

Appendix 4: Regulation 18 Comment Summaries and Responses

Chapter 9: Climate, Environment and Transport

July 2024

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Table 1 Core Policy 22: Net Zero Operational Carbon Development

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP1955	Mr Loftus Buhagiar				Building Design	Remarks that the requirement NOT to use fossil fuels in new building will impact on wood burners even though tree wood is renewable, and that low carbon equipment has an impact on building aesthetics. The policy suggests internal design as well as power use will need to be considered and hence designs which include wasted space e.g. large internal hall could be rejected	The net zero policies are designed to influence the design and construction of new buildings and for users then to enjoy a more energy and cost efficient home. The plan is not intended to control user behaviour. The incorporation of low carbon equipment into the design of homes will become a normal part of the design process in time.
NDLP2738	Paula Griffiths						
NDLP519	Nigel Tedder	Managing Director New Homes Project Managements Limited			Building Regulations	Questions whether this policy justified and required and whether the application of net zero policy should be stepped up over the years to align with Building Regulations? This is a critical policy to the achievement of a net zero development and requires an assessment of energy usage and space heating. The most cost effective way to secure a consistent approach is to use Building Regulations, and with FHS will ensure new development will be carbon ready by 2035. Such a national approach means different local plan approaches would not be needed especially where they go beyond current requirements with financial and land take considerations that have not been fully assessed in the evidence base. States that the PPG sets out that any local requirements for a building's sustainability and for zero carbon buildings should be based on robust credible evidence and tested for impacts on viability, and that the overall standard should not exceed the Code for Sustainable Homes level 4 and the higher. Part L of Building Regulations was updated in 2021 to achieve a 31% reduction in carbon emissions for new dwellings. Since FHS is not yet in place and is subject to consultation CP 22 is therefore premature and the requirements of the policy may be unnecessarily duplicating or exceeding the national requirements. There is no guarantee that supply chains and skills required to deliver CP 22 can be met and therefore the policy risks delays to the delivery of new housing which is contrary to the plan's intention to bring forward a new homes in the early years of the Plan. To continue to pursue standards above Building Regulations / the Future Homes Standard, the Plan needs to demonstrate that the costs of meeting these standards are feasible and viable.	Evidence suggests that this a critical policy to the achievement of a net zero development and requires an assessment of energy usage and space heating. These requirements are not reflected or achieved in the Building Regulations. The essence of this policy needs to remain until Building Regulations can achieve a similar net zero energy outcome; therefore it is preferable to rely on the mechanism of the local plan.
NDLP608	Natasha Styles	Group Planning Associate The Planning Bureau on behalf of McCarthy Stone					
NDLP1003	Daniel Jones	Director Silverly Properties Ltd					
NDLP3372							
NDLP4063	Gladman Salacia Ltd						
NDLP2861	N/A	NHS Property Services Ltd			Carbon offset	Preferable to make sure developers put in well designed and carbon neutral properties and appropriate infrastructure in a timely manner, rather than drawing off any contributions to off-set funds. Requests more detail on the carbon offset scheme financial contribution since NHS initiatives might be able to benefit from this Concern that an energy offset scheme will boost housing costs and that developers will find ways of not contributing and/or whether the Council has sufficient resources to administer such a scheme.	Observation that it is better to secure net zero energy on-site rather than developers rely on securing off-site credits. This a valid point which the plan acknowledges in the energy hierarchy approach. The offset scheme is the last resort in the energy hierarchy and is included as a fallback in case the other energy options cannot be achieved.
NDLP579	Mr John Burnham						
NDLP1991	Mr Charles Pick						
NDLP1954	Mr Loftus Buhagiar						
NDLP449	Kim Rickards	Planning Director Durkan Homes			Deliverability	It is suggested that policy is not achievable by 2025 and that 2030 would be more realistic.	The response suggest that the policy is not deliverable because the UK energy infrastructure does not have the capacity as yet and that the target date should be 2030. Whilst this may be the case for larger scale renewable energy projects it is not considered to be relevant for achieving net zero at the domestic scale in housing and mixed use developments where the application of, for example, PV would be used to counter pressure on the grid. The timing of the policy is needed to apply to the development anticipated to come forward in the early years of the plan and secure a high standard of energy efficiency now and in order to help meet local and national energy targets overall.
NDLP514	Nigel Tedder	Managing Director New Homes Project Managements Limited	Nigel Tedder				

