



Report to Uttlesford District Council

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Inspectors appointed by the Secretary of State

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Planning and Compulsory Purchase Act 2004 (as amended)

Section 20

Report on the Examination of the Uttlesford Local Plan 2021-2041

The Plan was submitted for examination on 18 December 2024

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Abbreviations used in this report

BNG	Biodiversity Net Gain
Council	Uttlesford District Council
DPD	Development Plan Document
DtC	Duty to Cooperate
EUI	Energy Use Intensity
Framework	National Planning Policy Framework, December 2023 (unless stated otherwise)
FHS	Future Homes Standard
GTAA	Gypsy and Traveller Accommodation Assessment
HELAA	Housing Economic Land Availability Assessment
HRA	Habitats Regulations Assessment
l/p/d	litres per person per day
MM	Main Modification
RAMS	Recreational Disturbance Avoidance and Mitigation Strategy
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SAMM	Strategic Access Management Measures
SANG	Suitable Alternative Natural Greenspace
SCI	Statement of Community Involvement
SEA	Strategic Environmental Assessment
SHD	Space Heating Demand
SPA	Special Protection Area
SPD	Supplementary Planning Document
TER	Target Emissions Rate
SuDS	Sustainable Drainage Systems
WMS	Written Ministerial Statement
2004 Act	Planning and Compulsory Purchase Act 2004
2012 Regulations	Town and Country Planning (Local Planning) (England) Regulations 2012

This report references various documents presented to the examination and where necessary we have cited the relevant core document reference in brackets, for example (ULP1).

Non-Technical Summary

This report concludes that the Uttlesford Local Plan 2021-2041 provides an appropriate basis for the planning of the District of Uttlesford, provided that a number of main modifications (MMs) are made to it. Uttlesford District Council (the Council) has specifically requested that we recommend any MMs necessary to enable the Plan to be adopted.

Following the hearing, the Council prepared schedules of the proposed modifications and carried out sustainability appraisal (SA) and habitats regulations assessment (HRA) of them. The MMs were subject to public consultation over a six-week period. In some cases, we have amended detailed wording of the MMs, and/or added consequential modifications where necessary. We have recommended their inclusion in the Plan after considering the SA and HRA, and all the representations made in response to consultation on them.

The main modifications can be summarised as follows:

- Adding new Core Policy 2a requiring a Local Plan review in the event of there being an inadequate housing supply 6 months after adoption
- Amending Core Policy 6a to ensure delivery of the housing requirement at Newport if not brought forward in a neighbourhood plan
- Deleting Core Policy 8 safeguarding land for a future section of link road south of Saffron Walden
- Simplifying Core Policy 11 on London Stansted Airport to use a single designation based on the airport's operational area
- Deleting Core Policy 18 safeguarding land for expansion of Forest Hall Secondary School at Stansted Mountfitchet
- Clarifying the position on constraints and development potential at Thaxted
- Adding new Core Policy 32a about aerodrome safeguarding
- Changing Core Policy 38 to clarify when Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management Measures (SAMM) apply to development within the Essex Coast and Hatfield Forest zones of influence
- Modifying requirements for wheelchair accessible housing to accord with the evidence base
- Adding flexibility to Core Policy 40 where biodiversity net gain would impact viability
- Adding a housing trajectory
- A number of other modifications to ensure that the Plan is positively prepared, justified, effective and consistent with national policy.

Introduction

1. This report contains our assessment of the Uttlesford Local Plan 2021-2041 in terms of Section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended) (the 2004 Act). It considers first whether the Plan is compliant with relevant legal requirements, including the duty to co-operate, and second whether it is sound. To be sound, the National Planning Policy Framework (the Framework) says that the Plan should be positively prepared, justified, effective and consistent with national policy.
2. In line with the transitional arrangements in paragraphs 234 to 236 of the December 2024 Framework, the Plan has been examined under the December 2023 version of the Framework. The same applies to the Planning Practice Guidance. Unless stated otherwise, references to the Framework in this report are to the version published on 20 December 2023 and the version of the Planning Practice Guidance that was extant at that time.
3. The starting point for the examination is the assumption that the Council has submitted what it considers to be a legally compliant and sound plan. The Uttlesford Local Plan 2021-2041 submitted in December 2024 is the basis for our examination. It is the same document published for consultation in August 2024.

Main Modifications

4. In accordance with section 20(7C) of the 2004 Act, the Council requested that we should recommend any MMs necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. Our report explains why the recommended MMs are necessary. The MMs are referenced in bold in this report in the form **MM1**, **MM2** and so on, and are set out in full in the Appendix.
5. Following the examination hearing, the Council prepared a schedule of proposed MMs and carried out SA and HRA of them where necessary. The MM schedule was subject to public consultation for 6 weeks.
6. We have taken account of the consultation responses on the MMs in coming to our conclusions in this report and in this light we have made some amendments to the detailed wording of the MMs and added consequential modifications where these are necessary for consistency or clarity. None of the amendments significantly alter the content of the modifications as published for consultation or undermines the participatory processes and SA/HRA that have been undertaken. Where necessary we have referred to these amendments in the report.

Policies Map

7. The Council must maintain an adopted Policies Map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission Policies Map, showing the changes to the adopted Policies Map that would result from the proposals in the submitted Local Plan. In this case, the submission Policies Map comprises the set of plans identified as Uttlesford Draft Local Plan 2021-2041 Policies Map (ULP 4).
8. The Policies Map is not defined in statute as a development plan document and so we do not have the power to recommend MMs to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the Policies Map. In addition, there are some instances where the geographic illustration of policies on the submission policies map is not justified and changes to the policies map are needed to ensure that it is consistent with the MMs.
9. These further changes to the Policies Map were published for consultation alongside the MMs in the Schedule of Proposed Policies Map Modifications to the Submission Plan.
10. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted Policies Map to include all the changes proposed in the Schedule of Proposed Policies Map Modifications to the Submission Plan.

Context of the Plan

11. The Plan relates to the District of Uttlesford, which is located in the northwest part of Essex, bordering Hertfordshire and Cambridgeshire. Uttlesford District Council operates in a two-tier local authority area, along with Essex County Council.
12. Uttlesford District covers approximately 250 square miles, with a population of around 91,300 in 2021. About two fifths of Uttlesford's population live in the settlements of Saffron Walden, Great Dunmow and Stansted Mountfitchet. The remaining population live in the surrounding rural area, which includes the local rural centres of Elsenham, Great Chesterford, Hatfield Heath, Newport, Takeley/Priors Green and Thaxted, and numerous villages and hamlets of varying size. While Uttlesford is a relatively affluent area, around a fifth of children in the District live in low-income families.
13. London Stansted Airport and Chesterford Research Park are large economic drivers in the District. The M11 motorway runs north to south through the

western part of the District, connecting Cambridge and London. The A120 trunk road crosses the southern part of the District from east to west, connecting to Braintree, Colchester and the Port of Harwich to the east, and London Stansted Airport, Bishop's Stortford and the M11 to the west. The West Anglia main line also runs through Uttlesford.

14. The District has a rich collection of heritage assets. Among these are a number of medieval buildings, and the Jacobean Audley End with registered Park and Garden. There are a range of important sites for biodiversity with national and local designations including Hatfield Forest which is a rare surviving example of a royal hunting forest. Part of the District is located on a low ridge of chalk hills that runs from the south-west to the north-east through rolling countryside, with rare and distinctive chalk stream habitats.
15. A climate and ecological emergency was declared by Uttlesford District Council in 2019. This commits the Council to achieving net zero in its operations by 2030. In 2021, the Essex Climate Action Commission set out more stretching carbon and greenhouse gas reduction targets than those adopted by the Government, to lead and quicken the pace to carbon emission reduction in the County.
16. The Plan will replace the current Uttlesford Local Plan 2005. It will form part of the development plan for the District, together with development plan documents (DPDs) on minerals and waste prepared by Essex County Council, made neighbourhood plans, and the Gypsy and Traveller DPD once it is adopted.

Public Sector Equality Duty

17. Throughout the examination of the Plan we have had due regard to the aims expressed in Section 149 of the Equality Act 2010. This sets out, among other things, the need to advance equality of opportunity and to foster good relations between people who share a protected characteristic and those who do not.
18. The Council has integrated an Equality Impact Assessment within their SA Report for the Plan (SA1). The Plan includes specific policies for accessible and adaptable dwellings, a supply of accommodation for gypsies and travellers, and sustainable design policies. These policies benefit people with protected characteristics.
19. Subject to the recommended MMs on these and other policies, we are content that the advancement of equality of opportunity and positive impacts for protected groups has been appropriately considered and incorporated in the Plan.

Assessment of Duty to Co-operate

20. Section 20(5)(c) of the 2004 Act requires that we consider whether the Council has complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
21. The Duty to Co-Operate (DtC) Topic Paper and Addendum (OTH1 and OTH2), and the Council's Legal Compliance Hearing Statement (WS1/1) identify strategic planning issues relevant to Uttlesford that have been the subject of engagement with neighbouring authorities and prescribed bodies. These include provision of housing and economic development, gypsy and traveller accommodation, London Stansted Airport, highways and transport infrastructure, education and healthcare provision, climate change mitigation and adaptation, flood risk and drainage, water supply, air quality, Hatfield Forest and Essex Coast zones of influence, biodiversity, green and blue infrastructure, minerals and waste planning, and the historic environment.
22. These documents, together with various statements of common ground and correspondence with neighbouring authorities and prescribed bodies show a constructive, active and ongoing process of engagement has been followed. They demonstrate a pattern of joint working to consider the strategic planning issues relevant to the Plan. They demonstrate that arrangements are in place for effective joint working with adjoining authorities, and county-wide officer engagement on issues including climate change and transport. The Council has also worked collaboratively with infrastructure providers to inform infrastructure planning for the District. We are therefore satisfied that the duty to co-operate has been met.

