and specialist housing on high-quality development to the north of the settlement (outside of the Green Belt). The proposal will contribute towards the expansion of the existing schools. The site will also provide a new community facility and new areas of green and blue infrastructure which link the settlement into the natural resources within the wider landscape. Enhanced pedestrian and cycle connectivity along Cambridge Road.

**Elsenham:**

- The provision of 110 dwellings, including affordable, essentially an extension to the sites currently being built out in the settlement. The site will include the safeguarding of land to enable the delivery of a new primary school and early years facility in Elsenham. At present, insufficient land is available for this purpose.

**Newport and Larger Villages (non-strategic sites):**

54. An allowance is proposed for non-strategic sites (less than 100 dwellings) at Newport and our Larger Villages. The methodology for this is set out in a supporting Topic Paper, but consideration was given to a range of factors including population change, planning commitments and the potential for development, including for constraints such as for the Green Belt. On that basis the proposed level of growth in each Larger Village (**Table 2**) varies.
55. Where communities wish to prepare neighbourhood plans, it is proposed that they could, if they wish to, take responsibility for any non-strategic allocations and bring those forward in future neighbourhood plans. All have committed to doing so.
56. For Smaller Villages, the Larger Villages not included in Table 2, below, or any rural settlements below this tier (classified as Open Countryside), there is no expectation that any allocations, including non-strategic allocations, would be necessary. Limited infill development may come forward where consistent with policy. Communities preparing neighbourhood plans could make small allocations if they wished to.

**Table 2: Proposed Housing Requirement figures to be met through non-strategic allocations within the Plan period to 2041.**

<b>Settlement</b>	<b>Residual requirement to be allocated through non-strategic allocations up to 2041</b>
Newport	300
Clavering	122
Debden	29
Felsted	104
Hatfield Broad Oak	115
Henham	121
Stebbing	109
<b>Total</b>	<b>900</b>

### ***Employment***

57. The Council commissioned the consultants ICENI to prepare an updated Economic Needs Assessment. There is a need for 21.7ha for office and research & development (R&D) space. The R&D space will be met at Chesterford Research Park and office space at Stansted, Gaunts End, and Takeley.
58. The evidence suggests a residual need of 31.5ha for industrial and logistics uses. This is recommended to be located at Great Dunmow (5-10ha), Saffron Walden (up to 5ha), and 15ha in the vicinity of Stansted Airport / Takeley.
59. There are five proposed employment allocations in the Local Plan, which are listed below. These proposals meet the identified need in full and are located consistently in line with the updated evidence:

Site Name	Type of Site	Available Development Land (Hectares)
Chesterford Research Park	Research and Development	13.5
Land South of Radwinter Road and North and South of Thaxted Road	General Industrial/ Storage or Distribution/ Office/ Light Industrial	2.5
North of Taylors Farm, North of Takeley Street	General Industrial/ Storage or Distribution/ Office/ Light Industrial	18.0
Land South of Highwood Quarry, West of Great Dunmow	General Industrial/ Storage or Distribution/ Office/ Light Industrial	18.0
Water Circle, Gaunts End, Elsenham	Office	5.5

## Infrastructure

60. It is important the Local Plan makes appropriate provision for infrastructure as part of a coherent and comprehensive overall strategy. One of the objectives for the Plan should be to assist with addressing the infrastructure deficit that has arisen due to the prolonged period with no Plan and where there has been increased speculative and piecemeal development.
61. The proposed site allocations are accompanied by detailed Site Development Templates, which set out the detailed policy requirements the sites would be expected to deliver. This includes design parameters to help ensure the council delivers high-quality development, that gives consideration to protecting our important landscape, environment and heritage, as well as providing for biodiversity, open space, and for new services and facilities, including for health and education. The largest allocations would provide new local centres, that in some instances will include other community facilities along with giving consideration to highways, access and sustainable travel.
62. It is important to consider that the Plan seeks to optimise a wide range of factors and in some instances some compromises may be necessary. For example, new development at Saffron Walden will help to address the infrastructure deficit that has arisen from piecemeal development, this includes the opportunity to provide a link road between Thaxted Road and Radwinter Road that is shown to have positive impacts on traffic flows in the town centre and creates the potential to improve the use of sustainable modes within the town.
63. The development also allows for a 3-form entry Primary School, which not only caters for the proposed allocation, but for other development that is already consented, along with an extensive range of other benefits including making contributions to a new Country Park. Furthermore, new development at

Saffron Walden also helps to ensure we continue to support the businesses, employers and retailers by increasing footfall in the town. However, we cannot plan for a new Secondary School, as that would need several thousand more homes. For that reason, it is proposed that an expansion of the existing school is provided.