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NDLP2003	Home Builders Federation				Local Authority powers	Queries in some detail the powers of the local authority to require energy standards that exceed Building Regulations; impact on viability; method of calculating the energy usage with impact on availability of skills to deliver the newer technology	The evidence for this policy has been collected by reputable consultancies.. Local authorities have a duty to respond to climate change and to work towards reducing carbon emissions. It is in this context that that planning policy is so formed. The t Ministerial Statement (December 2023) does not preclude the application of higher standards provided there is evidence to justify this, which the evidence underpinning the planning policies in the Plan adequately justifies..
NDLP1797	Littlebury Parish Council						
NDLP3092	Segro				Non residential	For non-residential, requests that the policy wording includes flexibility to allow targets and requirements to be negotiated if there were site or viability constraints that would make the policy requirements difficult to meet. States that viability evidence does not assess for non-residential development. Requests that text in para 9.28 about existing buildings is translated into CP22 and includes non-residential.	Review wording of policy for existing buildings and non-residential development though evidence suggests that the targets are realistic. The viability assessment for the Reg 19 Plan will be more detailed.
NDLP192	Samuel Whittome	Director Richstone Procurement Limited Director Roebuck Land and Planning Ltd	Mary Power Stacey Rawlings		Policy content	Uttlesford should use this plan to pioneer the vision." Supports Council's net zero ambition and that more emphasis on energy efficient measures, net-zero homes and recycled materials is necessary to meet climate goals. Considers that policy should not be overly prescriptive nor apply a blanket approach to climate adaptation as this can render a development unviable. Flexible policy is needed to ensure a fabric first approach and use of the most modern technology and construction techniques. The standards are current and there is need to permit a review in order to keep up with current thinking including aligning with the Active Homes Alliance, maintaining the relevance of this policy over the plan period to 2041. Asks whether a viability assessment could be submitted with each application. Considers that the standards do not need to be set for energy or water (CP1, CP22, CP23, CP24,CP34) because the Government sets the standards through building regulations or the Future Homes Standard, and quotes from NPPF(para 154b) that: "... any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards" and that these are set through building regulations. Suggests an addition that for new build development (residential and non-residential) the main roof surface and inclination faces south and is set to achieve maximum solar energy to optimise use of pv panels. The approach to heritage buildings is weak and there needs to be a balance between energy/carbon efficiency and heritage, also so that the District might become a centre of expertise in this area. Requests removal of restriction with regard to heritage buildings. The statement on proportionate offset contributions (para 9.14) should be incorporated into policy where on site requirements cannot be achieved for feasibility reasons. One respondent seeks a net negative approach to counter the buildings that cannot be retrofitted, and carbon negative for new builds in construction as well as in operation using materials with sequestered carbon like hemp, geothermal foundations, high standards of insulation, a date for no more gas grid connections, modular construction and these should be required in the plan and design code. Amendments to text suggested in 9.5, add "heat pumps and heat networks" "based on the latest research into geothermal effects on greenery" ; 9.1 Bridge End Gardens (BEG) should be specifically listed along with Hatfield Forest, as an area of high value. At the end of sentence 3 add "such as Beechy Ride.	The Plan follows from the Council's early climate action plan that focuses on 2030 but policies will endure for the life of the plan to 2041. The aim of the policies is to cover as many aspects of net zero building as possible, setting the standards to aspire to rather than the methods to attain them or the materials to use. The decarbonisation of the grid and the use of non-fossil fuels in the homes is in large part contingent on national policy and roll-out so it is not considered appropriate to insert a date. The fabric first approach underlies the energy policy. It is not considered that the policy is inflexible because it is focused on targets, and therefore it is the responsibility of the developer to attain them however they deem most appropriate.
NDLP347	Mrs Jane Sharp						
NDLP439	Mr Bill Critchley						
NDLP979	Mary Power						
NDLP931	Catesby Estates Ltd (Stacey Rawlings)						
NDLP2329	Mr Edward Gildea						
NDLP3035	Chris Dodge						
NDLP3115	Higgins Group						
NDLP3247	Weston Homes Plc						
NDLP3790	Mr Neil Reeve						
NDLP4022	Saffron Walden Town Council						
NDLP648	John Howett				Policy implementation	Viability assessment has used an 8-10% cost range to allow for net zero and quotes from research by Future Homes Hub in February 2023 that estimating cost is difficult due to different builders having diverse baselines, price risk, learning and assumptions. CP requires compliance with all five of the policy's criteria and makes no allowance	Noted. It is not possible to apply standards retrospectively to planning consents or conditions; note comments on the appropriate time to consider the Energy Statement in the planning application process . The application of the policy means that it would be operational on the adoption of the Local Plan, by 2026,
NDLP4064	Salacia Ltd						

