

Appendix 4: Regulation 18 Comment Summaries and Responses

Chapter 1: Introduction

July 2024

Table 1: Chapter 1: Introduction 2

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Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP2576	Stebbing Parish Council				5-Year Housing Land Supply Requirement	What evidence exists in relation to housing growth on a yearly basis that shows Uttlesford will meet its 5-Year Housing Land Supply requirement at the point of Local Plan adoption?	The Council have published a Housing Trajectory 2021-2041 which sets out projected housing delivery over the Local Plan period based upon research of typical lead-in times and build-out rates of development sites. This document sets out that the Council will be able to demonstrate a 5-year housing land supply upon the point of adoption. This trajectory will be updated for the Regulation 19 Local Plan publication.
NDLP2346	Richard Haynes				Call for Sites' Assessment	Why weren't Neighbourhood Plan Policies considered when assessing the parcels of land submitted under Uttlesford's 'Call for Sites'?	The Site Selection Topic Paper sets out the procedure taken for sifting and assessing each of the potential sites submitted through the Call for Sites process. This procedure operated under a 'policy off' position, whereby Development Plan policies were not weighed into the assessment of sites, given that the legal requirements and strategic objectives of the draft Local Plan are contextually different to either the adopted Local Plan or made Neighbourhood Plans.
NDLP2558	Geoff Bagnall						
NDLP941	Sarah Brewin						
NDLP2419	Saffron Walden Town Council				Community Stakeholder Forum	The Community Stakeholder Forum was last held in 2021 and should be re-run to ensure community feedback is as up to date as possible.	. The Council have a Local Plan Panel that meets monthly for a range of cross party District Councillors that replaces the forum. However, the Regulation 18 Draft Plan was subject to six weeks consultation and the Regulation 19 will be subject to eight weeks consultation which fully meets or exceeds the regulatory requirements.
NDLP2544	Geoff Bagnall				Conflicts of Interest	The introduction should state the organisations with commercial interests in the allocation of land within the Local Plan.	There are no conflicts of interest as implied by the comment. The selection of sites is a transparent process that follows consistent methodology - and in no cases have any proposals or decisions been based on who does or does not own any particular land.
NDLP2717	Paula Griffiths				Core Policy Placement	Overarching Core Policies should all be set out nearer the beginning of the Local Plan.	The Council is satisfied the structure of the document is logical with overarching policies first, strategic focus on locations second, and then any wider development policies third. This is considered important as it is the places of Uttlesford that should take greater precedence over more generic development-based policies.
NDLP2417	Saffron Walden Town Council				Council Culture and Governance Auditing	Council culture and governance auditing should be added as a bullet point beneath paragraph 1.2.	Noted. The Council will review the bullet points following paragraph 1.2, however, it is noted that these concern themselves with planning considerations as they relate to development, therefore the suggested inclusion may not be appropriate in this context.
NDLP2718	Paula Griffiths				Cross Referencing	The main text should cross refer to the appropriate appendices, especially the Site Development Templates.	Noted. The Council will seek to improve cross-referencing to appendices within the next draft of the Local Plan.
NDLP297	Sally Taylor	Councillor Birchanger Parish Council			Delivery and Maintenance of Supporting Infrastructure	Existing infrastructure is already overstretched, and it is not guaranteed that the proposed infrastructure will be delivered. Further, the ongoing maintenance of such infrastructure from third parties is not guaranteed and more detail should be provided on future provision.	The Local Plan has sought to deliver housing growth, accompanied by infrastructure, at the most sustainable settlements within the district. Where possible, it is sought that new infrastructure (including primary and secondary school provision, country parks, health facilities etc.) helps to alleviate existing shortfalls in infrastructure as a result of previous speculative development. Given that so much development has come forward on a speculative basis without sufficient planning for infrastructure, this approach is the best available - not supporting development in this way would make it even more difficult to address the shortfall in provision. The inclusion of infrastructure requirements within the Site Development Templates will ensure that the Council will be in the strongest possible position to require future planning
NDLP319	Mrs Jane Sharp						
NDLP813	Susan McCarthy						
NDLP1265	Julian Sayer						

