

Uttlesford District Council

**Regulation 18 Consultation Report and
Appendices**

July 2024

Table of Contents

Executive Summary	3
1.0 Introduction	4
2.0 Background	5
Local Development Scheme	6
3.0 Consultation Process	7
Issues and Options	7
Local Plan Panel	7
Regulation 18 Consultation	8
Consultation Processing	10
4.0 Summary of Key Issues	10
Statutory Consultees	11
Key Core Policies	14
Key Planning topics	28
5.0 Conclusion	34
Appendix 1: Link to Local Plan Press Releases and Social Media Posts	35
Appendix 2: Full-page advert to promote the local plan consultation exhibitions	36
Appendix 3: Consultation Summary Booklet Content	39
Appendix 4: Consultation Summaries and Responses	*

*** Available in Separate Document**

Executive Summary

This Statement provides a summary of the consultation undertaken on Uttlesford District Council's Draft Local Plan 2021- 2041 to demonstrate compliance with Regulation 22 (1)l of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The Statement details the consultation stages undertaken on the Draft Local Plan 2021-2041, as follows:

- Public Consultation on Draft Plan (Regulation 18) October – December 2023

The Draft Plan consultation was undertaken in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

This Statement explains the consultation process undertaken on the Draft Plan, including the methods used, the people involved, and the number of representations received. This Statement also sets out a summary of the main issues that have arisen through the Plan's production, and how this has influenced the Publication Version of the plan.

Introduction

1.1. This Statement has been produced to provide a summary of the consultation processes for the Local Plan 2021-2041 and the main issues arising. This Statement has been produced in accordance with Regulation 22 (1) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (“the Regulations”). The Regulations state that this Statement will need to set out the following:

(i) which bodies and persons the local planning authority invited to make representations under Regulation 18

(ii) how those bodies and persons were invited to make representations under Regulation 18

(iii) a summary of the main issues raised by the representations made pursuant to Regulation 18

(iv) how any representations made pursuant to Regulation 18 have been taken into account

(v) if representations were made pursuant to Regulation 20, the number of representations made and a summary of the main issues raised in those representations, and

(vi) if no representations were made in Regulation 20, that no such representations were made.

1.2. This Statement explains each of the consultation stages on the Local Plan in relation to the methods used, the people involved, and the number of representations received. This Statement also sets out a summary of the main issues that have arisen through each stage of consultation and how these have influenced the progression of the Local Plan.

Background

2.1. The Uttlesford Local Plan 2021-2041 will replace the adopted Uttlesford Local Plan 2005.

2.2. The adopted development plan comprises various documents listed below in Table 1, including Development Plan Documents (DPD's) and Neighbourhood Plans, along with documents prepared by Essex County Council. **Table 1** shows which of the adopted documents are being reviewed and replaced by the new Local Plan.

Table 1: Documents which make up the adopted Local Plan 2005 and if these will be carried forward in the new Local Plan 2021 – 2041

Name of DPD	Geographical area	Adoption Date	Under review
Saved policies of the Uttlesford Local Plan 2005	Administrative area for Uttlesford	2005	To be replaced by the Uttlesford Local Plan (2021 – 2041).
Essex Minerals Plan 2014 (DPD)	Administrative area for Essex	2014	Yes – The plan period has been proposed to be extended to 2040 (new plan period to be 2025 – 2040) to take account of the tests of soundness for new plans in national policy. Reg 18 consultation proposed for February 2024.
Essex and Southend-on-Sea Waste Local Plan 2017 (DPD)	Administrative area for Uttlesford and Southend-on-Sea	2017	No – last checked for consistency with national policy in October 2021.
Ashdon Neighbourhood Plan	Ashdon Parish	2022	No
Felsted Neighbourhood Plan	Felsted Parish	2020	A review is being undertaken.
Great and Little Chesterford Neighbourhood Plan	Great and Little Chesterford Parishes	2023	No

Great Dunmow Neighbourhood Plan	Great Dunmow Parish	2016	No
Newport Quendon & Rickling Neighbourhood Plan	Newport, Quendon & Rickling Parishes	2021	A review is being undertaken.
Saffron Walden Neighbourhood Plan	Saffron Walden Town Council	2022	No
Stebbing Neighbourhood Plan	Stebbing Parish	2022	No
Thaxted Neighbourhood Plan	Thaxted Parish	2019	No

2.3. The new local plan will set out the overall development strategy and policies to guide development in the District up to 2041. It will include strategic policies as well as non-strategic policies, housing allocations, employment allocations and other associated infrastructure requirements.

Local Development Scheme

2.4. The Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011) requires local planning authorities to prepare, maintain and publish a Local Development Scheme (LDS).

2.5. The LDS¹ sets out the timetable to produce the Development Plan Documents, including key production and public consultation stages. It must be made available publicly and be kept up to date. This enables the community, businesses, developers, infrastructure providers and other interested parties to know how they can participate in their preparation.

2.6. The LDS updates the previous Local Development Scheme published in October 2020 and updated in October 2023, with a further minor revision in January 2024. It provides information about the Development Plans and other Planning Policy documents the Council plans to prepare.

2.7. The Public Consultation on Issues and Options (Regulation 18) was scheduled for Autumn 2020 and Spring 2021. The Public Consultation of the Draft Plan (Regulation 18) ran from October to November 2023. The next stage will be the public consultation on the Submission Plan (Regulation 19) which is due from July to September 2024. The LDS states that the plan is due to be submitted to the Secretary of State (Regulation 22) in December 2024 and examined in public (Regulation 24) in 2025. The plan is due to be adopted in the second quarter of 2026.

¹ Link to Uttlesford District Council Local Development Scheme. Available: [Microsoft Word - 20240124 Local Development Scheme REVIEWED.docx \(uttlesford.gov.uk\)](#)

Consultation Process

Issues and Options

- 3.1. The first consultation was the 'Issues and Options' stage which ran from November 2020 to April 2021. This stage takes place before any proposals have been developed and asks respondents to consider key issues they would like to be covered in the new local plan.
- 3.2. The Council prepared consultation documents which were uploaded to a consultation portal². These were split into nine key themes including; *where you live, character and heritage, climate change, transport, leisure, culture and healthy lifestyles, biodiversity, local economy, homes, and creating new places and communities*.
- 3.3. All comments received were grouped by theme, analysed, and then used to inform the Council's work on a draft version of the Local Plan and draft policies.

Local Plan Panel

- 3.4. The Local Plan Panel (LPP) is a working group of the Cabinet which may make recommendations but is not a decision-making body. The LPP is a successor body to the Local Plan Leadership Group (LPLG) which stood between 2020 and 2023. The function of the LPP is:
 - to assist the Council in the preparation of a local plan which meets the agreed development needs of the district during the course of the plan period in the most appropriate manner
 - to make recommendations to Cabinet as to the preparation of the draft Uttlesford Local Plan 2021 – 2041, and related planning policy documents, in the light of both documents submitted by officers to the LPP for consideration and any other matters as the LPP sees fit
 - to enable members of the public to address the LPP for a maximum of 4 minutes and to provide a copy of their statement, subject to having registered to speak in advance, and
 - to enable councillors from Uttlesford District Council and Town and Parish Councils to address the Group for a maximum of 5 minutes each and to provide a copy of their statement, subject to having registered to speak in advance.
- 3.5. The LPLG met regularly to inform the Regulation 18 Plan including the October meeting (04/10/2023) where the group recommended the draft Local Plan was considered by cabinet for approval for consultation.

² Link to consultation portal: [Uttlesford District Council consultation portal - Keystone \(objective.co.uk\)](https://www.objective.co.uk/consultation/uttlesford-district-council)

Regulation 18 Consultation

3.6. The draft plan was published on 26th September 2023. A series of evidence base documents were also published to present the evidence which was considered when drafting the local plan. A full list of the documents published is shown in **Appendices 1-3**.

3.7. The public consultation on the draft plan, known as the Regulation 18 Consultation, ran from 3rd November to 18 December 2023.

3.8. To ensure full engagement was taking place, numerous consultation methods were used including public meetings, exhibitions, social media posts and newspaper notices, these are explained in more detail below. The engagement numbers are also shown in the infographic in **Figure 1**.

E-newsletters

3.9. The Local Plan consultation was a topic that featured in various newsletters.

3.10. It was included multiple times in the District News (9 October 10 November & 11 December) and the Local Plan newsletter (28 September, 3 November, 10 November, 24 November & 11 December), as well as being covered in the Members' Bulletin and Staff News. It was also flagged up in the Parish Briefing e-newsletters (31 Oct & 21 Dec).

3.11. In total, links connected with the local plan were clicked/opened 4,103 times via the newsletters. Some individual links – including direct to the consultation portal – were clicked hundreds of times.

News releases & local newspaper coverage

3.12. There were multiple press releases issued on this theme (see links in **Appendix 1**). These gained good coverage in the Walden Local, Saffron Walden Reporter/Dunmow Broadcast and the Bishop's Stortford Independent.



Figure 1 - Local Plan Engagement

3.13. A paid-for full-page advertisement was also inserted in the Walden Local and Reporter/Broadcast to promote the local plan public exhibitions, as shown in **Appendix 2**.