64. The Area Strategies set out in Chapters 5 to 8 of the Plan include policies to help plan for infrastructure requirements within each part of the district, and where necessary, also for safeguarding land to ensure that the delivery of these schemes will not be compromised. The Plan is also accompanied by a wide range of technical evidence, including the Infrastructure Delivery Plan, Water Cycle Study, Strategic Flood Risk Assessment, Transport Assessment, and others and these have been informed by engagement with a range of key stakeholders and the Regulation 18 consultation response.

## Policies

65. The Plan now includes around 75 Core Policies (strategic policies) and around nine Development Policies (non-strategic policies) across 12 chapters. These fall into three main categories relating to the Spatial Strategy, the four Area Strategies, and thematic chapters that relate to: Transport & Environment, Economy & Retail, and Building Healthy and Sustainable Communities.
66. The policies set out in the Spatial Strategy are listed below and provide the overarching context for the plan as a whole:
- **Core Policy 1: Addressing Climate Change** – which sets out criteria for development to ensure it responds to the challenge of climate change appropriately
  - **Core Policy 2: Meeting Our Housing Needs** – which specifies the scale and location of new housing, ensuring development is built in the most appropriate locations
  - **Core Policy 3: Settlement Hierarchy** – which classifies the settlements in Uttlesford according to their role and service function
  - **Core Policy 4: Meeting Business and Employment Needs** – which specifies the scale and location of opportunities for economic growth to ensure that sufficient new jobs are provided across Uttlesford in appropriate locations, and
  - **Core Policy 5: Providing Supporting Infrastructure and Services** – which ensures that new services and facilities are delivered alongside new housing and employment.
67. The Area Strategy chapters provide a spatial dimension to the Plan and ensure that anyone interested in particular parts of the district can quickly understand what is being proposed in specific areas. The chapters include some policies relating to any development proposals in these areas, including all the detailed requirements for the proposed allocations (the detail is provided in the Site Development Templates). This ensure the allocations

provide for high-quality development and provide for all the infrastructure and other considerations they need to.

68. The final area of policy inclusion within the plan is the three thematic chapters covering Climate, Transport & Environment, Economy & Retail, and Building Healthy and Sustainable Communities chapters. These chapters include over fifty policies and it isn't practical to consider them all within this report. They are designed to be comprehensive and reflect best practice and are based on updated and proportionate evidence supporting the Uttlesford Local Plan.
69. The following paragraphs provide a brief overview of some of the headline Policies, although they can be read in detail within the Plan document.

### ***Affordable Housing***

70. The Local Housing Needs Assessment identified a need of 675 dwellings per year with a need of 221 affordable dwellings per year within that. That equates to 32.7% of the annual housing need. However, the link between affordable and overall needs is complex and many of those identified as having an affordable housing need are already in housing and thus do not generate a net additional need for a home. If for this reason we exclude existing households, our annual affordable need would be slightly lower.
71. The evidence suggests a need for genuinely affordable homes and advocates more focus on social and affordable rented homes. Updated Viability Evidence identifies some challenges associated with planning for 40% affordable housing with the focus on social rented homes and infrastructure requirements, and for that reason, and for the reasons relating to need, the Policy includes a headline requirement for 35% (with 70% of that to be affordable / social rented). See **Core Policy 56** of the Plan for more information.

### ***Climate Change***

72. Climate Change represents one of the most significant challenges we face and the Local Plan seeks to make a significant contribution to combatting it. Core Policy 1 concerns climate change and the Plan includes a number of specific policies designed to ensure that new development will achieve the highest possible standard of carbon reduction relating to:

**Core Policy 22: Net Zero Operational Carbon Development**

**Core Policy 23: Overheating**

**Core Policy 24: Embodied Carbon**

**Core Policy 25: Renewable Energy Infrastructure**

73. These policies are based on the latest evidence, which benefit from a range of authorities who have successfully adopted climate change. The draft policies also benefit from work undertaken recently by Essex County to assist Local Planning Authorities across Essex to develop similarly effective policies, along with strategic steers given by the Local Plan Panel. The above policies are

some of the most rigorous local plan climate change policies in the country. Furthermore, the draft policies have been considered in the draft viability evidence informing this Plan and found to be deliverable.