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NDLP443	Jennie Jones						applications to meet the necessary infrastructure provision. The Site Development Templates and associated infrastructure requirements are being reviewed as part of the Regulation 19 Local Plan following the feedback received from the Regulation 18 consultation.
NDLP1895	Keith Exford				Delivery of a New Local Plan once adopted	Requesting that the trust be regained from UDC to deliver on the policies in the adopted local plan in accordance with national planning policy.	The Local Plan includes a monitoring policy and monitoring framework that ensures effective delivery of local plan policies.
NDLP2416 NDLP2421	Saffron Walden Town Council Saffron Walden Town Council				Development Beyond the Plan Period	The wording of Paragraph 1.2 should be amended to remove assertions on the sustainability of development beyond the plan period which may prejudice future planning policies and decisions. Paragraph 1.19 should be clearer in stating that a Local Plan Review is not merely administrative but may include significant changes, including additional allocations for development. What will trigger the Local Plan reviews?	Paragraph 1.2 doesn't make any reference to development beyond the plan period - it simply states that the Local Plan will help to inform future development, which is factually correct. Reference to Local Plan reviews is consistent with national policy. Local Plan Reviews are triggered every 5 years and are necessary ""to ensure that policies remain relevant and effectively address the needs of the local community"" (Planning Practice Guidance: Plan-making). Reviews should be proportionate to the issues in hand.
NDLP319 NDLP927	Mrs Jane Sharp Rachel Backshall				Doesn't Comprise Sustainable Development	The proposed allocations would result in unsustainable development which overburden existing infrastructure.	The spatial strategy deliberately focuses on the main and most sustainable settlements, these will help to maximise use and enhancement of public transport.. Delivering housing at these sustainable settlements is the only mechanism available to the Council to help to redress the significant infrastructure deficit created as a result of speculative development.
NDLP2653	East Herts District Council				East Herts District Council - Omission of a Policies Map	A Policy Map to accompany the draft Local Plan would be helpful by providing a geographic representation of the proposed changes.	Acknowledged, a Policy Map will be produced to support the Regulation 19 version of the Local Plan.
NDLP2652	East Herts District Council				East Herts District Council - Reference to the 2012 NPPF	Reference to the tests of soundness in the 2012 National Planning Policy Framework (NPPF) should be replaced with reference to the 2023 version of the NPPF.	Acknowledged, this will be picked up within the Regulation 19 version of the Local Plan.
NDLP3306	24/7 Investments Limited				Inclusion of Amended Settlement Boundaries	A visual representation of amended settlement boundaries are necessary to account for previous development and the site allocations within the Local Plan.	Acknowledged. Updated settlement boundaries for the Key Settlements and Local Rural Centres will be produced in support of the Regulation 19 Local Plan as part of the Policies Map. It is not proposed to include any development boundaries for any other category of settlement as this provides greater flexibility for Development Management.
NDLP1895 NDLP2022	Keith Exford Little Canfield Parish Council				Issues with existing development	The existing development in the district has been of poor quality and that the local plan must take priority to address insufficient infrastructure contributions.	Noted, the local plan will provide clear direction for policy by properly planning housing and commercial sites with the sufficient infrastructure to support them.
NDLP2548	Geoff Bagnall				Lack of a Community-led Plan	Councillor involvement in the development of the Local Plan was not sufficient to respond to local community needs.	The Local Plan is the Councils Plan - and has been subject to full and normal democratic processes. The Local Plan Panel met regularly to consider progress on the Plan, but there were also full Cabinet and Council meetings before proceeding with the consultation. Informal meetings are also held on a regular basis with the Portfolio Holder for Planning and LPP Chair (for example).
NDLP3207 NDLP3744	Ceres Property Denise Gemmill				Local Plan Evidence	The evidence includes bias and omissions, with a more balanced and complete assessment needed. The need to meet the deadline to submit the Local Plan (June 2025), issued by the Government, has resulted in a rushed evidence base which is difficult to comment on and doesn't include a new Green Belt Review.	The Council consider that the evidence informing the Local Plan has been brought forward in an unbiased manner. The published Addendum to the Green Belt Review 2016 is clear that an updated review was not undertaken due to the lack of exceptional circumstances required to justify Green Belt release. It should also be noted that the suite of evidence