Consultation summary booklet

3.14. An eight-page consultation information booklet, which can be seen in **Appendix 3**, was delivered to 35,000 households in Uttlesford. It arrived on doormats from 20 November.

3.15. The booklet contained high-level summary information about the plan and how people could make comments.

Social media

3.16. A total of 24 related posts were pushed on the UDC social media channels, links to examples of these are in **Appendix 1**.

3.17. These had a combined reach of 23,761 (the number of people who saw the content), an impression hit of 27,188 (the number of times the content was displayed), and an engagement rate of 284 (the number of interactions with our content e.g likes or comments).

3.18. Among the posts was a short video produced with Cllr John Evans³, Portfolio Holder for Planning, to coincide with the first publication of the draft plan (26 Sept). When comparing it across other related content, the reach of the post was high on both Facebook (1,760) and Instagram (386). The engagement rate on both platforms was also high with multiple interactions and clicks.

Drop-in Exhibitions

3.19. Five drop-in exhibitions were held across the District so that residents and businesses could find out more about the proposals in the Draft Local Plan. The events were supported by District Councillors, Planning Officers and the Communications Officer. These were held on:

- Monday 13 November, 5pm to 8pm – Priors Green Community Hall, Bennet Canfield, Little Canfield, Dunmow CM6 1YE
- Tuesday 14 November, 5pm to 8pm – Saffron Walden Town Hall, Market Street CB10 1HR
- Wednesday 15 November, 5pm to 8pm – Manuden Village Community Centre, David Collins Drive CM23 1EH
- Thursday 16 November, 5pm to 8pm – The Dourdan Pavilion, The Causeway, Great Dunmow CM6 2AA
- Monday 27 November, 5pm to 7pm – Newport Village Hall, Station Road CB11 3PL

³ Available to view here: https://youtu.be/BDA_bhBdUuU?si=fUgLDmz7jbDIJGgO

3.20. The events provided the public with further information on the Plan using display boards, maps, the Plan document and supporting documents. Details of the consultation and how to make representations were also provided.

3.21. The content of the exhibitions can be seen online: <https://www.uttlesford.gov.uk/2023-Draft-Plan-Consultation-Events>.

Consultation Processing

3.22. The Council received over 5,000 consultation responses, 4,222 of these comments were made by 920 respondents on Objective⁴, the rest came through a number of emails, letters and developer representations.

3.23. These responses were processed and allocated to the relevant parts of the Local Plan, the local plan policy, chapter or evidence base studies.

3.24. The comments were assigned 'categories' to aid processing, for example comments relating to a proposed site allocation might have categories relating to 'highway issues', 'flooding', etc. The comments were then processed with summaries and officer responses prepared for each individual category.

3.25. If a comment was inputted into the system and it articulated multiple points, the comment was split into its individual parts and each part of the comment was put with other comments talking about the same issue. Then an officer response to that issue was added to the table. A copy of these summaries and officer responses can be found in tables in **Appendix 4**.

3.26. The consultation responses to the Regulation 18 Draft Local Plan have been used to help inform the preparation of the Publication Version (Regulation 19) of the Local Plan that is published alongside this report.

Summary of Key Issues

4.1. Due to the number of comments received during the consultation process, this section of the report focusses on the local plan policies which received the most responses, considered to be the key issues. This includes Core Policy 2: Addressing Our Housing Need; Core Policy 3: Settlement Hierarchy; Core Policy 6: North Uttlesford Area Strategy; Core Policy 10: South Uttlesford Area Strategy; Core Policy 16: Thaxted Area Strategy and Core Policy 19: Rural Area Housing Requirement. The tables including summaries and responses are available in full at **Appendix 4**. Responses from key stakeholders have also been detailed below.

⁴ Objective is an digital consultation software used to register comments.

Statutory Consultees

Essex County Council

- 4.2. Essex County Council (ECC) responded to the Regulation 18 consultation and included some overarching and positive comments. There were also some concerns that included: querying how information about educational requirements provided to the council in mid-2024 arising from new development related to proposed new and expanded school provision, as set out in the Regulation 18 Plan, as well as the quantum of development proposed at a number of settlements.
- 4.3. The main priorities for ECC moving forward are ensuring full consideration is given to education infrastructure to meet the needs of future commitments; ensuring a full understanding and refinement of emerging transport modelling and evidence to inform the Local Plan; check that site policy requirements align and comply with Essex minerals Local Plan, the Minerals Local Plan Review, the Essex and Southend-on-Sea Waste Local Plan, any surface water flood management matters identified by the Lead Local Flood Authority; review and update the Infrastructure Delivery Plan that reflects a final spatial strategy and site allocations.
- 4.4. Further discussions were sought by ECC on the spatial strategy, certain growth locations and site allocations to ensure the distribution and quantum of growth across the district and its location in key settlements can viably support the required infrastructure.
- 4.5. The ECC response included one objection, which was to the proposed development at Thaxted. Development in this location would not enable the delivery of an economically viable primary school and ECC recommended this proposal is removed from the Plan.
- 4.6. ECC aim is to ensure new development fully supports education provision and does not result in a cost burden to ECC, while maximising opportunities for sustainable and active travel.
- 4.7. The response recommends UDC strengthen the significant role that London Stansted airport plays within Uttlesford and its wider strategic role for Essex, the region and the UK economy.

Environment Agency

- 4.8. The Environment Agency (EA) have responded to the Regulation 18 consultation after reviewing the main document as well as the Strategic Flood Risk

Assessment (SFRA), Green and Blue Infrastructure Study, Water Cycle Study and Site Allocations.

- 4.9. The EA would like to see stronger wording of the Council's commitment to managing fluvial flood risk for new development. More detail is requested on protecting functional floodplain from new development where possible.
- 4.10. The response acknowledges and appreciates that a buffer zone has been provided regarding chalk streams. However, for the flood risk policy the EA would hope for a commitment to a natural undeveloped 8-meter buffer to be provided between all new development and the top of the river bank / flood defence / culvert.
- 4.11. The importance of using native species with local provenance in planting schedules is noted and it is suggested this should be added to the biodiversity section of the Local Plan.
- 4.12. The EA state that the further detail should be provided on how smaller features should be incorporated into early site designs and large, deep featureless infiltration / detention basins should be avoided.
- 4.13. Support is given for the ambitious target of 20% for BNG.
- 4.14. The EA welcomes the ambition to achieve 90 l/h/d which aligns with the CaBA strategy and the emerging Greater Cambridge local plan which is aiming for 80 l/h/d. They strongly support going further than the current lowest optional standard of 110 l/h/d.

Natural England

- 4.15. Natural England noted that they appreciated the need for growth within Uttlesford District. However, stated that the location of development should be carefully considered so it avoids adverse effects on key biodiversity priorities including internationally and nationally designated sites. Development should also avoid impacts on local sites such as Local Nature Reserves and priority habitats and species.
- 4.16. Natural England welcomes the strong focus on climate change in the Local Plan. However, they would encourage the inclusion of another core policy that specifically focuses on nature recovery.
- 4.17. Acknowledgement is given to the Green and Blue Infrastructure Strategy which is in a relatively early stage. As the Plan develops it must set out clear, measurable targets for improving the quantity and quality of Green Infrastructure provision in Uttlesford.

Historic England

- 4.18. While Historic England support the conclusions and recommendations for many of the sites, they have questioned the visual/distance-based approach taken to assess the potential harm for a couple of the proposed allocations, specifically Church End East and North-East Takeley.
- 4.19. They have suggested that Heritage Impact Assessments (HIA) should be prepared to identify any heritage assets that could be affected by the development of a given site. This includes assessing their significance, including any contribution made by their setting, and evaluating the impact that proposed development might have on their significance. The Council should ensure that any recommendations for mitigation or enhancement identified in the HIAs are clearly reflected in the relevant site-specific policy.
- 4.20. The response recommends that the Local Plan should include indicators to measure how successful historic environment policies are. These can include preparation of a local list, completion of conservation area action plans and management plans, reduction in the number of assets that are classified as heritage at risk.
- 4.21. Historic England strongly advises that the local authority conservation teams and archaeological advisors be closely involved throughout the preparation of the assessment of the Plan, to advise on local historic environment issues and priorities and opportunities for securing wider benefits for the future conservation and management of heritage assets.

MAG – London Stansted Airport

- 4.22. MAG have identified their key issues with the draft Local Plan and have suggested ways to improve it.
- 4.23. Firstly, MAG believe the Plan should provide a better recognition of the role that the airport plays in the local and regional economy. It should also be added to the list of existing employment sites.
- 4.24. In relation to aerodrome safeguarding, they state that the Plan's approach could be improved by the creation of a specific standalone policy covering the full range of safeguarding matters.
- 4.25. The Plan's policy for noise-sensitive development affected by aircraft and other noise sources should be amended to ensure technical accuracy, reflect best practice and refer to the airport's current and approved future noise contours. The responses also notes that the proposed housing allocation at Thaxted falls

within the airport's noise contours and this does not appear to have been fully considered in the site selection process.