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						for financial viability or technical feasibility on a site by- site basis. Considers this is unreasonable given the uncertainty of the available evidence, uncertainty of Government national requirements and that the viability assessment cannot capture all possible site-specific circumstances. CP22 requires all major applications to be supported by a full energy strategy utilising accurate methods for operational energy use prediction. This requirement is not considered practical or proportionate for outline applications and suggests the requirement should apply only where details of appearance, layout and scale are being sought for approval. A separate suggestion that the policy is applied immediately including to the recent consent for c 1000 homes.	and not to current consents though can be addressed in pre-application discussion.
NDLP3344	Welbeck Strategic Land	Field Officer Rural Community Council of Essex			Policy viability	The Warrington Local Plan Inspector's Report (October 2023) referencing both the Written Ministerial Statement (WMS) of 2015 and Planning Practice Guidance reported that local energy performance standards cannot be set above the equivalent of Code for Sustainable Homes Level 4. For this reason, the respondent considers the policy is not consistent with national policy. The initial Viability Assessment found that the 60- bed extra care typology would not be viable with 35% affordable housing, an 8% uplift for net zero operational emissions and £1 Ok/dwelling of other contributions, while the 30-bed sheltered typology would only be viable with values over £6,250/sqm. They consider that the policy requirement is therefore not justified by the evidence base and would not be effective. In the respondent's experience, the build cost uplift to net zero operational emissions exceeds 8% whilst on some sites, it is not possible to offset the energy balance with renewables due to insufficient roof space for PV. There is an unknown additional cost of new homes. This was not quantified in the Viability assessment, nor were any costs associated with embodied carbon. Respondent points out that in other locations in Essex there is an additional cost of between £3,000 and £4,000 per dwelling over and above the construction costs to meet Future Homes Standards and that these additional costs amount to £10,000 per dwelling compared to current Building Regulations. This cost burden has not been included in the Viability assessment. The aspirations go beyond current requirements and have financial and land take considerations that have not been fully assessed in the evidence base. As such, allocations to deliver the housing requirement at the bare minimum of need may become less viable or not deliver the quantum of development expected. As such, any policy should include 'where appropriate or possible to do so' to provide the necessary flexibility to ensure sites come forward. Without flexibility for situations where the delivering the policy requirement is not financially viable or technically feasible, the policy is also not effective. He The intention is that the policy will apply to all housing units regardless of value or tenure and will be a fundamental requirement for planning consent. Evidence work undertaken through the local plan on Viability testing, the proportion of affordable housing required in the housing policy and any marginal cost incurred to secure higher energy standards are in accord. Others welcome the policy provided there is no impact on level of affordable housing and that the tight energy standards are also applied to affordable housing . The additional cost of monitoring post construction must be factored into the viability assessments. The Government promotes SAP as the assessment tool and respondent suggests the policy should require the same, and not insist on the Passivhaus Planning Package or CIBSE TM54. The policy's detailed requirements must not make development unviable or unduly add additional cost to proposals that will also have to pay for other infrastructure requirements	The assertion that the CP22 policy is not compliant is disputed because there is evidence to suggest that the WMS is overridden by Climate Change legislation and other local plans have had energy policies adopted with the tighter standards that the Local Plan is proposing. The viability assessment will take into account more detailed factors at the Regulation 19 stage along with growing evidence from other research.
NDLP1326	Peter Lock						
NDLP1738	N/A						
NDLP2447	Anchor						
NDLP3425	Bloor Homes (Eastern)						
NDLP3459	Bloor Homes (Eastern)						
NDLP 3442	Bloor Homes (Eastern)						
NDLP3616	Hill Residential Ltd						