### ***Countryside Protection Zone (CPZ)***

74. The Uttlesford 1995 Local Plan introduced a 'Countryside Protection Zone' (CPZ) policy that identified land parcels around the airport that would be protected from development in order to safeguard the 'rural' nature and setting of the airport. It was also included in the 2005 Local Plan. This has been partly successful, and despite significant development at the airport, currently the Country's fourth busiest airport, its surroundings remain predominantly rural.
75. The Plan is seeking to support sustainable development, and thus it is important that strategic housing and employment development is located where they reduce the need for travel and maximize opportunities for sustainable travel choices, such as walking, cycling and public transport. On this basis, it is proposed that the CPZ be amended to ensure the rural setting of the airport continues to be protected, but that the sustainable development proposed by the Plan is removed from the areas protected by the 1995 policy.
76. It is considered that the recent CPZ study undertaken, consultation feedback and other evidence, points to an approach that strikes an appropriate balance between preserving the rural setting of the airport and supports sustainable development in accordance with national and local priorities to support the climate change emergency. The CPZ in the vicinity of Takeley has been increased significantly compared to the Regulation 18 proposals and is covered in **Core Policy 12**.

### ***Environment***

77. To ensure that development within Uttlesford protects, maintains and enhances our natural environment, a range of policies have been included which will seek to ensure the sustainable use of water, support the sustainable treatment of waste, and support increased biodiversity and the protection of valuable habitats. These include:
  - **Core Policy 34: Water Supply and Protection of Water Resources**
  - **Core Policy 35: Watercourse Streams Protection & Enhancement**
  - **Core Policy 40: Biodiversity**
78. The local plan requires new residential development that achieves at least a water efficiency standard of 90 litres per person (most housing in the district currently achieves around 140lpp). Planning proposals which increase the demand for off-site water and sewage service infrastructure will only be granted permission where it can be demonstrated that sufficient infrastructure capacity exists, or where it can be demonstrated that extra capacity will be provided in time to serve the new development prior to first occupation.



79. In addition, new development proposals will be required to demonstrate a minimum of 20% Biodiversity Net Gain (BNG), twice the national requirement.

**Policies Map**

80. The December 2023 update to the NPPF makes provision for ‘in-progress’ Local Plans (including those at Regulation 19) with a policies map and proposed housing allocations to meet housing need, will only have to demonstrate a four-year housing land supply. This applies for two years from the publication date, until 19 December 2025.
81. If agreed by full Council, the Regulation 19 Plan and its proposals map will enable the council to take advantage of having to demonstrate a four year supply of housing rather than the current five year plus 20% buffer.

**Risk Analysis**

Risk	Likelihood	Impact	Mitigating actions
Failure to successfully steer the local plan to submission may result in government intervention and continued speculative development in the meantime.	2 – LDS, project plan and LPP in place.	4 - Lack of an adopted (or advanced local plan) leading to potentially unacceptable development.	Various mitigations in place.

## **Appendix 1: The Uttlesford Local Plan (Regulation 19) Publication Version**

Refer to Separate Documents

## Appendix 2: Evidence Base

Refer to Separate Documents that consist of:

- Local Housing Needs Assessment (LHNA)
- Housing, Economic Land Availability Assessment (HELAA)
- Village Housing Requirement Technical Note
- Site Selection Topic Paper
- Housing Trajectory
- Viability Assessment Report
- Gypsy and Travellers Land Availability Assessment
- Habitats Regulations Assessment (HRA)
- Sustainability Appraisal (SA)
- Climate Change Evidence Study
- Strategic Flood Risk Assessment (SFRA)
- Water Cycle Study
- Green Belt Update
- Country Park/ Sustainable, Accessible Greenspace (SANG) Study
- Countryside Protection Zone (CPZ) Study
- Biodiversity Net Gain Technical Note
- Landscape Evidence Update
- Heritage Assessments
- Settlement Facilities Study
- Employment Land Review Update
- Retail Study Update
- Employment Topic Paper
- Infrastructure Delivery Plan (IDP)
- Leisure – Indoor Facilities
- Leisure – Playing Pitches
- Leisure – Open Space
- Local, Cycling, Walking Improvement Plan (LCWIP)
- Transport Modelling Assessment
- A120 Study
- Sustainable Transport Review
- Duty to Cooperate Topic Paper
- Regulation 18 Consultation Statement