- 4.26. MAG are supportive of the principle of the CPZ as the airport's future needs can be accommodated within its existing boundary.
- 4.27. Concerns are raised over the impact of the proposed Takeley-to-Airport route upon the efficient operation of the airport's roads, cycle/pedestrian safety, deliverability and its value for money. MAG have asked for clarity on the Council's position on airport-related car parking. They have noted that any improvements to the Airport Public Transport Interchange should be explicitly funded by developer contributions and be reflected in the Council's IDP.
- 4.28. Finally, MAG have raised concerns around the strength of evidence supporting the Plan's requirement for 20% BNG for non-residential developments.

Key Core Policies

Core Policy 2: Addressing Our Housing Need

- 4.29. Several comments supported the spatial strategy, and the effort to focus development closer to jobs, shops, services and other facilities thereby summarizing the need to travel.
- 4.30. There were a number of general comments in relation to Core Policy 2 which raised concerns over the division of different community areas in the plan and suggested that there was an uneven split between development in the north and south of the District.
- 4.31. It is suggested that the top tier settlements should be allocated non-strategic allocations, whether they do or do not have strategic allocations. Concern is also raised over what is described as over-reliance on non-strategic sites, especially through Neighbourhood Plans where there is uncertainty over delivery and timescales. It is suggested that more allocations are needed within the Local Plan itself. A few comments raise concern over the lack of specific detail about the non-strategic sites within the Reg 18 consultation, but also reiterate that the number of dwellings to be delivered through non-strategic sites should be increased.
- 4.32. There are a range of comments suggesting that more development should be supported in the rural areas, particularly the smaller villages as well as the Larger Villages. Some comments reference the need for 10 % of sites to be less than one hectare, as identified by the NPPF, and what is described as over reliance on windfalls.
- 4.33. Support was received for the scale of growth identified using Standard Method. Consideration should be given to the over-supply buffer, which should be increased

to at least 10 % (one comments suggests 20 %) rather than just 5 %. Reference is made to the recent lack of a 5-year land supply and the need to build greater flexibility to deal with unforeseen circumstances. The Home Builders Federation (HBF) supports a minimum of 10% buffer in order to ensure that any unexpected changes in the delivery of sites allocated in the plan do not lead to the Council not meeting its housing needs.

- 4.34. Some comments raised concerns over why we need to plan for housing, the harm to the countryside that will 'ruin perfectly beautiful countryside'. Some general objections were also received including that the additional housing is totally unnecessary and that many developers are delivering large houses which doesn't match the need.
- 4.35. A question is raised as to what would happen if the Council resisted the need to plan for housing. It is stated that more housing is needed in the north of the country, but not the south (i.e. in Uttlesford). It is also stated that not enough jobs are being planned for to justify the housing figures and that there are large numbers of empty properties that should be summarized first. It is suggested that Government are about to announce a new planning system that will give Councils more freedom to set lower housing targets and that targets can be lowered where there is evidence any development would harm the local character or require greenbelt development.
- 4.36. On the other hand, it is argued that the housing need should be increased. The standard method figure if applied without a cap would be 15,380 and this is considered a more appropriate figure to plan for. It is suggested that the housing figures do not have full regard to the economic potential of Stansted Airport (now expanding to 43 million passengers per year) and Great Chesterford Research Park which is also set to expand.
- 4.37. Furthermore, it is considered unclear if the Council have had discussions with neighbouring councils and ascertained if they will be seeking assistance to deliver unmet need from elsewhere.
- 4.38. The Uttlesford population growth has grown at a faster rate than seen elsewhere and is roughly double the rate of Essex. Furthermore, there is also significant affordability pressures in Uttlesford which also need to be addressed.
- 4.39. It is suggested that reference to a comprehensive and master-planned approach needs to be clarified and also included in an updated Statement of Community Involvement. The area of confusion seems to relate primarily to the proposed allocation at Saffron Walden that includes area that benefits from outline planning consent. However, it is suggested that any issues can be resolved through amendment ahead of the Reg 19 plan.

4.40. Clarification is also sought on whether the proposed allocation figures are minimum or maximum figures. It is suggested that the allocation figures should be referred to as 'up to' figures.

4.41. There are several comments relating to new settlements. Great Chesterford is described as a sustainable location, with access to a railway station and proximity to employment. Reference is made to the Plan supporting expansion of Great Chesterford Research Park yet there is no housing within the Uttlesford Plan in this area. Saffron Walden is noted as having capacity to accommodate development and that the proposed allocations will complement the existing settlement. Although other comments raise concerns over the proposed allocations in Saffron Walden. It is suggested that development proposed at Takeley is disproportionate and too high and that development at Takeley should be reduced as there are more sustainable locations available elsewhere, that would not have any impact on the CPZ.

4.42. It is suggested that the level of housing apportioned to the Larger Villages should be increased to ensure greater availability of small and medium sized sites. It is suggested that the current 6% level will not provide the level required by the NPPF.

How did the consultation comments inform the Regulation 19 version?

4.43. The Council have updated its Local Housing Need Assessment (LHNA) and this has identified a slightly revised housing requirement of 13,500 for the Plan period up to 2041 (down from 13,680). The completions and commitments figure, i.e., the amount of development since April 2021 that has either been built, or gained planning permission, has gone up from 6,702 as shown in the Reg 18 Plan, to 8,604 in the Reg 19 Plan. That has allowed the Council to remove some sites from the Local Plan, whilst also increasing the buffer (from under 5 % to over 9%). This was strongly recommended by a number of Reg 18 representations including the Homes Builders Federation.

4.44. The main strategic sites to be removed from the Plan are the one's proposed at Thaxted. This proposal generated the only objection included in the ECC reg 18 response, due to the difficulty of planning effectively for school provision at Thaxted. There was also a response from Stansted Airport who identified the sites fell within noise contours for aircraft approaching the Airport.

4.45. The other sites to be removed are from Newport. The traffic evidence identified some challenges here, where the scale of growth needed to deliver appropriate highway mitigation would run the risk of then encroaching on other constraints, such as proximity to the M11 or landscape. The Reg 19 Plan proposes a lower quantum of development overall, but to be delivered on a series of smaller (non-strategic) sites, to be planned through the Neighbourhood Plan. This helps to

ensure development is more able to be accommodated and that an appropriate level of infrastructure provision can be more easily provided (such as expansion of the existing primary school is acknowledged to be achievable by ECC).

4.46. There have also been substantial changes and improvements to a number of the other strategic sites with improved masterplans, significantly enhanced areas of open space, mitigation for constraints, such as for heritage. There has been more work to understand infrastructure requirements and ensure these are planned for effectively with updated and more detailed policies setting out the requirements.

4.47. The housing requirement for non-strategic sites has been reduced from 1,000 to 900, but this includes a requirement for 300 at Newport, so in reality, the requirement for Larger Villages has been reduced from 1,000 to 600. This is in part possible due to the increase in the completions and commitments figures described above.

Core Policy 3: Settlement Hierarchy

4.48. Many comments were received in relation to the Settlement Hierarchy offering both support and opposition. Some consider it unclear how settlements have been scored and that there is no explanation for how the settlement hierarchy has been prepared. Others propose the previous settlement hierarchy is re-instated.

4.49. One comment provides support for the classification of Ashdon as a Larger Village which is described as one of the largest and most sustainable villages within the rural area. Other comments object to the classification of Ashdon with residents spread across four separate villages that do not function as a single place, nor are the services and facilities offered across these settlements easily accessible to residents from different villages. It is also stated that a recent Neighbourhood Plan ratified by the local community is seemingly being ignored.

4.50. A number of objections were raised for the classification of Clavering as a Larger Village. Various details are provided to support this viewpoint, including that Clavering has no public transport and that the nearest health services are in Newport, which is not accessible by public transport. Other comments support the designation of Clavering.

4.51. Concern is raised over the number of homes proposed for Debden. In particular, development being planned for without due consideration for providing new infrastructure and services, in part based on previous experience, where development has taken place without adequate infrastructure. Concern is also raised over the classification of Debden as a Larger Village. It is stated that Debden has no shops and no suitable public transport – traffic issues are also reported.

The nearest GP is in Thaxted that is four miles away. debden has no gas supply and many properties do not have mains drainage. Reference is made to existing planning applications that will already increase the size of the village.

4.52. A number of comments raise concern over the classification of High Easter as a Larger Village stating that there are very few facilities in the village and public transport is extremely limited.

4.53. Several comments raise concern that Littlebury is classified as a smaller village and believe it should have been considered within the 'Open Countryside' category. It is assumed that 'limited infill development' would mean a handful of dwellings. Requests were made for the 2005 development boundary for the settlement to be included in the new local plan. A number of other comments welcomed the classification of Littlebury as a Smaller Village in the Settlement Hierarchy, agreeing that it has not been identified as a sustainable location for development and will not be allocated any specific development sites.

4.54. The classification of Stansted Mountfichet as a Key Settlement is challenged, suggesting that it should not fall in the same category as Saffron Walden and Great Dunmow. It is suggested that Stansted has a limited range of shops and industry and one of its only advantages is access to a railway station. It is suggested that the classification is only designed to facilitate a greater level of development.