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NDLP3746	Denise Gemmill						published for Reg 18 consultation is more substantive than for many Councils Local Plan consultation, that often only include 'issues and options' at Reg 18 stage. Undertaking a full consultation on a substantive evidence base at Reg 18 has enabled a much fuller consultation which helps to inform the Reg 19 stage of the process, which will also be subject to publication.
NDLP3788	Belinda Challenger						
NDLP3904	Pelham Structures Limited						
NDLP3911	Pelham Structures Limited						
NDLP3928	Pelham Structures Limited						
NDLP4102	Tye Green Farm						
	Pascale Muir						
NDLP2689	Saffron Walden Town Council						
NDLP2418	D J Bagnall						
NDLP2543	Geoff Bagnall						
NDLP2545	Geoff Bagnall						
NDLP2546	Lands Improvement Holdings						
NDLP3857							
NDLP146	Mr Bill Critchley				Local Plan Timetable	Will there be a consultation on an amended plan which has taken into consideration the comments submitted at Regulation 18 stage?	Yes, the Regulation 19 version of the Local Plan will be published in Summer 2024 for a further round of public consultation. The comments made by the public within this second round of consultation will then be provided to a Government appointed Inspector who will examine the Local Plan following its submission by the Council.
NDLP3784	Ministry of Defence Safeguarding				Ministry of Defence - Consultation	The Ministry of Defence note their role as a statutory consultee of the Local Plan in safeguarding certain technical sites.	Acknowledged. The Council will work with the MoD to ensure the appropriate safeguarding of sites/assets.
NDLP2719	Paula Griffiths				Missing Hyperlinks	Certain links within the footnotes are not functioning. It would also be beneficial to have a link to the Habitat Regulations in paragraph 1.33.	Acknowledged. The Council will look to rectify any issues with the hyperlinks within the Regulation 19 version of the Local Plan.
NDLP2422	Saffron Walden Town Council						
NDLP297	Sally Taylor	Councillor Birchanger Parish Council			National Policy Changes	National policy changes could render the draft Local Plan redundant.	The Council are obligated to prepare a new Local Plan in as efficient a manner as possible to provide greater certainty within the planning process and ensure significant improvements in development outcomes. Whilst national policy is always capable of changing, Government have published clear transitional arrangements will provides an opportunity for

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							Councils to submit plans up to June 2025 within the current framework.
NDLP502	Nigel Tedder	Managing Director New Homes Project Managements Limited	Nigel Tedder		Neighbourhood Plans	How will villages that already have a made Neighbourhood Plan provide for their dwelling allowance?	Where the Parish Council of a larger village has agreed to accommodate their dwelling requirement, this will occur through the preparation of a new Neighbourhood Plan with appropriate site allocations. If the Parish for any identified Larger Villages have an existing Neighbourhood Plan, and they do not wish to update their Plan, the allocations will be included in the Local Plan.
NDLP319 NDLP443 NDLP3746	Mrs Jane Sharp Jennie Jones Denise Gemmill				Omission of a New Settlement	The Local Plan should account for the delivery of a new settlement, rather than distributed growth.	There may be a need to plan for a new Garden Community in Uttlesford in the future, but this plan needs to plan for c. 5,000 additional homes in total and it wouldn't be appropriate to plan for all of this on one site. The plan must be capable being found sound at examination and that includes, for example, achieving a five-year land supply. This means that a range of sites of different size, type and geography are essential to ensure the housing can be delivered quickly enough. This was also a concern raised by the Inspector to the rejected plan in 2019. There is also a need to plan for new infrastructure and affordable housing that benefits are main and most sustainable communities across the district and to start addressing the shortfall in provision at these locations. On this basis, planning for a new settlement at this time, would constitute additional growth, it would not be a replacement for what is currently being proposed.
NDLP2891	Martyn Everett				Plan Ambition	A comment that states the plan is lacking ambition, particularly in relation to environmental needs. They also state that the plan is poorly presented in comparison with the 2005 plan.	The plan has amongst the most ambitious climate change and biodiversity policies of any plans being prepared. However, these will be updated appropriately for inclusion in the Reg 19 Plan.
NDLP774	Mr Neil Reeve				Planning Control of Minerals and Waste Sites	Policies/maps should be included in the Local Plan to prevent breaches of planning control in relation to minerals and waste sites.	Policy Maps relating to minerals and waste sites are the remit of Essex County Council, however, the Council will review if there is the potential to overlay these in some form through the Local Plan Policies Map.
NDLP3729 NDLP3741 NDLP3742 NDLP3743 NDLP3745 NDLP3855 NDLP3856	Countryside Partnerships Plc Denise Gemmill Denise Gemmill Denise Gemmill Denise Gemmill Grosvenor Property UK Grosvenor Property UK				Policy Context	These comments provide contextual information only. This typically comprises of quotations of the National Planning Policy Framework, the Planning Practice Guidance, or comments made by the Inspector in relation to the previously withdrawn Local Plan.	The Council acknowledge the comments and the NPPF requirements against which the Local Plan must be found 'sound'.