Assessment of other aspects of Legal Compliance

Local Development Scheme

23. Section 19(1) of the 2004 Act requires development plan documents to be prepared in accordance with the Local Development Scheme. The Local Plan preparation commenced in 2020 with consultation on an Issues and Options paper between November 2020 and April 2021, consultation under Regulation 18 on a draft plan between October and December 2023, and consultation under Regulation 19 on the publication draft plan between August and October 2024. Submission for examination took place in December 2024. Having regard to these regulatory stages being met, we are satisfied that the Plan has been prepared in accordance with the Council's Local Development Scheme.

Consultation

24. Development plans must be prepared in accordance with the statutory requirements for consultation, which are set out in the 2004 Act and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) (the 2012 Regulations).
25. The Uttlesford Local Plan Consultation Report (ULP8) demonstrates how consultation was undertaken during the various stages of Plan preparation, in compliance with the Statement of Community Involvement (SCI). The representations received during the consultation helped inform our identification of the main soundness issues and questions for the hearing.
26. At the Issues and Options and Regulation 18 stage consultation methods included public meetings, exhibitions and social media posts. The Regulation 19 consultation on the publication version of the Plan was extended to 9 weeks to take account of the summer holiday period, and included newsletters, press releases and adverts in local newspapers, social media posts, DtC engagement with key stakeholders, a Local Plan Panel cross-party working group of the Council's Cabinet, parish events, and drop-in events at Great Dunmow, Saffron Walden, Takeley and Ugly.
27. We conclude that consultation on the Plan was carried out in compliance with the Council's adopted SCI and met the consultation requirements of the 2012 Regulations.

Sustainability Appraisal

28. The Council carried out a sustainability appraisal (SA) of the Plan, prepared a report of the findings of the appraisal (SA1), and published this report along with the Plan and other submission documents under Regulation 19. A subsequent addendum to the SA was published, which assessed the implications of the MMs on sustainability objectives.
29. We consider that the SA report considered an appropriate range of alternative options. The Plan's proposals reflect the overall best performing option identified in the SA report. The extent and level of detail of evidence was proportionate for this high-level assessment of likely significant effects.
30. The Strategic Environmental Assessment (SEA) sets out various key cumulative considerations in terms of reasonably foreseeable effects of the Plan in combination with other plans, programmes and projects.
31. Having regard to this evidence, we are satisfied that the Plan is informed by suitably robust SA and SEA.

Habitats Regulation Assessment

32. In line with the Conservation of Habitats and Species Regulations 2017 (as amended) (the Habitats Regulations), a Habitats Regulation Assessment (HRA) (ENV1) accompanies the Plan. Also, HRA of the proposed MMs was published as part of the MMs consultation.
33. The HRA identified 9 relevant European sites, including Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar Sites that could potentially be affected by the Plan.
34. Of these European sites, 2 Essex coastal sites were not screened out and so were subject to appropriate assessment within the HRA. These are the Blackwater Estuary (Mid Essex Coast Phase 4) SPA and Ramsar, and the Essex Estuaries SAC. The HRA found that adherence to the Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) Supplementary Planning Document (SPD) would be sufficient to prevent adverse effects on these habitats sites. The HRA also concludes that the measures included in the Plan, together with the requirements of the Drainage and Wastewater Management Plans planning process, are sufficient to prevent adverse water effects on these habitats sites.
35. A recent judgement¹ has ruled that Ramsar sites are not subject to the Habitats Regulations although for the purposes of this Plan that does not materially change the HRA as the Blackwater Estuary and Lee Valley Ramsar sites are also designated as SPAs.
36. Natural England agree that the Plan will not have adverse effects on the Essex Coast habitats sites, subject to the Essex Coast RAMS mitigation tariff being secured as part of planning consent for all net new residential development within the zone of influence. This is covered by Core Policy 38, which includes a requirement for mitigative contributions from development in accordance with the RAMS SPD. Overall, the HRA concludes no adverse effects on European sites as a result of the Plan. The addendum to the HRA also concludes that the proposed MMs would not change the findings of the HRA.
37. We conclude that the potential likely significant effects of proposals in the Plan have been appropriately considered through HRA, and that the Plan is legally compliant with respect to the Habitats Regulations.

Other Legal Requirements

¹ CG Fry & Son Ltd v SSLUHC & Somerset Council [2025] UKSC 35

38. Sections 19(1B) and 19(1C) of the 2004 Act require development plans, taken as a whole, to include policies to address the strategic priorities for the development and use of land in the plan area. The Plan sets out 12 strategic objectives to assist the delivery of the Plan's vision. The objectives centre on environmental, economic and community themes.
39. The strategic (core) policies of the Plan provide the strategic policy framework for the District to deliver sustainable development. The strategic policies ensure new housing and employment growth are accompanied by supporting infrastructure and environmental protections. As a result, the Plan meets the statutory requirement set out in the 2012 Regulations.
40. Section 19(1A) of the 2004 Act requires that development plan documents must, taken as a whole, include policies designed to ensure that the development and use of land in the Council's area contribute to the mitigation of, and adaptation to, climate change. Core Policies 1 and 22 to 25 achieve this by including requirements that reduce carbon emissions as well as making new development more resilient to the effects of climate change. Other policies relating to transport, managing waste and responding to flood risk contribute to those objectives.
41. We conclude that the Plan taken as a whole includes policies designed to ensure that the development and use of land in Uttlesford contributes to the mitigation of, and adaptation to climate change.

Conclusion on Legal Compliance

42. The Plan complies with all other relevant legal requirements, including the 2004 Act and the 2012 Regulations.

Assessment of Soundness

Main Issues

43. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, we have identified 11 main issues upon which the soundness of this Plan depends. This report deals with these main issues. It does not respond to every point or issue raised by representors. Nor does it refer to every policy, policy criterion or allocation in the Plan.

Issue 1 – Are the Vision, Objectives and Spatial Strategy positively prepared, justified and effective and will they enable the delivery of

sustainable development in accordance with national planning policy?

Vision, Objectives and Spatial Strategy

44. The spatial vision for Uttlesford is expressed in 12 environmental, economic and social objectives that in broad terms seek to minimise the environmental impact of development, recognise and support economic opportunities in the District, and provide adequate and timely infrastructure to support development. These objectives are consistent with those set out in the Framework for achieving sustainable development.
45. The Plan objectives are to be delivered through the Plan's spatial strategy, which identifies the amount and location of new housing and employment land necessary to meet demand, together with the facilities and infrastructure needed to support that development. The strategy is underpinned by Core Policies 1-5 that set overarching themes for new development in relation to climate change, housing need, settlement hierarchy, business and employment needs, and infrastructure and services. In spatial terms the strategy is divided into 4 areas, which take account of the local distinctiveness of those areas and their individual needs. Finally, the Plan includes a range of District-wide policies that address the overarching themes and other objectives of the Plan in more detail, including protection of the environment.
46. The Plan contains a key diagram that shows the main features of the Plan, including site allocations, the settlement hierarchy and key transport routes. For effectiveness **MM1** updates the key diagram to reflect boundary changes to some of the allocations resulting from other modifications to the Plan.

Core Policy 1: Addressing Climate Change

47. Core Policy 1 sets out criteria by which new development must demonstrate how it will mitigate, adapt and be resilient to the impacts of climate change and support a reduction in greenhouse gas emissions. The policy, together with other policies cross referenced in Core Policy 1, address the requirement to take a proactive approach to mitigating and adapting to climate change and for that reason is consistent with national planning policy.

Core Policy 2: Meeting our Housing Needs

48. Core Policy 2 sets a housing requirement of 13,500 over the plan period April 2021 to March 2041. That requirement is calculated using the standard method set out in the Planning Practice Guidance consistent with the December 2023

version of the Framework against which this Plan is being examined. It is therefore justified and consistent with national policy.

49. The Plan identifies a total housing land supply from all sources of 15,211 dwellings over the same period. The housing land supply contains a windfall allowance. Having heard a range of views during the examination, we are content that there is compelling evidence in the Housing and Economic Land Availability Assessment (HELAA) (HOU2) to justify the inclusion of a windfall allowance in the housing land supply, and that the figure is justified based on past performance. We understand that windfall supply may to some extent be inflated by the past lack of an up-to-date Plan, but the cautious nature of the figure included for windfalls in the housing calculations is in our view sufficient to cater for any uncertainty arising from that situation.
50. The requirement for at least 10% of sites being of 1 hectare or less would be met from completions and commitments.
51. The housing land supply meets the housing requirement, with headroom of approximately 12.6%. We are satisfied that it is sufficient to make housing supply robust over the plan period notwithstanding some uncertainty over forecasts for individual site allocations. The housing supply figures changed during the course of the examination because more up-to-date information from the latest annual monitoring data became available. Consequently **MM2** is necessary to update Table 4.2 in the Plan for effectiveness.
52. The Council is unable to demonstrate that there will be a five-year housing land supply on adoption of the Plan. That is in part because of the need to add a 20% buffer to the housing requirement calculations due to past under performance as measured by the housing delivery test. While the data already submitted by the Council to the Government indicates that the next housing delivery test for Uttlesford may well require only a 5% buffer, that data and the method of calculation have yet to be verified. Paragraph 80 of the Framework is clear that until new housing delivery test results are published, the previously published result should be used. We therefore base our judgement on the current (2023) requirement for a buffer of 20%, which results in 4.77 years' worth of housing land supply.
53. Having reached this conclusion, we have considered carefully what the consequence of such a finding is on the soundness of the Plan. The Planning Practice Guidance advises that, wherever possible, Inspectors should recommend main modifications to the Plan to ensure that it identifies a five-year housing land supply from its date of adoption. However, as we set out in our post-hearing note (ID5), there is a downside to such an approach. The examination would have to be paused, the Council may have to carry out a further call-for-sites and then would have to select sites using an updated

sustainability appraisal, which would have to be tested at a further hearing. That process would introduce considerable delay in progressing the Plan towards adoption and the delivery of the sizeable housing allocations contained in it.