4.55. Reference is made to NPPF paragraph 20d relating to protection of the 'natural, built and historic environment'. It is suggested that the draft local plan does not provide adequate protection for 'countryside' and that Core Policy 3 is too vague – using terms like 'the developed footprint', 'existing built areas' and 'open countryside'. It is suggested that more explicit protection for the countryside along with a clear definition is needed. It is suggested that Core Policy 3 does not provide an adequate replacement for the 2005 Plan policy S7 or ENV5 and that this is a serious omission.

4.56. Support is provided for not expanding smaller villages however to avoid these settlements falling into backwater status, it is suggested that neighbourhood plans should be encouraged to support gradual infrastructure expansion, if approved by the local residents. Another respondent raises a strong objection to the policy of zero development at smaller villages. They suggest that smaller villages could be re-classified as those that are relatively close to larger settlements, with access to more facilities, and those that are more remote.

How did the consultation comments inform the Regulation 19 version?

4.57. Based on concerns raised about the settlement hierarchy on some anomalies on service provision, a review was carried out to ensure that the hierarchy reflected the most up to date service provision across the settlements in the district. The methodology was also updated to reflect 'settlement', rather than 'parishes' as many Reg 18 responses suggested that this approach was skewing the outcome and the hierarchy. This is because where a number of Smaller Villages fall within the same parish, they could skew the scoring for the largest to be classified as a Larger Village. The Council agree with this concern and have updated the hierarchy on this basis. This has resulted in five villages moving into the Smaller Village category. These are:

- Ashdon
- Great Easton
- High Easter
- Manuden, and
- Wimbish.

4.58. Even though there are now fewer Larger Villages identified, because the housing requirement for the Larger Villages has been reduced overall, the residual need for housing allocations at the remaining Larger Villages does not need to go up significantly.

4.59. The Council is satisfied that the hierarchy for the top two-tier settlements is appropriate. It is important the Council support the majority of development in the most sustainable locations available for all the reason stated elsewhere.

Core Policy 6: North Uttlesford Area Strategy

4.60. There are several conflicting comments in relation to Great Chesterford. There is support for the lack of development sites proposed at Great Chesterford, noting many constraints to development including access to the M11, the historic environment around the village, the fact that the railway station is located on the southwestern edge of the settlement, and that water supply issues prevent further proposals for strategic development at Great Chesterford. Reference is also made to the poor facilities available at Great Chesterford.

4.61. However, other comments state that the excellent connectivity of Great Chesterford would avoid development contributing to traffic issues and so any constraints associated with the historic environment should be overcome to allow more development at Great Chesterford. Other similar objections refer to the railway connections at Great Chesterford and its suitability for development. It is suggested there will be traffic issues associated with development at Newport and Saffron Walden, but development at Great Chesterford could access the M11 more easily with less impact on local roads and benefit from sustainable travel choices including the railway station. It is suggested that a review of constraints affecting the areas does not justify zero growth at Great Chesterford nor does the evidence support a long-term moratorium on growth.

- 4.62. A landowner has summarised the longer-term potential for the area, particularly in collaboration with Cambridgeshire and offers to work with both Councils to assist with any such longer term planning. The proximity to the Genome Centre and potential for cross-boundary cooperation with Greater Cambridge is highlighted as an opportunity and that the Plan should make sure that employment, housing and infrastructure are coordinated.
- 4.63. Ickleton Parish Council strongly supports the proposal to avoid strategic development at Great Chesterford. It is suggested that the settlement has seen significant growth with little infrastructure and that there are substantial constraints around the M11 and the local road network including in neighbouring South Cambridgeshire.
- 4.64. The draft Local Plan doesn't propose a new garden community at Great Chesterford, which is described as the only option for development in the district. Another respondent suggests the importance of supporting at least one new Garden Community, preferably located at Carver Barracks and developed to high environmental standards. It is suggested that just because a Garden Community was rejected in the previous plan, this doesn't mean that it is an intrinsically bad idea.
- 4.65. A few objections are made to the proposed allocations at Newport. These are described as inappropriate and contrary to previous appeal decisions. It is suggested there are fundamental issues associated with the sites which have not been addressed. It is requested that any development should be deferred to the Newport Neighbourhood Plan.
- 4.66. Another comment provides support for the proposal, suggesting that Newport has both primary and secondary schools, shops, sports facilities, a GP practice and the opportunity to develop good public transport infrastructure.
- 4.67. Several comments raise concern about air quality in Newport, the noise impact associated with the M11 and the quality of the environment locally, including the importance of access to open space, for which development will erode.
- 4.68. Concern is also raised over traffic issues and congestion at the junction of Wicken Road and London Road. It is suggested that almost all traffic from the proposed development will have to use this junction. The existing junction cannot be widened, and the plan does not propose a solution. Another respondent stated that they had no objections per se, but that Newport will need a bypass, or at least not to rely on only one street.

- 4.69. The proposal for a Country Park to the east of Saffron Walden is strongly supported, although some respondents would like to see this added to the maps, so it is clearer and for the local plan to provide more detail. It is suggested that it provides good opportunities to link to the nearby Bridleway network and to enhance the existing Public right of way network. It is suggested that the site should be accessible from both the railway station and town without the use of a private car.
- 4.70. Several comments are made about education in relation to the level of growth proposed in the local plan. There is support for considering the need for new school provision in Saffron Walden, including nursery or pre-primary. There are no Special Schools or any Alternative Provision School anywhere in Uttlesford and these pupils are integrated into the mainstream schools. The local plan is an opportunity to address this deficiency.
- 4.71. A few comments have questioned why land cannot be purchased from Audley End Estate to expand the existing Secondary School rather than trying to provide new capacity elsewhere.
- 4.72. It is also suggested that the policy needs to make specific reference to the 3-form entry primary school and new secondary school capacity.
- 4.73. Consultation with school leaders would be welcomed to help inform the Reg 19 plan and ensure a joined-up strategy is developed.
- 4.74. A general objection to development at Saffron Walden was received. This suggests that the development will be of great detriment to the town with increased traffic and impacts on all infrastructure, including healthcare, education, waste processing, sewage, and water supplies. Another objection suggests that the proposal doesn't make any sense without a relief road to the south of the town linking to Newport Road – yet this area is described as having the highest landscape value.
- 4.75. There are conflicting comments relating to transport and highways proposals in Saffron Walden, but it is suggested that most people will use their car and that the proposals are on the wrong side of town for accessing the wider strategic network and employment. Another respondent provides support for the link road. Some comments suggest that a link road around to the Newport Road would be preferable, along with more roads around the town to the north.
- 4.76. It is suggested that any cycle lanes should be separate to roads to encourage cycling. It is also suggested that is important that any new developments are linked to good bus routes that are fully funded and link to any nearby employment sites.

How did the consultation comments inform the Regulation 19 version?

4.77. It is noted that there was both support and opposition to development at each of the locations where development were proposed. However, the Reg 19 Local Plan does address the most significant issues identified. For example:

- Strategic development at Newport is removed from the Reg 19 Plan. A lower quantum of development will be planned for in the Neighbourhood Plan and it is envisaged this will consist of a series of smaller, non-strategic sites. This helps to reduce any impact, improve opportunities for mitigation, reduce the likelihood of constraints being negatively affected and enabling more effective planning for new infrastructure.
- Strategic development at Saffron Walden is retained, but the masterplan has been greatly improved, the policy detail has been greatly increased to reflect many of the concerns raised and in particular to ensure infrastructure is planned for appropriately. For example, there was considerable opposition towards delivering a new and separate sixth form, but it is now thought the existing secondary school can expand on site. This will allow capacity to be increased at Saffron Walden and is by far the most preferred outcome for a wide range of stakeholders.
- A small additional allocation is included in the Plan at Elsenham, but this is principally to enable delivery of a primary school and early years provision, which has hitherto not been provided. There has been a significant level of growth at Elsenham through completions and commitments, so a modest additional allocation is helpful to enable infrastructure delivery.
- The developments at Stansted Mountfitchet have been retained, but the scale of development has been reduced from 390 to 325, with improvements to the masterplanning and policy detail.

Core Policy 10: South Uttlesford Area Strategy

4.78. Core Policy 10 accounted for the largest proportion of the comments received during the Regulation 18 consultation, the key points are discussed below.

4.79. Several comments welcome the proposed Country Park at Easton Park as a way to relieve visitor pressure on Hatfield Forest. However, many urge that this historical area of open space is retained for public enjoyment. The size of the new Country Park will have to be large to provide a valid alternative recreational and environmental space to equal the draw of Hatfield Forest.

4.80. There are requests that the Country Park is created before any residential allocation sites commence. The Trustees of the Gardens of Easton Lodge Preservation Trust, Little Easton are concerned that especially with the planning approval of the 1200 homes at Easton Park there would not be any future implications for the Gardens arising from this development, such as higher demand to access the gardens, which cannot be met with the current facilities or major change to the operating model.