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						such as affordable housing , Section 106 obligations and/or CIL. .The requirement for renewable energy generation should acknowledge that some sites already have, or have planning approval for renewable energy production such the Stansted Airport planning permission for a 14.3 MW solar farm which at peak output will be capable of powering the whole airport and will be operational in 2024. It may not be possible for further provision to be made on-site and the policy should be amended to plan for circumstances where on-site renewable energy generation exists.	
NDLP1611 NDLP1584 NDLP3292 NDLP3816	Anglian Water David Perry Uttlesford Citizens Advice Uttlesford Citizens Advice				Support	Welcomes the policy approach and comments that it facilitates the energy component of water production and usage too. Suggests a comeback on developers who do not perform as per the permitted scheme design. The policy has co-benefits of energy efficiency and reduced costs, as well as improved health and well-being of residents, especially those on low incomes.	Noted. Policy will be retained and reviewed to ensure it is effective. The policy will require monitoring and the requirement to make good any underperformance and mismatch between the agreed specification and built form. . .
NDLP1105 NDLP1953 NDLP346	Theresa Trotzer Wilson Mr Loftus Buhagiar Mrs Jane Sharp				Transport	In a rural area it is difficult to reduce carbon emission where there has to be dependency on the car and bus services are relatively infrequent. There are no Active Travel proposals from Hatfield Broad Oak to nearest centres at Hatfield Heath and Takeley. With no footpaths and no brownfield land this makes it difficult in this rural area to achieve the low carbon strategy.	It is acknowledged that the local plan can only go so far in its policies and site development schemes to reduce carbon emissions, but the policies are designed to focus on areas that the planning system can control. Hence the spatial strategy and policies aim to encourage non-car use to reduce the need to travel and for larger schemes to have facilities to reduce the need to travel far particularly for everyday needs.
NDLP4035	MAG London Stansted Airport				Viability	The Warrington Local Plan Inspector's Report (October 2023) referencing both the Written Ministerial Statement (WMS) of 2015 and Planning Practice Guidance reported that local energy performance standards cannot be set above the equivalent of Code for Sustainable Homes Level 4. For this reason, the respondent considers the policy is not consistent with national policy. The initial Viability Assessment found that the 60- bed extra care typology would not be viable with 35% affordable housing, an 8% uplift for net zero operational emissions and £1 Ok/dwelling of other contributions, while the 30-bed sheltered typology would only be viable with values over £6,250/sqm. They consider that the policy requirement is therefore not justified by the evidence base and would not be effective. In the respondent's experience, the build cost uplift to net zero operational emissions exceeds 8% whilst on some sites, it is not possible to offset the energy balance with renewables due to insufficient roof space for PV. There is an unknown additional cost of new homes. This was not quantified in the Viability assessment, nor were any costs associated with embodied carbon. Respondent points out that in other locations in Essex there is an additional cost of between £3,000 and £4,000 per dwelling over and above the construction costs to meet Future Homes Standards and that these additional costs amount to £10,000 per dwelling compared to current Building Regulations. This cost burden has not been included in the Viability assessment. The aspirations go beyond current requirements and have financial and land take considerations that have not been fully assessed in the evidence base. As such, allocations to deliver the housing requirement at the bare minimum of need may	The assertion that the CP22 policy is not compliant is disputed because there is evidence to suggest that the WMS is overridden by Climate change legislation and other local plans have had energy policies adopted with the tighter standards that the Local Plan is proposing. The viability assessment will take into account more detailed factors at the Regulation 19 stage along with growing evidence from other research. The policy is required because it does require a higher standard of energy efficiency to reach the climate change goals and moreover create much greater energy efficient, comfortable and economic homes. It is not proposed to dilute the standards for energy and space heating.

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						become less viable or not deliver the quantum of development expected. As such, any policy should include 'where appropriate or possible to do so' to provide the necessary flexibility to ensure sites come forward. Without flexibility for situations where the delivering the policy requirement is not financially viable or technically feasible, the policy is also not effective. He The intention is that the policy will apply to all housing units regardless of value or tenure and will be a fundamental requirement for planning consent. Evidence work undertaken through the local plan on Viability testing, the proportion of affordable housing required in the housing policy and any marginal cost incurred to secure higher energy standards are in accord. Others welcome the policy provided there is no impact on level of affordable housing and that the tight energy standards are also applied to affordable housing . The additional cost of monitoring post construction must be factored into the viability assessments. The Government promotes SAP as the assessment tool and respondent suggests the policy should require the same, and not insist on the Passivhaus Planning Package or CIBSE TM54. The policy's detailed requirements must not make development unviable or unduly add additional cost to proposals that will also have to pay for other infrastructure requirements such as affordable housing , Section 106 obligations and/or CIL. .The requirement for renewable energy generation should acknowledge that some sites already have, or have planning approval for renewable energy production such the Stansted Airport planning permission for a 14.3 MW solar farm which at peak output will be capable of powering the whole airport and will be operational in 2024. It may not be possible for further provision to be made on-site and the policy should be amended to plan for circumstances where on-site renewable energy generation exists.	
NDLP1474	Environment Agency				Water and energy	The response cites research that has identified emissions in relation to water usage and treatment and suggests that the local plan includes words to reflect this in the supporting text for Core Policy 34, and/or for Core Policy 22, regarding energy for heating water in the home, water treatment and water demand management.	Review the supporting text to provide more context and reference evidence in the text.

Table 2 Core Policy 23: Overheating

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP1514	Natural England				Cooling	The role of Green Infrastructure in contributing to urban cooling through the provision of shade and evaporative cooling should be referenced in this policy.	The policy will be reviewed to address the role of urban cooling considerations including green infrastructure.
NDLP2739	Paula Griffiths				Implementation	Agrees with aims of the policy but considers that implementation of net zero requirements in the early years of the plan, especially for smaller developers will be difficult; a phased approach might be preferable especially for smaller developers or choice of wording to 'encourage' developers. The policy can only be addressed at detailed design stage. It cannot reasonably be addressed by outline planning applications and could be conditioned. Use of the CIBSE standards places an overreliance on one methodology for predicting overheating risk.	The clear policy inclination in Building Regulations and other required standards is strongly veering towards tighter energy, heating and water standards in accordance with the imperative to address climate change issues at a range of scales and circumstances. The net zero requirements have been subject to close evidential scrutiny and viability testing and are not considered onerous but are considered essential in the interests of cutting carbon.
NDLP3148	Smith Bros						
NDLP3831	Hillrise Homes Limited						
NDLP3945	Michael and Sarah Tee						
NDLP4065	Salacia Ltd						