54. We are also conscious that while less than 5 years, the deliverable housing supply is still substantial at 4.77 years' worth. Furthermore, the rate of housing delivery in Uttlesford in recent years has been significant and is forecast to continue, such that the Council is unlikely to have to include an increased buffer to account for undersupply in forthcoming years. While we are unable to take account of the likelihood of the buffer in housing land supply calculations changing because of the position set out in the Framework, based on the calculations in the 5 year housing supply update (UTT5) it is possible that the Council will be able to show a five-year housing supply on or shortly after the expected adoption date.
55. Having regard to both those factors, we conclude that to delay adoption of the Plan for the significant amount of time that would be needed would be counter-productive in having an up-to-date plan that would significantly boost the supply of homes and other much needed development, in a District that has not had such a strategy for some 20 years. In our view, the advantages of expediting the adoption of the Plan outweigh the disadvantages of it not being able to demonstrate a five-year housing land supply.
56. That having been said, clearly there is a need for the Council to address the five-year housing land shortfall as soon as possible. Therefore, we consider it necessary to include a policy requiring an early review of the Plan unless, within a period of 6 months from the date of adoption, it can be demonstrated that such a housing land supply has been achieved. **MM3** inserts Core Policy 2a in the Plan for effectiveness. Following the MM consultation, we have amended the supporting text in **MM3** to more accurately reflect the new policy.

Core Policy 3: Settlement Hierarchy

57. The Plan uses a settlement hierarchy to aid in distributing new development across the District. Core Policy 3 divides the hierarchy into four tiers based on population size, range of facilities and services, their characteristics, accessibility, employment opportunities and the functional relationship with their surrounding areas. Our view is that the settlement hierarchy approach, taken in combination with the site allocations, is an appropriate means of distributing housing development in the District over the plan period. It would in broad terms deliver housing in proportion to existing settlements, in a manner that maximises accessibility to existing facilities and services while ensuring a degree of dispersal that supports the delivery of housing throughout the District.

58. We acknowledge that there are different ways to approach a settlement hierarchy, including extending it to smaller settlements or introducing a greater range of settlement categories. There are also choices to be made on matters of detail in the criteria used to assign settlements to the different tiers in the hierarchy, recognising that these may change over the course of the Plan and indeed the examination. However, when taken together, these are largely matters of judgement and we see nothing inherently wrong in the choices made by the Council, including the use of settlements rather than parishes as the basis for distributing housing in the rural area. We consider the general approach and the division of settlements in the hierarchy to be sound.
59. Having considered various options, the SA Report found little strategic argument for giving further detailed consideration to a new settlement option at the current time. We agree with that finding. While a new settlement can potentially help deliver large-scale housing and employment schemes, as indicated by the withdrawal of previous draft plans for the District, this type of approach is complex and can risk delay in boosting the provision of housing in the short term.
60. That does not mean that a new settlement is ruled out forever. While DtC engagement with other local planning authorities indicates that no formal requests have been made for the District to contribute to meeting wider unmet housing or other needs to date, the Council is open to exploring alternative approaches to accommodating development in the future, potentially within the context of a County spatial plan. That would be a matter for future iterations of the local plan.
61. There is also the question of whether delivering non-strategic housing through neighbourhood plans is a justified and effective method for housing delivery. Having heard from some of the neighbourhood groups, and the advance work that those groups and the Council have done in anticipation of the approach being adopted in the Plan, we are satisfied that it is likely to be effective in this case. If non-strategic sites do not come forward within a two-year period from adoption, the Plan contains a mechanism, including as recommended in **MM5** for Newport, for the Council to step in and allocate land either through a local plan review or a development plan document.

Core Policy 4: Meeting Business and Employment Needs

62. The District has a relatively small working population and a greater proportion of small businesses when compared to neighbouring districts. That reflects its rural character, and comparatively strong commuter flows to neighbouring towns for work. Business and employment needs are skewed by London Stansted Airport, which is a major employer in the region, and to a lesser extent Chesterford

Research Park, which is well placed to respond to demand for high tech business locations in the wider Cambridge sub-region.

63. The Employment Needs Update (EMP1) identifies a residual need for 14.6 hectares of office and research and development land and 31.5 hectares of industrial and storage and warehouse land over the plan period. This need takes account of outstanding commitments for employment floorspace, most notably that at Northside, Stansted, which is considered sufficient to meet London Stansted Airport specific needs as well as some non-airport related demand. Other than for research and development demand arising from Chesterford Research Park, the majority of the remaining demand for employment land arises in the south of the District, in particular for sites easily accessible from the primary highway network of the M11 and the A120.
64. Core Policy 4 seeks to meet business and employment needs in full. In addition to existing permitted employment floorspace, the policy makes provision for 19 hectares of office and research and development land, predominantly at Chesterford Research Park, and 38.5 hectares of general industrial, storage and distribution land, predominantly in the south of the District. The allocations include significant headroom which would ensure employment needs are met over the plan period and be flexible enough to provide for needs not anticipated in the Plan. Given the inherent uncertainty in forecasting employment needs, we consider that approach to be justified.

Core Policy 5: Providing supporting Infrastructure and Services

65. The approach to providing supporting infrastructure and services is set out in Core Policy 5. This has regard to the Infrastructure Delivery Plan and site development templates that identify the infrastructure needed to support the development in the Plan. Funding for infrastructure would be by a combination of a community infrastructure levy, which is being progressed towards adoption, and legal agreements under Section 106 of the Town and Country Planning Act 1990. We consider that overall approach to be sound.

Conclusion on Issue 1

66. Subject to the MMs set out above, we conclude that the vision, objectives and spatial strategy of the Plan are positively prepared, justified and effective, and will enable the delivery of sustainable development in accordance with national planning policy.

Issue 2 - Is the approach to development in the North Uttlesford Area Strategy positively prepared, justified, effective and consistent with national policy?

67. The North Uttlesford Area Strategy centres on the area in the vicinity of the north-south M11 and rail corridor that runs between the local rural centres of Great Chesterford and Newport. To the east of these transport corridors the area also includes Saffron Walden, which is the largest key settlement in Uttlesford, and Chesterford Research Park, which is part of a regional biotech employment cluster.

Housing and Employment

68. Core Policy 6 allocates a strategic mixed-use allocation of around 879 dwellings and 2.5 hectares of employment land on the south eastern edge of Saffron Walden. It also allocates just over 13 hectares of employment land at Chesterford Research Park. We consider these allocations to be sound and proportionate to the demand for housing and employment in the northern part of the District.
69. The County Council as the education authority has decided that rather than seek expansion of the existing secondary school in Saffron Walden, its approach will be to manage demand for secondary school places as part of the wider North Secondary School Planning Group. Expansion of one or more schools will only be considered if it is shown that such options are necessary to meet local demand and align with strategies to deliver wider school place planning objectives. This will provide flexibility for local secondary education planning taking account of various drivers, including new development and changing birth rates. Having regard to that approach, we are satisfied that the demand on secondary education places arising from the housing allocation has been adequately considered.
70. In terms of traffic-related air quality impacts of Local Plan development at Saffron Walden, a range of sustainable transport options for residents will be available to accompany the new strategic development allocations. These will build on the town's recent track record of addressing air quality issues. The Saffron Walden Air Quality Modelling Assessment (ENV1) indicates that traffic arising from planned development, including in the vicinity of Radwinter Road, is expected not to significantly reduce local air quality. For the above reasons, we conclude that Core Policy 6 is justified, effective and sound, and does not require main modification.
71. The boundary of the Chesterford Research Park allocation in Figure 5.1 (North Uttlesford Area Strategy Map) needs to be amended for consistency with the site development template. **MM4** makes the necessary amendment for

effectiveness. We have corrected **MM4** to read 13.5Ha of Land at Chesterford Research Park for accuracy, so that the text in the Area Strategy Map and Table 5.2 match. **MM50** clarifies the extent of the protective buffer between development at Chesterford Research Park and the Ancient Woodland and Local Wildlife Site at Emmanuel Wood in the site development template, for effectiveness.