- 4.81. Several comments were received in relation to education in South Uttlesford. It is considered essential to provide for secondary schooling as part of the allocations, as the new site for the Helena Romanes school will not provide for additional places. Clarification is sought on the nature of the new school proposed at Takeley to ensure there is no overlap in catchment with Helena Romanes. There are also suggestions that one single establishment to combine the new Helena Romanes and the proposed Takeley school would provide greater economy of scale and the opportunity to expand the curriculum breadth of academic, technical and vocational studies, plus the inclusion of a sixth form.
- 4.82. Questions have been raised about locating a secondary school abutting the A120 boundary fence because of air and noise pollutions where the latter may exceed WHO recommendations.
- 4.83. The additional primary school planned in Takeley would mean there will be three primary schools located close together in the west of the town, with children in the east having to travel a greater distance to school. Concerns were raised for children's safety around schools arising from parking and drop-off points, and the lack of safe walking routes to school. Suggestions were also made that a new primary school towards the south of the town is needed.
- 4.84. There has been support for the recognition of South Uttlesford as a "significant location for employment" and the allocation of three employment sites in Core Policy 10 to complement the existing employment facilities. The Employment Strategy does not mention Northside consent for 195,100 sqm on 61.86ha which is on non-airport-related B8 and E(g), B2 with supporting uses. UDC should consider this area functionally as the south Uttlesford employment centres along with the Weston Homes office development and the Little Canfield Bluegates Distribution Centre. Several respondents consider that the Takeley Street employment site is not required and would impact on the environment and heritage in the area, putting added pressure on the B1256 which is used as the transport route for local quarry lorry movements.
- 4.85. In relation to the Countryside Protection Zone (CPZ) and Stansted Airport, concern is raised that the allocation of sites and the dilution of the CPZ might favour some sites hitherto precluded if the policy retained wider boundaries. With a proposed 1600 houses in Takeley this major change in the area also questions how sustainable or desirable the environment would be for new housing so close to the airport, with the impact of noise, pollution, and airport traffic.
- 4.86. There is support for the proposed amendment to the CPZ area because it is thought to strike an appropriate balance between preserving the rural setting of the airport and support for sustainable development in accordance with national and local priorities. There are insufficient employment opportunities to support the Dunmow proposal where it is estimated that 1700 jobs would be required to support this development alone and because of this there will be a high number of car

journeys-to-work despite sustainable travel proposals. Developing an employment site to the south of Dunmow would give easier access to the road network with suggestion of a preferred alternative site along the A 120 corridor on the Uttlesford and Braintree District boundary, and to allocate a proportion of the 30 hectares in this highly sustainable location, at the juxtaposition of the A131 and A120 only some 10 minutes from Dunmow town.

4.87. Support is provided for the sustainable transport objective but with the withdrawal of bus services this will be difficult to achieve, this is said to be an unrealistic aim of the South Area Strategy because of shortcomings in road safety, bus services, everyday cycling, and difficult access to the airport by cycle or on foot. New sites should be located close to railway stations, though Stansted Airport railway station is not easy to access particularly on foot or bicycle. The proposed school at Takeley will encourage additional car use from student drop-offs and rat-running through local villages. Relatively poor transport infrastructure in rural areas unable to support increase in traffic.

4.88. Concern raised over increased traffic using Start Hill and going through Great Hallingbury arising from proposed employment uses on top of existing commercial uses such as Meadway Industrial Estate and Thremhall Priory. Combined with the quarry lorries at 400+ aggregate HGV movements through Start Hill, as they are not permitted to use the airport roads to Elsenham. High Roding Parish Council expressed concern over knock-on effect of development on the wider network including the B184 through High Roding which suffers with local speeding.

4.89. In terms of impact on heritage, some comments query why the largest amount of development is located close to the Grade I Listed building of Warish Hall and the Scheduled Monument where it will destroy the countryside setting of the heritage assets and of the Essex Protected Lane (one of the highest rated in Essex) as well as a detrimental effect on the character of the countryside around the Conservation Area of Smith's Green. Respondents believe there is a conflict with the Council's Corporate Plan that advocates a custodian approach to the district's rural environment.

How did the consultation comments inform the Regulation 19 version?

4.90. It is clear the Reg 18 consultation identified a high level of opposition for development, particularly at Takeley. However, the Reg 19 Plan does set out a number of significant changes which address the majority of the concerns raised. These include:

- excluding development from the western parcel of land, thus providing more effective protection for the heritage asset and enabling expansion of the Ancient Woodland, and reinstating this area within the Countryside Protection Zone (CPZ)

- the CPZ is greatly expanded from the Reg 18 version and there are even proposed increases from the 2005 version. It has been found that appeal decision have not always been supportive of the CPZ and that it has been eroded significantly by speculative development. The new policy and proposed area will greatly improve its effectiveness
- the proposed school is re-located away from the A120
- the policy is improved, including the need for development to support Garden Village principles on this site to ensure it is planned for comprehensively, achieves high quality and environmental standards and delivers appropriate infrastructure, and
- the masterplan is greatly improved, with increased areas of open space and more detail added to improve its effectiveness.

4.91. There was also opposition to development at Great Dunmow, but again the Reg 19 proposes a series of significant changes and improvements. These include:

- removing development from the whole of the southern extent of the site
- this greatly increases the level of open space that can be provided, including a Country Park, with improved consideration for landscaping and for the environment
- a small additional site is included to the west of the originally proposed allocation, but this also includes extensive areas of open space, which can connect with the adjoining site and thus provide improved access to open space and enhance wildlife protection, and
- the additional site also provides for specialist accommodation needs, elderly living, care home, some self-build plots, this providing for a specific identified need in Uttlesford.

4.92. Other key changes including safeguarding land to provide opportunities for accessing the A120 directly from employment development proposed at Takeley Street and enhancing detail and policy detail in the Plan to improve the effectiveness of the proposals.

4.93.

Core Policy 16: Thaxted Area Strategy

4.94. There are a significant number of comments which state that Thaxted is not a sustainable location for development. An increase of 489 dwellings is considered excessive due to the extent of previous development which has occurred and the nature of the existing settlement.

4.95. Numerous comments claim that the draft Local Plan has not taken account of the made Thaxted Neighbourhood Plan, particularly in relation to its consideration of landscape evidence that was used to support the Neighborhood Plan.

4.96. There are a significant number of comments which relate to development beyond site allocations. They claim that the countryside beyond the existing settlement and the draft allocations are not sufficiently protected from further development by the Local Plan. Some comments referred to the likelihood of infill development between the allocations and the solar farm to the north east.

- 4.97. Concern has been raised about the prospect of flooding in Thaxted. It is stated that the recent increase in development has seen an increase in flooding, with the water and sewerage capacity described as being at capacity. One comment states that the Council should have applied the sequential test in relation to surface water flooding when allocating sites.
- 4.98. Several comments state that the proposed allocations at Thaxted would harm the historic environment. Specific reference is made to the preference of retaining unrestricted views of the Grade I listed Church of St John the Baptist and John Webb's Windmill as well as the setting of the Conservation Area. Some comments state that the priority for Thaxted should be to preserve its heritage, rather than accommodating development.
- 4.99. In relation to the allocation at 'Land North East of Barnards Field', several comments mentioned the need to stipulate that only vehicular access should be taken from Bardfield Road and that Copthall Lane should not be used for this purpose. One comment suggests that, of the two vehicular access to this allocation, one requires third party land and the other appears too narrow.
- 4.100. Several comments were also received in relation to the allocation at 'Land North of Holst Lane'. These state that a singular point of access off Holst Lane is insufficient to serve 339 dwellings and a school, whilst an access off the B1051 has previously received objections from Essex County Council. Some comments state the allocation is too far from the centre to walk. One comment questions why this allocation is not accessible from Moscotts / Burns Way and requests details on the impact of traffic flows onto Sampford Road and its Junction with Walden Road. Lastly, there is a query related to how the proposed primary school would be serviced.
- 4.101. Many respondents stated that Thaxted Primary School is oversubscribed, and the financial resources do not exist to develop a new school. A 1-form entry school would not be sufficient to accommodate the new dwellings proposed.
- 4.102. Core Policy 16 does not make provision for a new healthcare facility and the current doctor surgery is also at capacity.
- 4.103. The existing highways infrastructure within and surrounding Thaxted is said to be unsafe, at capacity, and unable to accommodate additional traffic. Comments commonly reference the B184 in this context, with some citing the tension between its retail offering and its role as a throughfare. Moreover, a lack of parking availability within Thaxted is mentioned several times.

How did the consultation comments inform the Regulation 19 version?

4.104. As described above, the proposed strategic sites at Thaxted are removed from the Reg 19 Plan. These sites were the only proposal to receive an objection from ECC. This means there will be no development proposed at Thaxted in the Local Plan.

Core Policy 19: Rural Area Housing Requirement

4.105. In general, there is support in principle for the approach in Core Policy 19 including the broad areas for development and process for making allocations through the Regulation 19 Plan or Neighbourhood Plan process. There are a couple of comments which offer support in principle but raise also concern regarding the scale of development and whether there is support from Parish Councils to make the allocations.

4.106. A number of comments relate to the commitments and completions data for Henham and Elsenham. They state there is inconsistency with the way that completions and commitments data has been prepared for the larger villages, which has carried through into the Core Policy 19 Rural Area Housing Requirement Figures. This is most apparent at Henham Parish, which contains a significant number of completions and commitments adjacent to Elsenham built up area. Furthermore, the decision in Core Policy 3 for Elsenham to have no further strategic development should mean that Henham also receives no further development. A few other general comments point out that the commitments and completions data in the plan, upon which the Core Policy 19 Housing Requirement Figures are based, are out of date.