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NDLP3857	Lands Improvement Holdings						
NDLP3858	Grosvenor Property UK						
NDLP3872	Grosvenor Property UK						
NDLP3879	Grosvenor Property UK						
NDLP3958	The Streeter Family						
NDLP3964	The Streeter Family						
NDLP3971	AC Streeter						
NDLP3979	Hawridge Strategic Land						
NDLP4056	Salacia Ltd						
NDLP4129	Endurance Estates Land Promotion Ltd						
NDLP4150	Endurance Estates Land Promotion Ltd						
NDLP3631	C J Trembath						
NDLP402	Louise Johnson	Parish Clerk Elsenham Parish Council			Previous Speculative Development	The Local Plan strategy should take account of the increase in housing that has occurred speculatively over the past decade.	The Council acknowledge the scale of residential development which has occurred in the absence of an up-to-date Local Plan. The completions and commitments will be updated to April 2024 for inclusion in the Reg 19 Plan.
NDLP2780	Lorraine Flawn						
NDLP2923	Chelmsford City Council				Publication of a New Local Plan	Comments which are, in principle, supportive of the decision to publish a new draft Local Plan and the emphasis on climate change.	The Council acknowledge these comments.
NDLP3303	24/7 Investments Limited						
NDLP3312	The North West Essex Constituency Labour Party						
NDLP3355	Gladman						

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NDLP3477	Richstone Procurement Ltd						
NDLP3532	Ashdon Neighbourhood Plan Steering Group						
NDLP3735	Enterprise Residential Development						
NDLP85	Katy Payne						
NDLP202	David Higginson						
NDLP64	Robert Woods						
NDLP66	Albert Gerhard						
NDLP128	Colin Day						
NDLP435	Diana Frost						
NDLP783	Roderick Jones						
NDLP1259	Mr Andrew Taylor						
NDLP1877	Mike Mitchell						
NDLP1849	Catherine Figge						
NDLP2169	Jennifer Versey						
NDLP2574	Stebbing Parish Council						
NDLP2619	Jonathan Ashe						
NDLP2647	Future Workplace						