72. The residual housing requirement figure in Core Policy 6a for Newport is 300 dwellings. We are satisfied that this number is justified for this local rural centre, for the reasons set out in the Larger Villages and Newport Housing Requirement Topic Paper (HOU5).
73. Core Policy 6a places a limit of 99 dwellings for non-strategic site allocations for housing in Newport. Some uncertainty remains about the capacity of the local highway network to safely accommodate larger scale development at Newport, particularly around the junction of High Street and Wicken Road.
74. We note there are some community and developer aspirations for larger strategic scale development in Newport, in part because of the limited number of smaller (non-strategic) sites. However, the HELAA (HOU2) suggests that Newport has capacity to meet most of its planned housing requirement from sites with capacities of less than 100 units. Also, the neighbourhood plan process provides scope to accommodate additional small sites not included within the HELAA.
75. Taking these factors together we consider that the non-strategic scale of housing allocation would still enable delivery of Newport's overall housing requirement of 300 dwellings. We conclude that it is not necessary to change the Plan's approach to housing allocation at Newport from non-strategic to strategic scale.
76. In the event that a neighbourhood plan including the necessary scale of development was not 'made' within two years of adoption of the Plan, it is necessary that an alternative mechanism is available to ensure that development comes forward. Such a mechanism would be consistent with the approach in the Plan to non-strategic housing allocations at other settlements. **MM5** makes the required modification for effectiveness.

Transport and Highways

77. We recognise that traffic volumes will increase in the area, including around the allocations at Saffron Walden, and Great Chesterford Research Park. However, at Saffron Walden the mixed-use strategic allocations are located within a short bus ride of the town centre. Also, the new link road through the allocations at Saffron Walden will provide multi-modal access through this development.

Together with the traffic management interventions set out in the Council's Infrastructure Delivery Plan (INF10) we consider this will provide a suitable range of sustainable transport options for both new and existing residents in Saffron Walden.

78. For Chesterford Research Park, the evidence presented to the examination identifies the development and enhancement of strategic routes from Great Chesterford railway station and from Saffron Walden. These include improved connections to the wider walking and cycling network, including new strategic cycle routes and improvement of bus services to the site. Even though the site is somewhat isolated, we are satisfied these measures will deliver sustainable transport proposals, consistent with national planning policy.
79. Transport modelling suggests there may be some modest impact on Junction 9a of the M11 in terms of increased queuing on one off-slip, although this can be mitigated. We are satisfied that the modest increase in additional traffic from the Research Park would not result in a severe adverse effect on M11 Junction 9a and is therefore consistent with national transport policy.
80. Together with the core policies in the transport chapter, the North Uttlesford Area Strategy makes appropriate policy provision to mitigate increased traffic levels arising from development in the plan period. Therefore, modification of the North Uttlesford Area Strategy is not necessary for soundness in terms of transport and access.
81. Core Policy 8 seeks to safeguard land south of Saffron Walden for a future section of link road between Thaxted Road and Newport Road. However, the road is not required to deliver any of the strategic site allocations in the Plan. Neither is there any evidence that the land in question is under threat of development for other purposes. Also, no transport modelling has been undertaken to demonstrate what effect such a link road would have on the wider highway network, nor how it would be funded. Given this combination of factors, safeguarding this land in the Plan is not justified. **MM7** makes the necessary modification by deleting Core Policy 8, and **MM62** deletes from Appendix 8 the corresponding map of the proposed safeguarded land referred to in Core Policy 8.
82. For effectiveness, **MM48** clarifies that for the strategic allocations at Saffron Walden, the specification for the stretches of spine road South and North of Thaxted Road should match.

Green and Blue Infrastructure

83. The North Uttlesford Area has a below average level of access to semi-natural and public green space. To address this deficit, Site Development Template

Framework 2A for Saffron Walden includes more than 20 hectares of open space and green infrastructure, which exceeds the minimum open space standards set out in Appendix 17 of the Plan. This green infrastructure includes provision of a multi-functional open space for formal sports use, as well as other public open space. The provision of this open space, together with other policies in the Plan that relate to the protection of water resources, will help limit the impact of a growing population on the sensitive chalk stream habitats found in the North Uttlesford Area.

84. We conclude that the North Uttlesford Area Strategy makes appropriate provision for green and blue infrastructure, and no modification of Core Policies 6 and 9 is necessary for soundness on this matter.

Conclusion on Issue 2

85. We conclude that, subject to the MMs identified above, the approach to development in the North Uttlesford Area Strategy is positively prepared, justified, effective and consistent with national policy.

Issue 3 – Is the approach to development in the South Uttlesford Area Strategy positively prepared, justified, effective and consistent with national policy?

Housing and Employment

86. The South Uttlesford Area Strategy centres around the east-west corridor formed by the A120 running from Junction 8 of the M11 to Braintree through the southern part of the District. It includes the key settlement of Great Dunmow, the local rural centre of Takeley/Prior's Green, and the eastern side of London Stansted Airport including its transport interchange. The surrounding countryside contains many small villages, together with a National Nature Reserve at Hatfield Forest, the Flitch Way (a walking/cycle path along a former railway line running parallel to the A120) and a Countryside Protection Zone around the airport.
87. Core Policy 10 allocates around 2,424 dwellings in Great Dunmow and Takeley, and 36 hectares of employment land in Little Canfield west of Great Dunmow and land north of Taylors Farm to the west of Takeley. Changes to the detailed boundaries and consistency in naming of some of these allocations requires the strategy map in Figure 6.1 to be updated. **MM6** achieves that modification for effectiveness.

88. There are 2 housing allocations in Great Dunmow comprising land to the east of Church End adjacent to The Broadway and to the west on land between the River Chelmer and the B1008. A range of potential housing sites in Great Dunmow have been assessed in the HELAA, some of which also have merit. However, we see nothing inherently unsound about the way the Council has approached these allocations or their rationale for choosing them ahead of other options. One of the benefits of the selected sites is the accompanying extensive open space that would form country parkland. For clarity and effectiveness, **MM8** updates the indicative framework plan for Great Dunmow to remove an incorrect sports pitch symbol and clarify the position of safeguarded land for a primary school.
89. Traffic associated with the 2 housing allocations is likely to increase the use of Church End Bridge, a cast iron structure spanning the River Chelmer at Church End, which is subject to a weight restriction. During the course of the examination, the Highway Authority and engineers employed to survey the bridge agreed on a method of assessment and, if necessary, measures to allow the weight restriction to be upgraded. We are satisfied that, subject to any strengthening required, the bridge will be able to accommodate additional traffic associated with the allocations, including buses.
90. Part of the allocated site between the River Chelmer and the B1008 lies within flood zones 2 and 3. The Council is satisfied that built development, which would occupy only some 18% of the site area, can be located outside the parts of the site at risk from flooding. **MM53** modifies the site development template in Appendix 3 by making this requirement explicit, for effectiveness and consistency with national policy.
91. A number of heritage assets have been identified whose settings may be affected by the housing allocations in Great Dunmow. St Mary's Church and the Church End Conservation Area are screened from the east and north by wooded grounds such that appreciation of their significance is gained mainly in views from the churchyard and along Church Street. From the eastern side of the valley, some glimpsed views can be obtained but neither the church nor Church End are particularly prominent. Visibility may vary seasonally, but we consider the impact of the allocations on the settings of these heritage assets to be limited.
92. We have reached a similar view on the impact of the allocations on the settings of The Parsonage and scheduled monuments nearby. Their settings are now largely defined by their grounds or immediate surroundings. While some longer distance views may be curtailed by new development, and the assets would be seen in conjunction with new development, that would have only a limited impact on the ability to appreciate them.

93. Our conclusion is that while the proposed development would have some adverse impact on the wider countryside setting of the heritage assets, the harm would be less than substantial, and towards the lower end of that scale. The public benefits of providing significant housing allocations in a planned manner, including extensive open space and other facilities, would outweigh that harm. We reach that view notwithstanding the great weight given to the conservation of heritage assets. Accordingly, we find the Great Dunmow strategic housing allocations to be sound and potential changes detailed in the Council's note on Great Dunmow and update to the Statement of Common Ground with Historic England (UTT10) to be unnecessary.
94. The housing allocation East of Takeley forms a continuation of recent development at Priors Green. The allocation includes a local centre, land for a new secondary school and extensive woodland and open space to the west of Smiths Green. The open space retains the setting of the heritage assets in and around the Warish Hall moated site. This allocation indicates the benefits of plan making where housing is brought forward together with supporting facilities and services. **MM9** updates the indicative framework for Takeley taking account of a recent permission at Bulls Field, for effectiveness.
95. Two employment allocations are proposed on Land between the A120 and Stortford Road B1256 at Little Canfield to the west of Great Dunmow, and land north of Taylors Farm to the west of Takeley. Both sites take advantage of proximity to the A120 and the M11 for access. Their locations respond to forecast employment needs in the southern part of the District. We consider them to be justified and consistent with national policy which seeks to support economic growth and productivity.
96. The Council commissioned an air quality assessment which concludes that while there may be a minor adverse impact on a small part of Hatfield Forest from the traffic that would be generated by the employment allocation on land north of Taylors Farm, that impact would not be significant.
97. It was confirmed at the hearing that while Hatfield Forest is designated as a Site of Special Scientific Interest and National Nature Reserve, it is not designated under the Habitats Regulations. We therefore consider that the correct approach to assessing the ecological impact of the allocation on Hatfield Forest is not the precautionary approach taken in the Habitats Regulations but rather an environmental impact approach where the magnitude of the effect is of relevance in reaching a conclusion on significance.
98. In this case the assessment forecasts that increased pollutants arising from the Local Plan as a whole (including land north of Taylors Farm) could result in slightly increased nitrogen deposition of up to 5% of the critical level, with lesser amounts of ammonia and acid deposition, on up to 5% of the Forest. Due to air

quality being forecast to improve over the coming years, in practice it is likely that the effect of these changes would be to slow the rate of improving air quality rather than cause a net deterioration in the habitats for which Hatfield Forest is noted.