4.107. Some comments refer to the inconsistency in with the way that the settlement hierarchy and service scoring data has been prepared for Elder Street and Wimbish which has carried through into the Core Policy 19 figures. At Elder Street and Wimbish Parish the data is presented for the Parish when Elder Street and Wimbish are smaller settlements with a significant MOD presence where many facilities are not accessible to the public.

4.108. One comments states that the impact of developing infrastructure on strategic sites has not been taken into account and another comment claims there has been no consideration of the impact on local infrastructure in calculating the figures in Core Policy 19.

4.109. There are a number of comments relating to Neighbourhoods plans, firstly that Core Policy 19 does not support Neighbourhood Plans in making allocations and ignores existing Neighbourhood Plans. There is also thought to be a lack of clarity over the timeline for Neighbourhood Plans to be prepared which allocates housing sites to meet the housing requirement set out in Core Policy 19. Some Parish Councils have confirmed their positions with Clavering Parish Council stating they

will prepare a Neighbourhood Plan and allocate sites as well as Stebbing Parish Council. Hatfield Broad Oak have objected to Core Policy 19's approach and intend to identify their own housing need and site allocations in a new Neighbourhood Plan. While Ashdon Parish Council wishes to be involved in discussions about non-strategic allocations, they have not committed to delivering a Neighbourhood Plan. Debden Parish, High Easter and Great Easton and Tilty will also not be preparing Neighbourhood Plans therefore non-strategic allocations will need to be made by the Council.

4.110. There are a number of comments which question how the village housing requirement figures were calculated. Several comments object to the housing requirement figure for High Easter, Clavering, Debden, Ashdon, Hatfield Broad Oak, Ashdon and Stebbing. While other comments state that the housing requirement at Henham, Felsted and Manuden should be higher. There is a specific objection to developing a site on All Saints Playing Field in Ashdon.

4.111. There are queries as to why the green belt around Hatfield Heath has not been re-assessed to provide a larger village housing requirement figure and concerns that the requirement does not take account of Green Belt at Great Easton.

How did the consultation comments inform the Regulation 19 version?

4.112. This matter is largely covered earlier in this report. The Settlement Hierarchy has been updated so that five villages move into the Smaller Village category and will no longer require any non-strategic allocations. The housing requirement for Larger Villages comes down from 1,000 to 600, this the remaining Larger Villages do not have to plan for significantly more housing. And, its worth noting that the level of housing planned in the Larger Villages for the remainder of the Plan period is a substantial reduction to what has come forward in next 2 to 3 years (since April 2021) in the absence of a Plan, and that would undoubtedly continue without a new Plan.

Key Planning topics

Core Policy 1: Addressing Climate Change

4.113. In general, there is strong support for the principle of CP1 and the overall climate change objectives.

4.114. Clarification is needed in the Climate Change and Sustainability Statement (CCSS) to make its requirements proportionate to the scale of development beyond the two categories identified for below and above ten units; this needs to be explained that it refers to 'minor' and major' development. There are suggestions that additional categories are added so the requirement for the small and medium developers are not unnecessarily onerous. A few comments agree that the requirement for the CCSS is an efficient way for the Council to determine whether a development is policy compliant, but queries how this would work in practice. As a requirement for validation, a template or guidance note would be

useful and clarify the level of information that is proportionate to each type of development with assurance over who would be assessing it.

- 4.115. A number of comments oppose the use of the best and most versatile agricultural land for development, and the implications this may have on food security and domestic food production.
- 4.116. Several comments welcome the focus on protection of the natural environment and role in carbon capture but urge the inclusion of another policy that focuses on Nature Recovery. Policy wording should be strengthened to include 'enhancement' as well as 'protection' to capture the biodiversity duty under the Environment Act 2021. The Local Plan should recognise the role of green infrastructure in aiding climate change adaptation such as natural flood management, reducing air pollution, tree planting. Policies should set out appropriate nature-based solutions for climate mitigation and adaptation such as woodland/wetland creation.
- 4.117. There is general support for the policy and encouragement of wildlife corridors and connectivity including the Big Green Internet project for hedging between Epping Forest and Maldon linking Hatfield Forest and Easton Park. There is further commentary that eco homes and the adoption of SUDs should be compulsory to avoid private maintenance charges.
- 4.118. Several comments note that the policy wording needs to be reviewed. Respondent asserts that there is no mention of solar panels, nor heat pumps as an expectation for new builds, nor disabled access and a contradiction between two paragraphs 4.10 and 4.15 regarding net zero requirements for re-using existing buildings.

How did the consultation comments inform the Regulation 19 version?

- 4.119. Several consultation comments noted that the policy wording needs to be reviewed to express a greater commitment to tackling climate change. This has been reflected in the Regulation 19 version, with an overall strengthening of policy wording in a number of cases that reflects a greater show of support for policies that address climate change. This is reflected in, for example, the added measure of electric charge points in domestic and public spaces rather than just the electrification of small vehicles. The start of the policy has also been reworded to reflect this renewed vigour, now saying that development proposals must demonstrate how they will support "radical" reductions in greenhouse gas emissions and contribute to achieving local and national climate targets.
- 4.120. Another important change of note in the policy is the additional focus on climate adaptation and resilience, rather than just mitigation alone, which a number of

consultation comments stressed the importance of that although this is addressed elsewhere in the Local Plan (v – implementing the cooling hierarchy and the overheating policy CP24; viii in CP1 covers promoting the efficient use of natural resources and CP 35 addresses Water Supply; the required Climate Change Sustainability Statement (Table 4.1 and para 4.15) which sets out topics to be included in development proposals requires overall consideration ‘adaptation’), this has now been added to the policy.

- 4.121. The revised policy also puts greater emphasis on active travel, adding “it is acknowledged that with the existing rural settlement pattern across the district, use of the car will continue but the plan aims to increase and to provide for a greater element of travel choice.”
- 4.122. Likewise, with biodiversity, although also discussed in CP40: Biodiversity, the revised plan explicitly mentions the requirement for biodiversity net gain to go over what is statutorily required at 20%” for development proposals. This goes beyond national requirements, demonstrating the commitment Uttlesford is making to matters relating to biodiversity in response to a number of comments that suggested biodiversity is being eroded by building into countryside so any policy must be strong.
- 4.123. Health and wellbeing is another area which has benefited from a strengthening in policy wording. The new plan now states that “proposals should have regard to integrating the Sport England ten Principles of Physical Activity”.

Core Policy 40: Biodiversity

- 4.124. A number of general comments were received concerning BNG provision. In relation to the Plan seeking 20% BNG rather than 10% as set out in national policy, some comments supported this, including the EA and Natural England and others objected. One representation referred to the Government’s opinion that 10% strikes the right balance between the ambition for development and reversing environmental decline. MAG London Stansted Airport stated that the percentage increase would need to be evidenced including the local need and opportunities for a higher percentage; viability for development; and policy implementation. As with others above, most additional comments contest the delivery of BNG at 20%, as it’s over the minimum requirement of 10%, and is not evidenced or justified. One comment suggested the evidence base is out of date and another noted that it did not account for the Metric 4 that BNG calculations are now required to be assessed against.
- 4.125. Anglian Water supports the policy requirements for Biodiversity Net Gain (BNG), and the links to the Green and Blue Infrastructure Strategy and emerging LNRS to guide any offsite requirements to ensure opportunities for priority areas for nature recovery can be summariz.

4.126. A number of comments raised issues relating to viability and deliverability of the BNG proposed policy. These included the lack of justification for going above national policy requirements. The lack of consideration in viability proposals for non-residential development including for employment proposals. Some comments suggest the Council has underestimated the cost of delivering 20 % BNG. The assumption that 20 % BNG relates to 2.86 % of the build cost is questioned. It is also suggested that the BNG policy could threaten the Councils affordable housing policy.

How did the consultation comments inform the Regulation 19 version?

4.127. The Regulation 19 version again reinforces the importance of biodiversity as a central tenet of Uttlesford's strategy, something that was well received by many respondents to the Regulation 18 version. This is reflected by the policy that now more clearly sets out how development will be required to demonstrate a minimum of 20% Biodiversity Net Gain calculated using the most recent Statutory Metric, rather than 10% as set out in national policy. In response to those who have queried this approach, the Council considers 10% BNG the point at which biodiversity enhancements become meaningful at a landscape scale. Local authorities are encouraged to require more than 10% where strong evidence of need through past habitat and species losses and of feasibility is provided. UDC is currently collating evidence to support the requirement of 20% Biodiversity Net Gain and has considered the issues raised by Natural England. Biodiversity Net Gain will again be required for watercourses, hedgerows and other terrestrial habitats. These measures, in addition to the emerging Essex Local Nature Recovery Strategy, will ensure that biodiversity enhancements bring meaningful enhancement. The revised plan also demonstrates explicit support for the creation of BNG units in locations of strategic importance according to the Statutory BNG metric.