NDLP4098	S Payne						
NDLP450	Kim Rickards	Planning Director Durkan Homes			Need for policy	Claims that the policy (and net zero operational carbon policy CP22) is unnecessary because it is covered by Building Regulations. Support the need for development to reduce its carbon emissions but the most effective way of achieving this is through building regulations. Together with policies on climate change (CP1, CP22, CP23, CP24) and water efficiency (CP34), considers that the planning system does not need to include additional policies for related technical standards, as it is being dealt with by Government through the Future Homes Standard and building regulations. Additional requirements are considered unnecessary and unjustified.	The net zero requirements have been subject to close evidential scrutiny and viability testing and are not considered onerous but are considered essential in the interests of cutting carbon to reach the national targets. Building Regulations cover overheating but not the details of design of a building. The requirements of policy CP22 are not covered by Building Regulations since they do not address energy intensity of use and space heating nor require air tightness.
NDLP518	Nigel Tedder	Managing Director New Homes Project Managements Limited	Nigel Tedder				
NDLP609	Natasha Styles	Group Planning Associate The Planning Bureau on behalf of McCarthy Stone	Natasha Styles				
NDLP3248	Weston Homes Plc						
NDLP980	Mary Power	Director Richstone Procurement Limited	Mary Power				
NDLP2004	Home Builders Federation				Policy standards	Recognises the need for developments to take into account overheating but questions the inclusion of specified standards. Suggests performance standards should be in the supporting text to Core Policy 1, providing further detail on the requirements for the Climate Change and Sustainability Statement.	The intention behind setting specific standards is to assist the implementation of the policy and to be able to measure its success. However, it is important to require the appropriate level of each performance criterion in policy and the standards required will be reviewed and checked against evidence.
NDLP3618	Hill Residential Ltd						
NDLP1005	Daniel Jones	Director Silverley Properties Ltd	Sophie Pain		Policy wording	Recognises the need for development to consider overheating but objects to the inclusion of specified standards which should be part of the supporting text to avoid confusion with two performance standards. The requirement should be phased in and/or reworded to 'encourage' rather than 'require'. Not all the requirements in this policy will apply in all cases and elements could be integrated with the core Climate Change policy.	The net zero requirements have been subject to close evidential scrutiny and viability testing and are not considered onerous but are considered essential in the interests of cutting carbon to reach the national targets. The clear policy inclination in Building Regulations and other required standards is strongly veering towards tighter energy, heating and water standards.
NDLP934	Catesby Estates Ltd (Stacey Rawlings)	Director Roebuck Land and Planning Ltd	Stacey Rawlings				
NDLP1623	Chelsteen Developments Limited						
NDLP3345	Welbeck Strategic Land						
					Support	Supports the policy because it will reduce the need for running expensive cooling systems, and lower costs and improve the health and wellbeing of residents, especially those on low incomes.	Noted and welcome the support.