99. This forecast represents a very small magnitude of potential adverse impact on Hatfield Forest, which in our view would not be significant. Having regard to the role that the allocated site would play in helping to meet future employment needs of the District, on land that is otherwise sustainably located, we conclude that the employment site allocation is justified. The change to the area safeguarded for possible access to the A120 in **MM62** does not alter our view on this matter.
100. The adopted Uttlesford Local Plan contains a policy protecting the Takeley Mobile Home Park from redevelopment. The reason for the policy arises from the relocation of the mobile home park when London Stansted Airport was being developed. The Council wish to continue to protect the park but omitted the policy from the submitted Plan. **MM12** is required to insert a new Development Policy 10: The Takeley Mobile Home Park for effectiveness and consistency with the previous policy.

London Stansted Airport

101. London Stansted Airport is a major commercial operation in the District. As the fourth largest airport in the country it provides air routes to national and international destinations as well as supporting a significant air freight operation. The Council acknowledges the benefits of the airport as an economic driver and major employer in the region as well as the challenges that arise from demands on transport, noise and development pressures.
102. Much of the employment need generated by the airport over the plan period has already been met by the approval at Northside, which has permission for 195,000 sqm of predominantly industrial, storage and distribution floorspace. A recent application for an increase in airport capacity from 43 to 51 million passengers per annum has the potential to further increase both employment opportunities and also transport flows. It is currently with the Council for determination.
103. The Council has responded to concerns raised by the airport operator by proposing a number of modifications to the submitted Plan. The first of these is to formalise aerodrome safeguarding through the inclusion of a new Policy 32a: Aerodrome and Military Safeguarding in **MM22**. We agree with this approach as it provides greater clarity and effectiveness. The new policy recognises the need to safeguard aircraft manoeuvres from development which may cause a hazard, for example tall structures within close proximity to an aerodrome or which might increase the risk of bird strike. It uses the safeguarding zones produced

by the Civil Aviation Authority as the geographical expression of the policy. The safeguarding zone shown in Appendix 5 of the Plan is therefore not justified and **MM49** deletes it for effectiveness. **MM60** effectively duplicates the modification introduced by **MM49**. It is therefore unjustified and we have deleted it from the main modification schedule.

104. The need to safeguard aerodromes applies not only to London Stansted Airport but also to Duxford Aerodrome and Carver Barracks Airfield. For justification and effectiveness, **MM10** deletes the reference to aerodrome safeguarding and explanatory text from Core Policy 11: London Stansted Airport and in its place **MM22** inserts new Core Policy 32a: Aerodrome and Military Safeguarding together with explanatory text in the Transport chapter. **MM23** makes consequential changes to Core Policy 33: Managing Waste. All these modifications are required for effectiveness.
105. The second change to Core Policy 11 is to simplify the policy approach to the airport boundary and its relevance to airport-related parking. As submitted Core Policy 11 divides London Stansted Airport into different use zones, with differing policy approaches applying to each. Because the airport benefits from permitted development rights, the application of the policy as drafted would have been confusing and of limited effectiveness. Our preferred alternative approach is to use the operational boundary of the airport, in which permitted development rights apply, as the geographical expression of the policy and to add a paragraph to Core Policy 31: Parking Standards to control off-airport parking in so far as that is practicable. We consider these changes are necessary for justification and effectiveness. **MM10** and **MM21** make the necessary modifications to Core Policies 11 and 31 respectively.
106. **MM10** also modifies Core Policy 11 to support the continued use of the airport in relation to approved airport capacity, rather than as originally submitted a specified capacity in millions of passengers per annum. This change recognises that airport capacity may change over the course of the plan period and is necessary for effectiveness.
107. The purpose of Core Policy 12: Stansted Airport Countryside Protection Zone is to conserve and enhance the rural area around the airport; a purpose which we do not seek to challenge. The ponds south of the airport form part of its water management system. Although the site is open, the ponds are artificial in character and designed as functional infrastructure rather than as complementary features in the landscape. For those reasons we consider that the ponds should not be included in the Countryside Protection Zone. **MM63** is required to amend the Countryside Protection Zone boundary shown in Appendix 9 of the Plan for effectiveness.

Transport

108. Additional development proposed in the Plan will inevitably result in additional traffic, which will add to existing traffic flows and congestion at those junctions which already experience capacity issues at peak periods. However, agreement has now been reached in principle with National Highways on assessments for Junction 8 of the M11, and Essex County Council as the highway authority is not raising any fundamental objections to the Plan. In neither case are additional traffic flows forecast to cause severe congestion, which is the critical test in national planning policy.
109. We acknowledge that some of the concerns expressed by respondents on sustainable transport schemes have merit. The active travel corridor between Takeley and London Stansted Airport, and the use of Flitch Way for increased walking and cycling, are both worthwhile projects that have potential to improve active travel. However, these are as yet at the early stages of planning, and there may be obstacles to their full implementation. Nevertheless, neither of these projects are essential for the delivery of new development. Their implementation, even if not fully realised, together with other sustainable transport initiatives such as the mobility hubs, will help to encourage the use of walking, cycling and bus options for those who are willing and able to do so. In the South Uttlesford Site Development Template, **MM51** clarifies for effectiveness that contributions may be sought for improvement of the Flitch Way from strategic development at Takeley.
110. **MM11** proposed additional text to highlight a proposal in the Uttlesford and Essex Local Cycling and Walking Infrastructure Plan for a shared use cycle/walking facility along the B1256. However, in response to representations on the main modifications schedule, the Council accepts that this scheme is not sufficiently advanced to be able to identify with confidence the land that needs to be safeguarded. We therefore consider that the change proposed in **MM11** is not justified and should be deleted. That does not prevent the Council, Highways Authority and developers from working together to seek to deliver active travel routes along the B1256 where that is achievable.
111. Land is safeguarded in the Plan to enable further feasibility work for gaining direct access to the A120 from the employment site allocation on land north of Taylors Farm. This safeguarding proposal is justified as there are advantages to direct access from the A120 if that can be achieved. The area of land for safeguarding needs to be amended and extended to cater for a range of possible access options. **MM62** alters the map in Appendix 8 for effectiveness.

Conclusion on Issue 3

112. Subject to the MMs set out above, we conclude that the approach to development in the South Uttlesford Area Strategy is positively prepared, justified, effective and consistent with national policy.

Issue 4 – Is the approach to development in the Stansted Mountfitchet and Elsenham Area Strategy positively prepared, justified effective and consistent with national policy?

113. The Stansted Mountfitchet and Elsenham Area Strategy contains the key settlement of Stansted Mountfitchet and the local rural centre of Elsenham lying either side of the M11 motorway. The 2 settlements are surrounded by open countryside, including land lying to the west of London Stansted Airport in the Countryside Protection Zone. The area is intimately linked with London Stansted Airport and Bishop's Stortford for employment opportunities and some higher order retail and leisure facilities. As well as the M11 motorway, both settlements are well served by the West Anglia main railway line, with direct services to London and Cambridge.
114. Core Policy 16 allocates 435 dwellings across 3 sites, 2 on the northern edge of Stansted Mountfitchet and 1 at Elsenham adjacent to recent development off Henham Road. One employment allocation of 5.5 hectares is also proposed at Gaunts End, Elsenham as an expansion of the existing commercial Water Circle Estate. We consider the location of these allocations to be justified and soundly based. **MM13** is required to update changes and naming consistency to some of the site allocation boundaries on the area strategy map in Figure 7.1, for effectiveness.
115. The site allocation Land at Walpole Meadows, Stansted Mountfitchet includes some 8.6 hectares of open space as part of a total site allocation of some 22.6 hectares. The Council's open space update report (INF5) indicates that there are shortfalls in all categories of open space provision in Stansted Mountfitchet, in particular in natural/semi-natural and amenity greenspace. The open space provision would help to address those shortfalls. The site allocation also falls within the zone of influence of Hatfield Forest. The increased population would be likely to place further recreational pressure on the Forest. It is reasonable that the allocation therefore provides mitigation as alternative green space for that potential negative impact. Lastly the inclusion of the open space as part of the site when it was being promoted was a factor that influenced the decision to allocate the land for development. To alter it now would undermine one of the public benefits of including the site as part of the Plan. The responsibility for future maintenance is a matter for negotiation between the Council and developer. We conclude that in this case the requirement for the open space is justified and no further modification to the Plan is required.
116. A number of detailed amendments were discussed during the examination, some of which we consider are necessary for clarity and effectiveness. **MM55**, **MM56** and **MM57** make changes to the site development template for the allocations at Walpole Meadows to improve the attractiveness of High Lane for active travel, restrict access from Pennington Lane for landscape reasons, and

identify requirements for the open space provision to provide suitable alternative green space. A minor typo correction has been made to the wording of **MM56** as consulted upon to read 'Pennington Lane' for clarity.