4.128. Wording of the new policy provides greater protection to "Irreplaceable Habitats" (such as ancient woodlands, ancient & veteran trees, lowland fens etc.) by stating that development that impacts these areas will not be approved unless in exceptional circumstances and where significant, bespoke mitigation is deemed appropriate as determined by UDC.

4.129. A number of comments commented on the need for a requirement for developers to maintain and manage natural areas and newly created habitats, where these are integral to development. The policy now includes wording requiring a stewardship arrangement, and the potential need for off-site BNG units, to be discussed with the local planning authority at the earliest opportunity.

4.130. Following comments regarding aviation safety, the Regulation 19 version now makes explicit mention of the need to safeguard aviation activity within the

Stansted Airport Protection Zone by stating that “consideration must be given to airport safeguarding (e.g. bird airstrike avoidance) when creating new habitat within the Stansted Airport Protection Zone including consultation with stakeholders representing Stansted Airport, as any proposals that may attract water fowl and other birds could present problems.

4.131. The revised plan also now makes reference to the Essex Local Nature Partnership commitments, ensuring that the plan is integrated with the goals at the county level. Likewise, there is reference to national schemes also, such as the National Recovery Network (NRN).

Core Policy 56: Affordable Dwellings

4.132. A large proportion of comments relate to the proposed affordable housing ratio of 35%, claiming it is insufficient and should be increased. Comments note a number of reasons to increase the ratio, namely the increasing housing affordability pressures in the district, particularly for young people; to be in line with certain adopted Neighbourhood Plans; to guard against negotiations which seek to reduce affordable housing contributions at application stage; allocations will not come forward quickly enough to cool local house prices through increased supply; and other Council’s have adopted a 40% affordability requirement. A few comments suggest that the requirement for 35% affordable housing should be viability tested, taking account of the higher energy efficiency standards held within the plan, the proposed tenure split, and the M4(3) requirement.

4.133. It is not guaranteed that the proposed housing will be genuinely affordable, particularly for first time buyers. Particular emphasis is placed on the need for more smaller homes.

4.134. One comment suggests that social housing has not been accounted for within the Local Plan whilst being supported within the evidence base. Several comments raise that the proposed affordable housing mix in Core Policy 56 results in an undersupply of affordable/social rent when compared to affordable home ownership. A higher percentage of affordable/social rented properties should apply to residential developments, to then be retained in perpetuity. Several comments suggest this is necessary as other types of affordable home products are not always genuinely affordable. One comment provides a suggestion as to how the policy could be reworded to increase affordable rented housing in light of the viability evidence gathered. Lastly, a comment suggests that the ‘shared equity’ schemes should be ruled out of any potential affordable housing mix within the policy.

4.135. Some comments have outlined that the policy should be worded such that applicants should only need to ‘have regard’ to the Local Housing Needs Assessment (LHNA), not definitively ‘accord’ with it. Other comments have outlined

that the policy wording should be made sufficiently stringent to avoid deviation from the LHNA within future planning applications.

How did the consultation comments inform the Regulation 19 version?

4.136. The main change between this policy as it appears in the Regulation 18 Local Plan compared to the Regulation 19 version is an alteration to the specific tenure mix of affordable homes. Several comments suggested that the 70:30 split (for the remaining qualifying development following the 25% First Homes allocation) of affordable / social rented to other forms of affordable homes would lead to an undersupply of affordable/social rent housing stock. Several comments also suggested that this is particularly important as other types of affordable home products are not always genuinely affordable. Therefore, following a review of the consultation comments, this has been changed to a 90:10 split to ensure there is a strong pipeline of affordable/social rent homes coming through, especially when compared to affordable ownership homes.

4.137. There was a mix of responses regarding wording of policy surrounding the Local Housing Needs Assessment (LHNA) proposals on dwelling mix, with some suggesting that applicants should only need to 'have regard' to it whilst other argued the policy wording should be made sufficiently stringent to avoid deviation from the LHNA within future planning applications. The sentence "the dwelling mix should be in accordance with the most up-to-date LHNA (Table 11.1) unless an alternative approach can be demonstrated to be more appropriate where proven to be necessary due to viability constraints" was removed, however the sentence following this was maintained, stating that that "the exact tenure split on each site will be a matter for negotiation, taking account of up-to-date need assessments and the characteristics of the area". Overall this wording provides more clarity to the policy and strikes a balance between the two viewpoints by ensuring developments take account of up-to-date LHNAs, whilst still providing flexibility within the approach.

Conclusion

- 4.1. In conclusion, this statement has demonstrated how Uttlesford District Council has effectively engaged with stakeholders for the Regulation 18 Consultation (Town and Country Planning Act 2012). It summarises the key issues raised in the consultation from consultees and looked at some of the key policies and how they have been amended based on these comments.
- 4.2. As well as summarizing some of the key issues, the appendices to this report also shows how individual responses to all the issues raised in the consultation have been considered. This follows the council's commitment to respond to every issue raised.

Appendix 1: Link to Local Plan Press Releases and Social Media Posts

Press Releases

19 September – Uttlesford prepares to take back control as consultation approaches for new draft Local Plan: <https://www.uttlesford.gov.uk/article/8827/Uttlesford-prepares-to-take-back-control-as-consultation-approaches-for-new-draft-local-plan>

26 September – New draft Uttlesford Local Plan presented to councillors ahead of consultation: <https://www.uttlesford.gov.uk/article/8847/New-draft-Uttlesford-Local-Plan-presented-to-councillors-ahead-of-consultation>

31 October – Draft Uttlesford Local Plan approved for public consultation: <https://www.uttlesford.gov.uk/article/8926/Draft-Uttlesford-Local-Plan-approved-for-public-consultation>

6 November – Draft Uttlesford Local Plan drop-in exhibitions: <https://www.uttlesford.gov.uk/article/8949/Draft-Uttlesford-Local-Plan-drop-in-exhibitions>

28 November – Uttlesford Draft Local Plan drop-in exhibitions: <https://www.uttlesford.gov.uk/article/8976/Uttlesford-Draft-Local-Plan-drop-in-exhibitions>

19 December – Uttlesford Draft Local Plan consultation closed: <https://www.uttlesford.gov.uk/article/9013/Uttlesford-Draft-Local-Plan-consultation-closed>

Social Media Post Examples

19 December – Facebook Uttlesford Draft Local Plan consultation closed: <https://www.facebook.com/share/p/XgvfnqFYXbNFzivT/>

19 December – Instagram Uttlesford Draft Local Plan consultation closed: <https://www.instagram.com/p/C1B2B2ErGJa/?igsh=Mjk3aWFjcDB3aDFnn>

Appendix 2: Full-page advert to promote the local plan consultation exhibitions



The Uttlesford Draft Local Plan Consultation

The consultation on the first draft of our new Local Plan for Uttlesford (Regulation 18) is now open.

A Local Plan is a district-wide plan which identifies the vision and aspirations for the future of the area, planning policies, and identifying the sites or areas which can be developed and those which should be protected.

Further details, including The Draft Plan, evidence base and background studies, and the different ways in which people can have their say, are available at:

www.uttlesford.gov.uk/2023-Draft-Plan-Consultation

Exhibitions

A number of drop-in exhibitions have been organised so that residents and businesses can find out more about the proposals within the new Uttlesford Draft Local Plan.

The events are on:

- **Monday 13 November, 5pm to 8pm** - Priors Green Community Hall, Bennet Canfield, Little Canfield, Dunmow CM6 1YE
- **Tuesday 14 November, 5pm to 8pm** - Saffron Walden Town Hall, Market Street CB10 1HR
- **Wednesday 15 November, 5pm to 8pm** - Manuden Village Community Centre, David Collins Drive CM23 1EH
- **Thursday 16 November, 5pm to 8pm** - The Dourdan Pavilion, The Causeway, Great Dunmow CM6 2AA



The consultation period runs until 5pm on 18 December 2023

Appendix 3: Consultation Summary Booklet Content



Welcome to the Uttlesford draft local plan consultation.

We are getting closer to taking back control and being able to stem the tide of speculative development - each step taken towards adopting a new local plan is a step in the right direction for the district.

Our draft plan sets out a vision for how Uttlesford should develop and grow until 2041, taking into account the unique nature of the district and also climate change.

Uttlesford is a wonderful place with a rich rural and historic heritage, but it's also home to cutting-edge science and technology. It's a great place to live, work and visit.

There are some tough decisions that need to be made, but getting the public's constructive feedback on this draft will be a key part of the process as we continue to refine and shape the plan.

This is not the final version of the plan - it is a set of draft recommendations that look to realise the long-term aspirations for Uttlesford.

This consultation is the next stage of the process for producing our plan. We would like to involve everyone who has an interest in the future of our district and give them the chance to comment.

I encourage everyone to have a say on the proposals and let us know their views.

John Evans
Cllr John Evans
Portfolio Holder for Planning



What is a local plan and why do we need one?

The new Uttlesford Local Plan gives us an opportunity to plan positively for the future of the district.

It is important we plan for sustainable development that helps to address the climate change emergency, enhances biodiversity and protects the environment, but also ensures everyone can afford somewhere to live and have a job.

Alongside these things, we must also plan for appropriate infrastructure (services and facilities), such as for schools, healthcare and leisure.