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NDLP2690 NDLP2715 NDLP2780 NDLP1895 NDLP1781 NDLP1895 NDLP4238	Property Unit Trust Pascale Muir Paula Griffiths Lorraine Flawn Keith Exford Littlebury Parish Council Keith Exford Essex County Council						
NDLP464	Jim Pink				Purpose of the Local Plan	The Local Plan will only deliver new housing, not improve the quality of life for existing residents. Why is the previous Local Plan being superseded?	The Local Plan, through its policies and Site Development Templates, seeks to meet Uttlesford need for residential development whilst also delivering a range of supporting infrastructure. It is necessary to produce a new Local Plan as the adopted Local Plan is significantly out of date and results in residential development coming forward in an unplanned, piecemeal fashion. Further, the new Local Plan will drastically improve the requirements for sustainability measures within new developments, including for building emissions, water efficiency and biodiversity enhancements. This is an integral part of the Council's response to the climate and ecological emergencies.
NDLP394 NDLP2618	Ian Vance Jackie Cheetham				Quantity and Quality of Consultation	The quantity and quality of public consultation was insufficient.	The Council have sought to actively engage all residents in the Regulation 18 Local Plan consultation through advertisement within social media, newspapers, the Council's website, public exhibitions and the delivery of a leaflet to all households within the district. The approach fully meets or exceeds the relevant regulatory requirements.
NDLP777	Mr Neil Reeve				Reference to Heritage in Chapter 1	Reference should be made in Chapter 1 to the extent of heritage assets within the District, proportionate to the population.	Acknowledged. This change will be reviewed for the next draft of the Local Plan, however, this detail may be more appropriate for inclusion within Chapter 2.
NDLP3010 NDLP3541 NDLP3542 NDLP3543	Mr Graham Jolliffe Ashdon Neighbourhood Plan Steering Group Ashdon Neighbourhood Plan Steering Group Ashdon Neighbourhood				Relationship between the Local Plan and Made Neighbourhood Plans	The Local Plan has not taken account of made Neighbourhood Plans and it should be made clear within Chapter 1 that the strategic policies within the Local Plan may supersede Neighbourhood Plan policies where they conflict.	It is necessary for a Local Plan to be capable of being sound in itself, that is that it must be consistent with national Govt. policy, guidance and legislation. National policy makes clear that Local Plans should set 'strategic' policy, including meeting the districts housing requirement across a variety of sites and settlements. It is not always possible to do so without conflicting with 'made' Neighbourhood Plans which, by definition, look at non-strategic matters, however, the Council will continue to look to minimise conflict between these documents as far as possible.

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NDLP266 NDLP2538 NDLP2420	Plan Steering Group Mr Richard Gilyead D J Bagnall Saffron Walden Town Council						
NDLP2759	Paula Griffiths				Glossary - Scheduled Monument Reference	Scheduled Monument' should be in bold and given its own space for a definition.	Acknowledged, the Council will review this potential amendment for the next version of the Local Plan.
NDLP1177	Neil Bromley				Section 62A 'Special Measures' Designation	The Local Plan should provide context on Uttlesford's 'Special Measures' designation from the National Government.	Acknowledged, the Council will consider the inclusion of this context for the next draft of the Local Plan.
NDLP3976	AC Streeter				Small Sites	The Local Plan should not exclude sites of <100 dwellings within the site selection process, so as to facilitate short/medium term delivery.	By virtue of the substantial number of committed developments, alongside the windfall allowance and larger village allowance, the Council consider that the requirement for small sites can be met without the need to allocate sites specifically for this purpose. The Council also consider that given the extent and type of existing commitments, it will be able to demonstrate a 5-year land supply from the point of adoption of the Local Plan.
NDLP3639 NDLP3747 NDLP3980 NDLP899	Newport Parish Council Denise Gemmill Hawridge Strategic Land Mike Hannant	Newport Parish Council			Spatial Strategy	One comment suggests the Council should be planning for a higher level of housing to address affordability issues. One comment suggests that housing development at Thaxted, Saffron Walden and Great Dunmow is less preferential than Green Belt release elsewhere. Lastly, one comment states that the inspector's comments on the withdrawn 2012 Local Plan refused a distributed strategy, and that this strategy has become more challenging given historic speculative development at existing settlements.	The Council considers that it is delivering a quantum of growth which allows it to meet the affordable housing need set out within the Local Housing Needs Assessment. The Regulation 19 version of the Local Plan will also have a greater buffer above the housing need figure when compared against the Reg 18 version. As is set out within the Addendum to the Green Belt Review 2016, it is not considered that the 'exceptional circumstances' needed to justify Green Belt release exist. The Council can meet its housing need on sites of a range of geography and scale whilst benefitting from and enhancing the services of existing sustainable settlements. The strategic and policy context within which the Council are preparing the current spatial strategy varies substantially from that of the previously withdrawn Local Plans.. The distribution of residential development in a more even manner will also generate supporting infrastructure at each of the respective settlements which can help alleviate existing deficits.
NDLP443	Jennie Jones				Use of Brownfield Land	Allocating brownfield land is preferential to the release of greenfield land to meet the District's housing need.	Acknowledged. Whilst brownfield sites may exist within the district, these are, individually, not of sufficient scale to support the strategic scale of growth the Council are required to plan for.