117. The site allocation at Elsenham includes land to expand a safeguarded site in the consented scheme for primary educational purposes. The intention is to use the expanded site for primary, early years and childcare provision. **MM58** clarifies the size and proposed use of the expanded site in the Site Development Template for effectiveness.
118. Core Policy 18 proposes to safeguard an area of land adjacent to Forest Hall Secondary School to prevent other development precluding the potential for its future expansion. If modified as suggested as shown in the Statement of Common Ground with Essex County Council (UTT3 A), the area of land would lie to the west of the existing school
119. Built educational development upon the land would be in conflict with the existing Green Belt designation. It is possible that outdoor sport and recreation ancillary to the school may not be inappropriate development but since the purpose of safeguarding the land is to enable the future expansion of the school rather than its outdoor facilities, that argument carries little weight. This conflict undermines the effectiveness of the policy and its consistency with national policy. Evidence of the need to expand Forest Hall Secondary School is also limited and contrasts with other sites identified to meet educational needs in the Plan which have been secured through site allocations linked to other development. Furthermore, the land is not currently available for school expansion. The landowner confirmed at the hearing that they are not prepared to make the land available for educational purposes on a standalone basis.
120. Taking those matters together, it is our view that there is insufficient justification to show that there is a need to expand Forest Hall Secondary School during the Plan period, and that to do so with the site remaining in the Green Belt would be inconsistent with national Green Belt policy. Furthermore, since the land is not currently available, there is also uncertainty about whether the policy would be effective. We have considered the advantages of safeguarding to retain the potential for expansion beyond the Plan period. However, since the land remains in the Green Belt it is already subject to a presumption against inappropriate development. Consequently, we conclude that **MM14** is required to delete Core Policy 18, its supporting text and **MM61** to delete the relevant map from Appendix 7, for justification and effectiveness.

Conclusion on Issue 4

121. We conclude that, subject to the MMs identified above, the approach to development in the Stansted Mountfitchet and Elsenham Area Strategy is positively prepared, justified, effective and consistent with national policy.

Issue 5 – Is the approach to development in the Thaxted and the Rural Area Strategy positively prepared, justified, effective and consistent with national policy?

122. While there may be potential for exploring development opportunities at Thaxted in the future, we consider that there is not currently sufficient certainty over resolving constraints on strategic scale development, principally that of primary school capacity, to support the addition of an allocation policy for Thaxted in this iteration of the Plan. **MM15** provides appropriate clarification of this position in the supporting text and we recommend it for effectiveness.
123. The settlement-based approach to allocating housing requirements to larger villages in Core Policy 19 is consistent with the spatial strategy and is clearer than using parishes as the basis for allocation, particularly where there is more than one settlement or allocation in a parish. We are satisfied that using settlement rather than parish areas is an appropriate methodology for distribution of the housing requirement among larger villages in the Plan.
124. The use of the HELAA to assess the stock of potential development sites and the Settlement Facilities Study (INF1) to assess facilities and services are helpful to that categorisation process, but we recognise that these change over time and it is ultimately a matter of planning judgment as to whether a village should be included as a larger village in the settlement hierarchy. We are satisfied that the villages categorised as larger villages in the Plan, including Debden and Henham, are appropriate.
125. **MM16** provides clarification about existing neighbourhood plans and consistency with wider mineral and waste safeguarding policies, for effectiveness. This modification also updates the residual housing requirement figures in Core Policy 19 to reflect the latest figures on housing delivery in the Larger Villages. We recommend this part of **MM16** for effectiveness.
126. The definition of building merit in Development Policy 2 needs to be more precise so that it does not unnecessarily restrict the replacement of existing dwellings in the open countryside. **MM17** makes the necessary amendment to ensure the policy's effectiveness.
127. In Development Policy 4, extending the visual impression of built development could be inaccurately interpreted as a means of protecting the openness of the countryside. This phrasing is potentially confusing to users of the policy. Modification of the policy wording in **MM18** is therefore necessary for effectiveness.
128. The second paragraph of Development Policy 5 supports the removal of permitted development rights by planning condition if garden structures would change the open character of the countryside. The ability to remove permitted development rights on a case-by-case basis provides an extra element of

protection in, for example, locations of higher landscape and visual sensitivity. We are therefore satisfied that there is clear justification for this aspect of the policy, in accordance with paragraph 54 of the Framework.

Conclusion on Issue 5

129. We conclude that, subject to the MMs identified above, the approach to development in Thaxted and the Rural Area Strategy is positively prepared, justified, effective and consistent with national policy.

Issue 6 – Are the policies for Climate Change positively prepared, justified, effective and consistent with national policy?

Net Zero Operational Carbon Development

130. Core Policy 22 sets out requirements for specified residential and non-residential developments in Uttlesford so that they are designed and built to be net zero carbon in operation. Space heating demand covers the amount of energy needed to heat a building comfortably over a year. Energy use intensity limits (EUI) cover the overall energy use per year to be achieved for these buildings. These metrics measure the operational energy use of a building, with a focus on the energy efficiency of its fabric. Together with the renewable energy elements of Core Policy 22, this focus will facilitate delivery of net zero operational carbon development in advance of and without reliance on decarbonisation of the electricity grid.

131. The Written Ministerial Statement, 'Planning - Local Energy Efficiency Standards Update' December 2023 (WMS) discourages the proliferation of local standards because of the risk of them adding complexity and undermining economies of scale. The WMS requires that any additional energy efficiency requirement beyond current or planned building regulations be expressed as a percentage uplift of the Target Emissions Rate (TER). Core Policy 22 does not use the TER metric but rather adopts alternative metrics, as noted above. We have therefore given careful consideration as to whether a departure from the WMS is justified in this case.

132. The Climate Change Evidence Base (CC1) for the Uttlesford Local Plan considers the TER metric, pointing out that because TER does not measure the actual energy performance of buildings, it would be difficult to show exactly what proportion of TER reduction would be justified in policy terms. The alternative space heating demand and EUI metrics would not have this shortcoming and would as a result be a more effective and appropriate measure for delivery of net zero operational carbon development.

133. Furthermore, judging by a number of local plans that are either recently adopted or emerging, for example Tendring Colchester Borders Garden Community Development Plan Document and Chelmsford Local Plan, there is a growing trend for net zero carbon building standards that go beyond current and planned building regulations in Essex. This is influenced by the model planning policy position for net zero carbon development recommended by Essex County Council. There is therefore a degree of consistency in Essex to the adoption of the metrics used in Core Policy 22, which reduces the novelty of such an approach for developers in the County. It is also the case that the use of the EUI metric is becoming more common nationally.

134. We have considered the effect of achieving net zero carbon in operation on the viability of new development and are satisfied that realistic build-cost uplifts have been factored into Viability Assessment Stages 1 and 2 (INF7 and INF8). In the light of this, we accept the viability assessment reports findings that there is reasonable prospect of the Plan's strategic allocations coming forward viably.

135. The Future Homes Standard (FHS) is due to be introduced through a change to Building Regulations. This aims to make new homes 'zero carbon ready', as a step towards net zero in 2050. The FHS aims to achieve a 75% reduction in carbon emissions. The additional cost of achieving net zero housing in line with Core Policy 22 would constitute a lesser proportion of overall build costs once the planned FHS is introduced.

136. Requirement 3 of Core Policy 22 allows for the possibility of a site-wide residential average approach to EUI limits for dwellings on larger sites, but only in exceptional circumstances. We are satisfied that this provides proportionate flexibility. Requirement 5 of Core Policy 22 requires energy monitoring of eligible new development during the first 5 years of operation. Given the relative ease of calculating EUI performance, we consider that this requirement would not be excessively burdensome on developers.

137. While undoubtedly an ambitious approach, the requirements in Core Policy 22 would help design buildings in ways that contribute to significant reductions in greenhouse gas emissions, which is consistent with the approach to mitigating and adapting to climate change in the Framework. Given the above conclusions we find that there is a justified rationale for the approach taken in Core Policy 22. Although the use of alternative metrics to TER means that it departs from the WMS, that departure is justified by the evidence presented to us and the objectives of the Plan in addressing climate change.

138. The phrasing of the strength of Requirement 1 of Core Policy 22 needs to be articulated more clearly. Also, clearer articulation of the level of on-site solar PV generation for new developments is needed in Requirement 4 of Core Policy 22. **MM19** makes these amendments for effectiveness.

Other Climate Change Policies

139. Core Policy 23 goes beyond the basic compliance requirement within Building Regulation Part O and instead adopts the more sophisticated dynamic thermal modelling approach that is permissible under Part O. It does this by requiring integration of the concept of the cooling hierarchy into development design, and encourages the use of the Chartered Institute of Building Services Engineers' dynamic thermal modelling standards for major development.
140. In so doing, the policy facilitates a more effective design response to overheating risk. Therefore, Core Policy 23 does not simply duplicate Building regulation and so is not inconsistent with Written Ministerial Statement UIN HCWS495, dated 15 December 2021, which seeks to avoid such duplication. Given the above, we are satisfied that Core Policy 24 is sound.
141. National planning policy and Building Regulations do not currently mandate limits on embodied carbon. However, the targets specified as assessment standards for large scale new build developments in Core Policy 24 reflect emerging industry methodology in this field. Given this, the policy's whole life carbon assessment-based approach will help large scale development to minimise embodied carbon and maximise reuse. We consider that Core Policy 24 is consistent with the Framework's requirement to support the transition to a low carbon future.

Conclusion on Issue 6

142. We conclude that, subject to the MMs identified above, the policies for Climate Change are positively prepared, justified, effective and consistent with national policy.

Issue 7 - Are the policies for Transport positively prepared, justified, effective and consistent with national policy?

143. The spatial strategy of the Plan seeks to place new development in locations that are already accessible to employment opportunities, facilities and services. However, it is inevitable that development will place further demands on existing transport networks. The Council has actively co-operated with the bodies responsible for those transport networks in developing the Plan, including National Highways and Essex County Council as the local highway authority. In recognition of the need to minimise additional pressures on transport networks, and to minimise increases in greenhouse gas emissions from motor vehicles, the Plan seeks to encourage the use of sustainable forms of transport such as walking, cycling and public transport, and a greater use of electric vehicles.