Table 3 Core Policy 24: Embodied Carbon

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP355	Mrs Margaret Shaw				Materials	Supports the policy and states that all homes should be carbon negative in both their construction and their operation using building materials which have sequestered carbon as they grow like hemp; use geothermal foundations, insulated to minimise energy loss. The policy should give more weight to use of lower carbon building materials like hemp	The policy supports the comment which seeks to use building materials that encapsulate sequestered carbon, use renewable energy sources exporting excess to grid and ensuring buildings are as airtight as possible.
NDLP3791	Mr Neil Reeve						
NDLP2005	Home Builders Federation				Policy implementation	Respondent expresses concern over the status of research and knowledge in this field which underpins the policy. Concern that there is insufficient information and robust research to support consistent and effective assessment of embodied carbon in a development at this time for this policy to be effectively implemented. Suggests that the policy should 'encourage' development to reduce the level of embodied carbon but not require it to achieve a specific standard. Concerned that this policy may mean schemes are not viable and will not be implemented.	The local plan and its policies will be subject to detailed viability assessment and examination of ongoing research and accepted standards.
NDLP3373	Gladman						
NDLP3619	Hill Residential Ltd						
NDLP451	Kim Rickards	Planning Director Durkan Homes			Policy Soundness and Viability	Considers that the reduction in embodied carbon should be encouraged and not be a 'requirement' with a specific target since there is no nationally accepted standard. Claims that energy performance standards cannot be set above Building Regulations in accordance with an Inspector decision at the Warrington Local Plan and Written Ministerial Statement from 2015. Over the lifetime of the plan, the mandatory Building Regulations requirements will overtake this policy and render it obsolete. There is no need for additional standards because the Government provides this through the building regulations and Future Homes Standard. General support for the need for developments to reduce carbon emissions, but considers additional requirements are unnecessary and unjustified, and the most effective way of achieving this is through building regulations. The policy must be supported by a robust, credible evidence base and viability assessment of the implications for deliverability to meet the NPPF soundness test. Assertion that no evidence has been provided as to the practicality, deliverability and cost implications of the standards for embedded carbon. With no nationally set standard CP24 targets are based upon industry organisation (RIBA/LETI) rating systems where embodied carbon is an evolving field and hence the use of a target-based approach is inappropriate. Suggests as alternative policy wording to encourage development to reduce levels of embodied carbon. Alongside this, the viability assessment does not factor in any additional cost for achieving embodied carbon targets. Considers that the Council also need to verify that embodied carbon figures are available to developers from suppliers through an Environmental Product Declaration.	There is growing evidence for the need to reduce embodied carbon and growing research into the precise standards for products and materials. Growing expert consultants' evidence from other local planning authorities regarding local plan policy and Essex County Council including Kings' Counsel advice is leaning increasingly to underline the ability for local planning authorities to set higher carbon and energy targets provided this is evidenced. .
NDLP611	Natasha Styles	Group Planning Associate The Planning Bureau on behalf of McCarthy Stone	Natasha Styles				
NDLP2448	Anchor						
NDLP3116	Higgins Group						
NDLP3249	Weston Homes Plc						
NDLP3346	Welbeck Strategic Land						
NDLP3426	Bloor Homes (Eastern)						
NDLP3443	Bloor Homes (Eastern)						
NDLP3460	Bloor Homes (Eastern)						
NDLP2330	Mr Edward Gildea						
NDLP932	Catesby Estates Ltd	Director Roebuck	Stacey Rawlings		Policy wording and clarification	Concern by respondent, an expert in this field, that the process for commenting on climate change policy is not easy and is technical given all the processes of extraction, processing, modulating,	The suggestion regarding the Climate Change Sustainability Statement will be considered in order for

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP1066	(Stacey Rawlings)	Land and Planning Ltd	Sophie Pain			construction, transport etc. Need to clarify wording that suggests a carbon free building; re- consider because for embodied carbon this is not technically possible. No mention of end of life disposal, nor transport emissions, use of arable land, sequestration. Policy should apply to only those proposals that require a Climate Change and Sustainability Statement (CCSS) as required under Core Policy 1. Policy needs to be flexible to allow for changing standards over the duration of the local plan.	consistency between policies and their soundness in terms of how they are implemented and monitored.
NDLP1006	Richard Hughes Daniel Jones	Director Silverley Properties Ltd					
NDLP1612	Anglian Water				Support	Strong support for the policy requirement for whole life carbon assessments and the overall approach. The policy lends support to the organisation's own efforts in this respect.	Noted and check that the whole life aspects are properly addressed in the policy.
NDLP4066	Salacia Ltd				Targets	With no nationally set standard CP24 targets are based upon industry organisation (RIBA/LETI) rating systems where embodied carbon is an evolving field. LETI documents provide best practice and toolkits for reducing embodied carbon, but they acknowledge significant inconsistency regarding basic definitions in use with reference to carbon and net zero carbon terminologies over the life cycle of buildings and infrastructure with a significant lack of knowledge/skills in this area. Hence, with no agreed national methodology and lack of skills for calculating respondent feels it is not reasonable to require this in the policy for developers of largescale schemes.	Note these points. As more research is undertaken this policy will be reviewed and amended as appropriate as part of the Regulation 19 review of the Plan as a whole.

Table 4 Core Policy 25: Renewable Energy Infrastructure

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP1852B	Berden Parish Council				Agricultural Land	Reference in para 9.46 to highest grade agricultural land should be reconsidered and replaced, as in the policy, by 'best and most versatile agricultural land' as defined in the NPPF. Should clarify that the 'best and most versatile agricultural land' should not be used for standalone ground mounted installations.	Review and amend supporting text as necessary. Policy CP25(iii) covers protecting the most versatile agricultural land also.
NDLP2740	Paula Griffiths				Building design	Design life of a building should be referenced	The design life of a building is captured in the embodied carbon policy CP24. It is alluded to in CP25 which states inter alia that: "Proposals must include a scheme outlining how and when the site will be restored when energy production or equipment lifetime end."
NDLP3036	Chris Dodge				Heat networks	Policy does not mention heat networks using renewable energy which could provide renewable heat to both newer and older buildings, without significant retrofit. Notes that Grantchester Parish Council's feasibility study suggested potential viability for a heat network in the village. Suggests that the local plan could encourage heat networks to be part of the mix of technologies to transition to zero carbon.	This useful point is noted and further research into heat networks is needed to identify how the policy can apply to the re-use of older buildings and to parish/village community initiatives. The policy will be reviewed to explore how to incorporate this flexibility.
NDLP587 NDLP595	Mr John Burnham				Landscape	Uttlesford is one of the sunniest and least windy parts of East Anglia with attractive landscape though not of the value of National Parks. Solar will be more effective than turbines and the policy	Policy will be reviewed to consider merits of solar and strengthen support for solar energy initiatives subject to environmental impact in para 4.