The current local plan was adopted in 2005 and is now out of date. This has meant the council has had less control over planning for the district and it is more difficult to deliver infrastructure.

This is why there has been more speculative development across Uttlesford in recent years. The new local plan will help us to overcome these challenges.

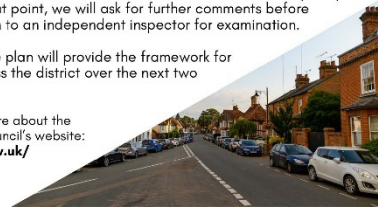
We must prepare a plan that plans for an appropriate number of jobs and homes, alongside supporting infrastructure.

The draft plan is accompanied by a wide range of technical and other evidence including infrastructure and transport assessments. The evidence will continue to be refined and updated as the plan progresses.

Once this consultation is finished, we will use the feedback to help shape a final draft. At that point, we will ask for further comments before submitting the plan to an independent inspector for examination.

Once adopted, the plan will provide the framework for development across the district over the next two decades.

You can find out more about the local plan on the council's website: www.uttlesford.gov.uk/local-plan-faqs



Our emerging strategy

The council needs to prepare for 13,680 homes over the next 20 years - a figure calculated in accordance with the government's standard method - although about 8,000 of these have already been built or have planning permission.

Therefore, with a built-in buffer (which is common practice in local plan-making and provides flexibility), this draft plan proposes allocations for 6,076 additional homes over the plan period 2021 to 2041.

We need to make sure that we plan for this development in the most sustainable way, minimising the need for travel and maximising opportunities for walking, cycling and public transport.

Homes need to be sustainable, near to jobs, shops, services and other facilities.

We need to support existing town and village centres and ensure any new infrastructure benefits as many people as possible.

We also need to ensure the plan meets all the government's requirements and we must have a range of sites of different sizes, type and location.

For these reasons, our draft plan has a focus on development in the most sustainable existing locations, with strategic development proposed at Great Dunmow, Newport, Saffron Walden, Stansted Mountfitchet, Takeley and Thaxted.

Some non-strategic development is also proposed in our larger villages.

The plan does not propose any development in the smaller villages, other than very modest infill, nor in open countryside.



As well as delivering the quality of homes that people expect, we must make sure the homes being provided meet the needs of our residents - in terms of affordability, size and type.

Affordability is a key issue and the plan seeks to ensure that 35% of the housing allocation is affordable for local people.



Supporting a sustainable economy

The plan seeks to provide a positive policy framework which supports jobs, business and investment to build a strong and competitive economy.

The aim is to encourage large and small-scale opportunities in appropriate locations.

Taking into account existing employment floorspace commitments (which have planning permissions), the plan proposes 5ha of office floorspace and up to 30ha of industrial floorspace in the district.

A number of sites have been allocated for this - in Elsenham, Great Dunmow, Little Canfield, Saffron Walden and Takeley - with enough flexibility built-in to cope with any changes in economic circumstances and market conditions.

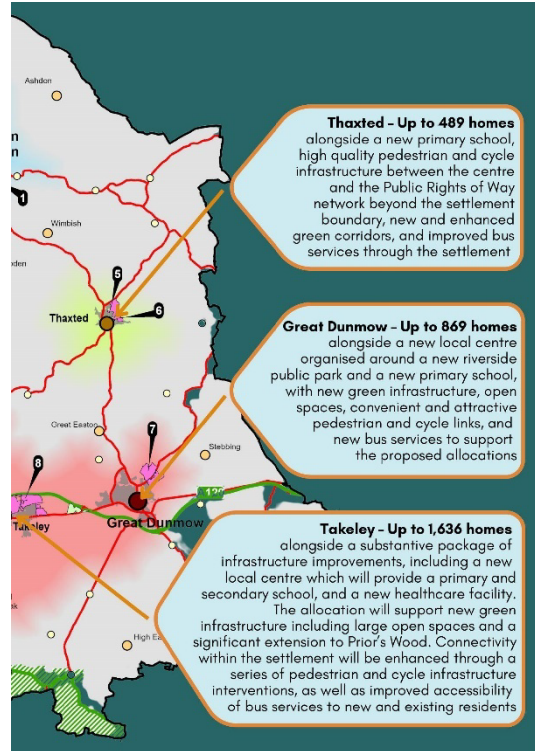


Housing allocations + infrastructure at key sites

Saffron Walden - Up to 1,280 homes alongside new school provision, high quality walking and cycling links and other transport improvements including improved bus frequencies, comprehensive packages of infrastructure enhancements towards new healthcare, open space and leisure facilities, in addition to new and enhanced green infrastructure

Newport - Up to 412 homes alongside expanded primary and secondary school provision, improved footway and crossing infrastructure at Wicken Road, new green infrastructure and open spaces, and enhanced pedestrian connectivity between the settlement and the wider Public Rights of Way Network

Stansted Mountfitchet - Up to 390 homes alongside an additional community use such as a health or leisure facility, a new two-form entry primary school and contributions toward the expansion of local secondary school provision, substantive green open spaces and new pedestrian connections to the existing Public Rights of Way network, as well as enhanced pedestrian and cycle connectivity between the allocations and the town centre along Cambridge Road



Other proposed allocations

Non-strategic development within the larger villages (as shown in the table) will make a meaningful contribution towards the overall housing requirement.

It is important that the scale of development remains modest and reflective of these areas.

Parish	Number of homes*
Elder Street (Wimbish)	115
Henham	112
Clavering	111
Hatfield Broad Oak	111
Great Easton	110
Stebbing	109
High Easter	104
Felsted	95
Debden	92
Ashdon	41

*figures correct at the point of printing, for the latest information visit [www.Uttlesford.gov.uk/new-local-plan](http://www Uttlesford.gov.uk/new-local-plan)

We will continue to support communities that wish to engage in neighbourhood planning.

The larger villages in the district will have the opportunity to plan, if they wish to, for the development identified in the table above.

In areas where no neighbourhood plan is proposed to come forward we will plan for the development identified in the table above, in consultation with the parish.



Addressing the climate emergency and protecting the environment



Uttlesford District Council declared a climate emergency in 2019 and pledged to take local action with the aim of achieving net-zero carbon status by 2030 and protecting and enhancing biodiversity in the district.

The local plan is seeking to contribute to this ambition by:

- Reducing the need to travel for local services and facilities, particularly by private car, by ensuring that new developments are in the most sustainable and better served locations.
- Ensuring new developments are required to minimise the use of energy and achieve a high standard of energy and water efficiency which will make homes warmer and the cost of living in the new home cheaper.
- Applying an approach that prioritises green and blue infrastructure from the outset of new developments, achieving biodiversity net gain and the protection and enhancement of environments, including through new planting, connecting natural areas and creating natural sustainable urban drainage systems, where possible.



Building healthy and sustainable communities

The new draft local plan strives to achieve healthy and sustainable communities.

In practice, this means ensuring existing and future residents are served by the homes and facilities which promote healthy choices and social cohesion.

The design of new places can substantially contribute to this goal by delivering the necessary services and facilities.

There are several policies in the plan which ensure the foundations for healthy and successful communities are required of all new developments.

This will set the standard for the appropriate mix of housing – such as addressing affordability issues, specialist needs, number of bedrooms, and custom or self-build housing.

The plan also sets out design criteria against which the appearance and functionality of new development is assessed. This includes policies which protect and support the conservation of the district's landscape and historic environment, which are key to providing a sense of place.

At the same time, the plan seeks to ensure that future development preserves and enhances the experience of existing communities.

Providing a range of new facilities and infrastructure, whilst ensuring these are well integrated and accessible to current residents, will mean the vitality and sustainability of existing communities can be supported.

The proposals and policies within the plan therefore seek to address local needs and challenges, providing fit for purpose solutions that make Uttlesford an attractive and distinctive place to live, work and visit



How to view the consultation documents

Copies of the Draft Uttlesford Local Plan, the evidence base and background studies used in preparing the plan can be found on the council's website:

www.uttlesford.gov.uk/new-local-plan

Paper copies of the draft local plan document are available to view at local libraries and at Uttlesford District Council's offices in Saffron Walden.

Information point

An information point will be in place until 18 December. This will provide an overview of the proposals and details of how to respond to the consultation.

The information point is available during normal opening hours at:

Uttlesford District Council Offices
London Road
Saffron Walden
CB11 4ER



How to submit your views

There are a number of different ways to send in your comments:

• Online

Visit www.uttlesford.gov.uk/new-local-plan

This is the most convenient way of submitting comments and ensures you will be kept informed of future stages of plan preparation.

• Via email

Responses should be sent to localplaneuttlesford.gov.uk

A comments form is available to download from the website.

• Via post

A paper copy of the comments form can be used, which is available on the website, at the District Council offices and local libraries.

Written responses should be posted to: *Local Plan Team, Uttlesford District Council, London Road, Saffron Walden, CB11 4ER*

All consultation responses must be received by
5pm on 18 December

It is a requirement of the local plan process that comments can only be accepted if they are received in writing (online, email or post). Comments made verbally or anonymously cannot be accepted.

The council is obliged to make all representations available for public inspection on its website.