144. Core Policies 26-32 complement the sustainable transport requirements and initiatives associated with individual site allocations as set out in the site templates and infrastructure delivery plan. They include support for sustainable transport connectivity between development sites and key services and facilities, require transport assessments for certain developments, promote active travel routes for walking and cycling, maximise opportunities to use electric and low emission vehicles including bicycles, protect and enhance public rights of way, take account of parking standards, and support the development of local delivery hubs to reduce heavy goods vehicle movements, particularly in rural and residential areas.

145. Core Policy 27 requires further explanation as to the purpose of a transport related Carbon Emissions Quantification Statement, the expectation that highway mitigation will be provided directly by a developer unless exceptional circumstances apply, and that construction management plans include highway surveys where necessary. **MM20** makes these modifications for clarity and effectiveness.

146. As submitted, Core Policy 31 requires cycle parking to be located in a prominent place. While promoting the use of bicycles is consistent with the approach adopted in the Plan, that requirement is unduly prescriptive and could lead to inadvertent conflicts with design objectives. For effectiveness, **MM21** amends the policy using a list of criteria to provide greater flexibility in design terms. **MM21** also includes greater flexibility in the provision of electric car clubs where off-site facilities would be more appropriate, for effectiveness and justification.

147. As noted earlier, **MM21** also introduces new wording preventing off-airport related parking and requiring developments to deter 'fly parking' and **MM22** deletes supporting text and introduces a new policy relating to aerodrome and military safeguarding. The explanation for these modifications is set out in detail in our comments on London Stansted Airport.

Conclusion on Issue 7

148. Subject to the MMs to policies set out above, we conclude that the policies for Transport are positively prepared, justified, effective and consistent with national policy.

Issue 8 – Are the policies for the Environment positively prepared, justified effective and consistent with national policy?

149. The water supply region in which Uttlesford is located is classified as an area of serious water stress. The proposed minimum water efficiency standard in Core Policy 34 is 90 litres per person per day (l/p/d) for all new residential development. This is more demanding than the optional Building Regulations standard of 110 l/p/d where there is local water stress, and the 100 l/p/d

standard which the DEFRA Plan for Water suggests will be considered as a new minimum in areas of serious water stress.

150. While recommending 110 l/p/d to 2030, the Stage 2 Water Cycle Study (WAT2) also recommends that the Plan should allow for future reductions in the Building Regulations target to 90 l/p/d by 2030 and that developers be encouraged to achieve 90 l/p/d or lower now. Furthermore, the Chalks Stream Final Report (WAT3) recommends a standard of 90 l/p/d throughout Uttlesford to help mitigate against the level of water stress in the region. Given the direction of travel towards the 90 l/p/d standard for residential development and the particular environmental circumstances of the area, we are satisfied that this standard is appropriate.
151. For effectiveness, the phrasing in Core Policy 34 needs to be amended to more clearly articulate that its water efficiency standard for all new residential development is a requirement, and not optional. Also, the expected water efficiency standards for building retrofitting and for development proposals involving refurbishment or change of use should be the same as for other development. To help ensure effective drainage provision for new development, reference to Lead Local Flood Authority guidance and Water Work Directive 'good' status is to be added to the infrastructure section of the policy. **MM24** makes the necessary amendments for effectiveness.
152. To help plan for flood risk, some aspects of Core Policy 36 need to be more clearly articulated. These are application of the sequential approach in line with national policy, the circumstances in which floodplain compensation will be required, the range of flood extents and levels to be modelled as part of site-specific flood risk assessments, and the role of sustainable drainage systems (SuDS) in managing surface water. **MM25** modifies these aspects of Core Policy 36, for effectiveness and consistency with national policy. Although we are examining the Plan under the Planning Practice Guidance as it was in December 2023, we consider that the policy remains consistent with more recent changes on flood risk made to it since the hearing.
153. For safe and effective coordination of SuDS schemes and aviation safety, reference to aviation locations needs to be expanded to include Duxford Aerodrome and Carver Barracks Airfield, in line with new Core Policy 32a on Aerodrome and Military Safeguarding. Also, requirements for consultation with London Stansted Airport about development proposals in its vicinity should be added to this policy, because of the potential to increase bird strike. **MM23** and **MM26** make the required modifications for effectiveness.
154. To address the risk of harm from recreational pressure on sites designated for biodiversity, Core Policy 38 needs to be clearer on when Suitable Alternative Natural Greenspace (SANG) requirements apply to development within the

Essex Coast Zone of Influence, and when Strategic Access Management Measures (SAMM) apply to development within Hatfield Forest's Zone of Influence. **MM27** provides the required amendments for effectiveness. To help ensure effective use of Core Policy 38, **MM27** also names the full range of statutory and non-statutory designations to which this policy applies.

155. To help secure the management and maintenance of green infrastructure, the requirement for a Landscape and Ecological Management Plan (LEMP) for major development proposals needs to be added to Core Policy 39. Also, for a safe and effective approach to coordinating enhanced green and blue infrastructure proposals and aviation safety, being mindful of the risk of bird strike, cross reference with Core Policy 32a on Aerodrome and Military Safeguarding needs to be added to Core Policy 39. **MM28** makes the necessary amendments on these matters, for effectiveness.
156. Core Policy 39 on green and blue infrastructure, together with other related policies in the Plan will help minimise recreational pressures on Hatfield Forest. We find that modification beyond those already proposed is not necessary to make Core Policy 39 sound.
157. In terms of habitat and species variety, Uttlesford's biodiversity levels are well below those of other districts of similar size and population. This is principally as a result of intensive arable farming having depleted biodiversity and habitat connectivity. There is therefore a particularly strong need to secure measurable net gains for biodiversity in the Plan. The Stage 2 Viability Assessment Report (INF8) shows that requiring a minimum 20% biodiversity net gain will help address this deficit and generally would not result in excessive cost.
158. We accept that there are locally specific circumstances that justify setting a biodiversity net gain target above the 10% required by the Environment Act 2021. However, it is not possible to be certain of the exact effect of accommodating an increased biodiversity net gain on the viability of all development proposals. It is therefore necessary to allow for a biodiversity net gain of less than 20% (but not less than 10%) if it would prevent a development from being viable. **MM29** modifies Core Policy 40 to provide the necessary flexibility. For effectiveness, **MM29** also clarifies which development is exempt from statutory biodiversity net gain requirements, and the requirement for a biodiversity gain plan to be approved before commencement of development.
159. Paragraph 2 of Core Policy 41 on landscape character needs to be more realistically flexible about the degree of landscape enhancement that developments can achieve. **MM30** amends this section of the policy for effectiveness.

160. Protection of public health in relation to air quality needs to be made more effective by strengthening the phrasing from 'might' to 'if', when considering potential significant adverse effects of development. Also, what is meant by 'amenity and protected sites' should be more clearly defined. **M31** modifies these aspects of Core Policy 43 for effectiveness.
161. To enable the effective application of Core Policy 44 in relation to noise, figures quantifying the lowest observed adverse effect level for aviation noise and maximum outdoor noise level on school sites need to be added. **MM32** makes the necessary modifications for effectiveness.

Conclusion on Issue 8

162. Subject to the MMs identified above, we conclude that the policies for the Environment are positively prepared, justified, effective and consistent with national policy.

Issue 9 – Are the policies for Economy and Retail positively prepared, justified, effective and consistent with national policy?

163. The Plan adopts a positive approach to economic growth, building on the area's strengths and supporting the expansion of employment land to meet local needs and wider opportunities. That approach is in line with local economic strategies and consistent with national planning policy which seeks to create the conditions in which businesses can invest, expand and adapt, as well as supporting a prosperous rural economy.
164. In addition to the overarching strategy set by Core Policy 4 and the employment allocations contained in the area strategies, Core Policies 45-51 provide further detailed support and requirements relating to commercial and retail uses. The suite of policies provide protection of existing employment space while recognising where flexibility is needed to accommodate alternative uses arising from changes in the economy or ancillary uses needed to support the primary function of employment sites, policy for new employment development on unallocated sites, promotion of employment and training schemes, ensuring the viability and vitality of town and local centres, and supporting tourism and the visitor economy. Development Policies 6-9 provide further detail on hot food takeaways, new shops or cafes in smaller settlements, and proposals for self-catering accommodation.
165. The existing employment sites protected by Core Policy 45 include 2 commercial estates at Taylors End and Stansted Northside at London Stansted Airport. These areas fall within the operational airport boundary but are publicly accessible and provide land for general as well as airport-related businesses. On that basis we consider that the land does contribute to the wider

employment needs of the area and it is therefore appropriate for them to be protected in the same way as other employment areas. We consider their designation as existing employment space to be sound.