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
	Mr John Burnham					should reflect this bias particularly given the visual impact of large wind turbines; ground mounted solar should be screened.	
NDLP649	John Howett	Director Roebuck Land and Planning Ltd			Policy wording	Support for policy but wording must ensure it is flexible and that there is guidance to help apply it during the development management and planning application process. Considers that the policy position and wording is weaker than it should be and should be amended to be mandatory rather than 'supportive' of solar installations, for example on supermarket roofs. Recommends that the last paragraph of the policy should be amended: "Proposals 'will' or 'must' be accompanied by an energy statement." Support for local and community generated energy should be more explicit and stronger. States that there is no mention of windfarms and geo-thermal energy	The policy does encourage windfarms subject to certain conditions regarding impact on amenity, noise, airport operation etc. Similarly, the mandatory nature of requirement for RE included in developments will come into play in conformity with the CP22 policy on achieving net zero carbon. This policy is focusing on RE and needs to balance the production of RE with any localised harm, and the national imperative to achieve decarbonisation. Renewable energy is the backbone to reducing carbon emissions from energy usage and largescale wind and solar are an integral part of the switch away from fossil fuels at the national level. On balance it is felt that the policy is sufficiently balanced between encouragement, support, conditional/safeguarding requirements and encouraging installation where all potential harms have less impact.
NDLP933	Catesby Estates Ltd (Stacey Rawlings)						
NDLP4023	Saffron Walden Town Council						
NDLP4038	MAG London Stansted Airport						
NDLP2331	Mr Edward Gildea						
NDLP165	Claire Russell				RE Capacity	Large capacity for Renewable Energy (RE) production has planning consent (e.g. Cutlers Green and Berden Hall) and if Council feels more is needed to power all homes (consultee considers all homes could now be RE supplied) then a Call for Sites for this purpose should be issued and Uttlesford should follow the example of other authorities in identifying sites suitable to do so. Considers that "Core Policy 25 does not comply with National Planning Policy in some key respects" for example, it should set out explicitly where the development will lead to less than substantial harm to the significance of a designated heritage asset. The policy should prioritise the incorporation of rooftop solar such as on the roofs of large buildings incorporating text in para 9.46 that supports solar farms especially in previously developed land. Policy ENV5 and S7 from the 2005 Plan should be retained. The Plan should strengthen the policy and use policies from other local plans such as policy S67 of the 2023 Central Lincolnshire Local Plan and Policy 7S of the 2020 Bedford Local Plan.	Policy will be reviewed and strengthened regarding RE provision and will have regard to other adopted local plans by way of supporting evidence.
NDLP2359	Richard Haynes				Solar energy	Objects to large scale solar installations that damage the environment and use quality agricultural land. Considers that the qualifying mitigation in the Policy is inadequate to protect from landscape, agricultural and other diverse impacts. Suggests there be no more such largescale solar development but that sites where harm can be minimised are identified e.g. in commercial areas and above car parks. Because the area is of high landscape quality and sunny there should be a preference for solar installations. Suggests the imposition of an area size limit for permitted solar farms. Calculation could be based on a calculation of the maximum area required to produce the total electricity required in Uttlesford bench marked at April 2023, and multiplied by a factor 2.5 to allow for the anticipated electricity demand growth over the Plan period with an offset to allow for electricity provided by roof mounted PV panels.	Renewable energy is the backbone to reducing carbon emissions from energy usage and largescale wind and solar are an integral part of the switch away from fossil fuels at the national level. It requires the integration of solar generation on all developments using roofs where practical, and encourages community-led schemes. On balance it is felt that the policy is sufficiently balanced between encouragement, support, conditional/safeguarding requirements and encouraging installation where all harms have less impact.
NDLP595	Mr John Burnham						
NDLP3792	Mr Neil Reeve						
NDLP1613	Anglian Water				Support	Strong support for the policy and welcomes the encouragement to the use of renewable energy and encourages a flexible approach that could apply to the organisation's operations. Requests that the Plan proactively encourages RE installations and suggests amendment to policy wording. Supports the strategy for new	Review the supporting text and detailed content of the policy to provide greater clarity over how applications can be more acceptable whilst achieving wider biodiversity aims
NDLP1585	David Perry						
NDLP1852A							