166. Core Policy 48 supports provision of new employment development on unallocated sites if certain criteria are met. The policy operates subject to the phrase 'where there are exceptional circumstances'. However, that term is not defined. The criteria provide sufficient explanation of when support should be given to employment development on unallocated sites and we consider the highlighted phrase to be unnecessary as well as undefined. **MM33** deletes the phrase for effectiveness.
167. Core Policy 49 requires larger developments to provide a range of employment and training benefits through an Employment and Skills Plan. However, there is a degree of inconsistency with the Essex County Council Developers Guide on which it is based. To resolve that tension, it is necessary to provide for some flexibility, particularly in medium sized developments, where it may be difficult to meet the terms of such a policy. For effectiveness, **MM34** modifies the policy wording accordingly and adds a paragraph to the end of the policy to allow a financial contribution in lieu for alternative employment and training.
168. Core Policy 50 provides for the use of planning conditions to constrain changes of use within Class E where appropriate. National policy requires that planning conditions should not be used to restrict national permitted development rights unless there is clear justification to do so. We accept that the town and local rural centres in Uttlesford are relatively small, and the conversion of large out-of-town commercial units to retail or other main town centre uses could potentially undermine the vitality and viability of those centres. That would undermine the network and hierarchy of centres identified in the Plan and run counter to national policy which seeks to ensure the vitality of town centres. We are therefore satisfied that there is clear justification in the case of Uttlesford to constrain the flexibility of Class E in appropriate circumstances, and no modification to the policy is required.
169. Core Policy 51 supports tourism and leisure uses, subject to criteria. One criterion supports ancillary hotel and conference facilities at London Stansted Airport and Chesterford Research Park. As drafted, it would limit the hotel facilities to business use only. We consider such a restriction is unnecessary. **MM35** removes the need for such facilities to be solely business focused, for effectiveness.

Conclusion on Issue 9

170. Subject to the MMs to policies set out above, we conclude that the policies for Economy and Retail are positively prepared, justified, effective and consistent with national policy.

Issue 10 - Are the policies for Building Healthy and Sustainable Communities positively prepared, justified, effective and consistent with national policy?

171. Core Policies 52 and 52a deal with good design, with Development Policy 9 adding further detail on public art. Achieving well-designed places remains a key aspect in the Framework and inclusion of such policies is therefore consistent with national policy. The policies are further supported by the Uttlesford Design Code and the Essex Design Guide. For effectiveness, Core Policy 52a requires modification to refer to the need to respect site constraints arising from existing utilities when designing new development. **MM36** makes that change.
172. Core Policies 53 and 55 set requirements for residential standards. These provide policy support for a mix of dwelling sizes to meet local needs, the use of optional building regulations on accessibility, and the use of minimum internal and external space standards. As drafted, Core Policy 53 imposes a policy requirement based directly on the Local Housing Needs Assessment. As this assessment is not subject to examination, and changes on a periodic basis, it is necessary to rephrase the policy. **MM37** does that for effectiveness.
173. The evidence presented to us in the Local Housing Needs Assessment (HOU1) supports the M4(3) optional technical standard for wheelchair user dwellings on major residential schemes of 5% of market homes and 10% of affordable homes. The standard in Core Policy 53 requires twice that level of provision. We note the Council's argument that dwellings included in the housing trajectory which have already been permitted will not be subject to the requirement to meet the M4(3) standard and that will reduce the number of units meeting the standard over the plan period. However, the higher standard in the policy is not justified by evidence and it is unfair to expect development yet to be permitted to make up for current deficiencies in provision. The cost of meeting the M4(3) standard is significant, and even with the policy acknowledging that viability may be a reason for not meeting the requirement, it would introduce differing costs for developments without good reason to do so. We conclude that **MM37** is necessary for justification such that for major residential schemes the M4(3) standards should accord with the evidence in the Local Housing Needs Assessment (HOU1).
174. Core Policy 56 requires affordable dwellings to be distributed throughout a new development in groups not larger than 10 units. While the aim of distributing affordable units throughout a scheme rather than being concentrated in one part is a legitimate planning approach, we consider the limitation to no more than 10 units is unnecessarily restrictive both in terms of layout design and ease of management by registered social providers. **MM38** modifies the policy wording to allow flexibility for effectiveness.

175. The current (2024) version of the Framework does not exempt major self-build/custom built development from providing affordable housing. However, as we are examining the Plan under the 2023 version of the Framework it is necessary for us to reach a view on this point. Having considered conflicting legal opinions, it is our view that the Council is correct in its interpretation. There is a distinction between the requirement to provide affordable housing and a proportion of that as affordable home ownership. The exemption provided to people who wish to build or commission their own homes only applies to the affordable home ownership element, not to the requirement to provide affordable housing as a whole. We conclude that there is insufficient justification to modify Core Policy 56 on this point.

176. Core Policy 57 sets out criteria to guide decisions on changes of use to houses in multiple occupation. We support the approach taken but consider that criterion iii lacks precision on defining what constitutes a continuous frontage. **MM39** introduces additional wording for effectiveness.

177. Changes to the Green Belt boundary are proposed in 3 locations where development has occurred and so already extends buildings into the Green Belt. We consider that the requirement in paragraph 148 of the Framework to define boundaries clearly, using physical features that are readily recognisable and likely to be permanent constitute exceptional circumstances to justify the release of Green Belt in these locations. As the Plan has identified sufficient land to meet development needs without needing to release any further Green Belt sites, there is no need to carry out a review of the Green Belt as part of the Plan.

178. Core Policy 60 allocates 18 additional pitches to meet need in the first 5 years of the Plan as identified in the Gypsy and Traveller Accommodation Assessment (GTAA) (UTT4), plus a criteria-based approach to meeting need for the remainder of the Plan period. UTT4 was an interim assessment carried out specifically for Plan preparation, pending a more comprehensive GTAA which was being undertaken on an Essex county-wide basis. After the Plan was submitted for examination, the Uttlesford District Council Gypsy and Traveller Accommodation Assessment Final Report December 2024 was published and now provides a more comprehensive GTAA. This quantifies a much higher need for 90 pitches in Uttlesford over the whole plan period, including 26 pitches in the first 5 years. This uplift in identified pitch need will require further community engagement and is likely to result in additional allocation of Gypsy and Traveller sites.

179. The Council has responded to this new evidence by committing to the production of a separate Gypsy and Traveller DPD. Having regard to this commitment and the desirability of avoiding significant delay to adoption of the Plan, we consider this is an appropriate approach to take. Accordingly, Core Policy 60 needs to be modified to update the pitch requirement and to explicitly

commit the Council to carrying out a Gypsy and Traveller DPD. **MM40** provides the necessary modification for justification and effectiveness.

180. To assist with assessment of heritage significance, the requirement for a heritage statement should apply to non-designated heritage assets as well as designated assets. **MM41** provides the necessary modification for effectiveness.
181. Core Policy 64 does not sufficiently reflect the Framework's distinction in approaches to non-designated and designated archaeological assets. **MM42** modifies this policy for consistency with national policy.
182. Registered Parks and Gardens are an important part of Uttlesford's distinctive historic environment. To help ensure effective conservation of these designated heritage assets, landscape planning and design considerations need to be set out in a separate policy. **MM43** makes the necessary modification, adding Core Policy 64a on Registered Parks and Gardens to the Plan for effectiveness.
183. To help plan for health and wellbeing, Core Policy 66 should require a more comprehensive range of development proposals to include Health Impact Assessments. It should emphasise the importance of early and proactive engagement with the Health Impact Assessment process, and it should make fuller reference to relevant local health and wellbeing strategies and guidance. **MM44** makes the necessary amendments to Core Policy 66 for effectiveness.
184. Core Policy 68 supports new community uses and protects existing community facilities unless it can be shown that they are no longer needed. The policy should articulate more clearly what is meant by community uses and what information is expected if a community facility is no longer viable. **MM45** makes the necessary modifications for effectiveness.

Conclusion on Issue 10

185. Subject to the MMs set out above, we conclude that the policies for Building Healthy and Sustainable Communities are positively prepared, justified, effective and consistent with national policy.

Issue 11 - Is the strategy for Monitoring and Implementation effective and appropriate?

186. Core Policy 71 commits the Council to monitoring development to ensure that the objectives of the Plan are achieved, with contingency measures in the event that there is significant variance from them. The annual Authority Monitoring Report will be used to establish whether the Plan is being effectively implemented. Where evidence suggests that policy-specific targets listed in the

Monitoring Framework at Appendix 18 have not been met, actions set out in the Monitoring Framework will be taken.

187. Paragraph 75 of the Framework says that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period. **MM46** adds suitable wording to the Monitoring and Implementation Chapter and **MM64** adds the trajectory in Appendix 20 for effectiveness and consistency with national policy. **MM46** also refers to new Policy 2a in the event that a Local Plan review is required because of a lack of a 5-year housing land supply.
188. For allocated strategic development sites, **MM47** clarifies for effectiveness the Council's expectation that plans or statements covering Green and Blue Infrastructure, Biodiversity and Habitat Management and Monitoring be included as part of the application.
189. Allocated sites on land north of Taylors Farm, Land between A120 and Stortford Road B1256, Elsenham and Gaunts End, Water Circle Estate lie within land identified in the Essex Minerals and Waste Local Plans as having potential as mineral resources and/or waste recycling. The County Council has raised no objection in principle to the inclusion of the sites in the Plan but it will still be necessary for assessments to be undertaken at the application stage on these matters. **MM52**, **MM54**, **MM58** and **MM59** add these requirements to the respective site development templates for effectiveness. Minor corrections have been made to the wording of **MM52** and **MM54** for clarity.

Conclusion on Issue 11

190. We conclude that the strategy for Monitoring and Implementation is positively prepared, justified, effective and consistent with national policy.

Overall Conclusion and Recommendation

191. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that we recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.
192. The Council has requested that we recommend MMs to make the Plan sound and/or legally compliant, and capable of adoption. We conclude that with the recommended main modifications set out in the Appendix, the Uttlesford Local Plan 2021-2041 satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.

Guy Davies and William Cooper

INSPECTORS

This report is accompanied by an Appendix containing the main modifications.