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP1798 NDLP2741	Berden Parish Council Littlebury Parish Council Paula Griffiths					development to integrate renewable energy technologies. Requests clarification over wording on cumulative impact such that planning applications involving renewable energy development will only be permitted where any adverse impacts (including cumulative impact) are avoided on each and any of the criteria specified in the policy Requests firm requirements for ground mounted solar PV installations to have regard for ecological and biodiversity delivery. Suggests ecological criteria to help support the planning application such as grass ways, ponds and hedge management for wildlife and native species. Queries powers available to the Council to deliver the climate change objectives.	
NDLP2857	Jeanette O'Brien				Solar permission	Comment arguing that development in Debden should be permitted due to increased windfall permissions and the agricultural land in the vicinity has been granted for permission for solar development, therefore why shouldn't Cutlers green get allocated housing.	The spatial strategy in the local plan is not based on previous renewable energy permissions as these were given on their individual merit, the local plan aims to allocate development based on their sustainability through the spatial strategy and core policy 2.

Table 5 Core Policy 26: Providing for Sustainable Transport and Connectivity

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP473	Sharon Critchley				A120 Corridor	It was stated that by proposing growth in the A120 corridor it is promoting road-based transport and will increase traffic and congestion especially along the B1256 and through Takeley. People were concerned about the proposals for the Flitch Way and whether the character of the route would be impacted. Comments have suggested that the employment sites on the B1256 should be located where there is better access to the strategic road network. People questioned whether the transport hub at Stansted Airport is achievable when taken in context of the proposed expansion plans at the airport.	The Council is content that Core Policy 13 highlights the sustainable transport and other transport measures that will be delivered within the South Uttlesford Area and the details regarding these interventions will be supported by the revised transport evidence to be produced prior to Reg. 19. Core Policy 26 clearly provides more detail on the measures required in relation to sustainable transport and the Council is content that the measures outlined will provide robust policy provision to deliver mode shift through the delivery of sustainable transport measures. The proposed employment sites are located adjacent the the A120 and strategic road network thus not requiring any access to existing settlements or local roads. Any employment development to the west of Takeley can access the M11 directly with potential for direct access to the A120 aswell. however, lorry movements to the east of the site through Takeley can be restricted.
NDLP3427 NDLP3444	Bloor Homes (Eastern) Bloor Homes (Eastern)				Bus services on strategic sites	One site promoter has suggested that strategic sites may require flexibility in the delivery of bus services and in some instances where a site is close to existing bus stops and services that there should not be a requirement to provide services through the strategic site.	The comments have been noted and the policy will be reviewed. Core Policy 26 provides more detail on the measures required in relation to sustainable transport and the Council is content that the measures outlined will provide robust policy provision to deliver mode shift through the delivery of sustainable transport measures. This policy is also supported by the individual Area Strategies which detail settlement specific sustainable transport interventions. The strategic sites have been allocated in the most sustainable locations which are close to services in existing top tier settlements, rail stations and/or regular bus services.

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
							The transport evidence will contain further detail to support and explain the rationale for the sustainable transport policies and measures in the Local Plan.
NDLP725	Kim Crow				Car sharing	It is suggested that car sharing could make a significant contribution towards the shift towards sustainable travel modes.	Noted. Car sharing is being considered within the sustainable travel plans being developed and the evidence that will inform the Reg 19 LP.
NDLP308 NDLP3037	Sally Taylor Chris Dodge	Councillor Birchanger Parish Council			Cycling and Sustainable Transport	<p>A number of comments have suggested that cycling proposals and the use of cycling as a form of transport is not realistic in Uttlesford. Another respondent suggested that cycling proposals need to be Uttlesford specific and may have to deviate from best practice or guidance due to the rural nature of the highway network.</p> <p>Respondents state there is a lack of availability of bus services in the area, where they are provided on new estates they often are using narrow estate roads. In order for the public transport proposals to work there needs to be increased frequency and residents require motivation to use PT. There should be space for bikes on buses. People have stated that there is no evidence that Stansted Airport can be used as a transport hub. Concerns that bus services are under threat and are not commercially viable. Should be more car parking at rail stations as bus services are poor. People suggest that more detail is required on proposals.</p> <p>Other respondents have stated that a lot of people have to travel further afield for their shopping needs. It was stated that the provision of a large secondary school at Takeley will have a impact on traffic and the nearby roads. School parking and drop offs is an issue in a number of towns and villages.</p>	The Council is content that Core Policies 7 & 13 highlight the active travel measures that will be delivered within the South Uttlesford Area and the details regarding these interventions will be supported by the revised transport evidence to be produced prior to Reg. 19. Core Policy 26 clearly provides more detail on the measures required in relation to sustainable transport and the Council is content that the measures outlined will provide robust policy provision to deliver mode shift through the delivery of sustainable transport measures. Core Policy 28 provides more detail on the measures that are required by development proposals to promote walking and cycling within development sites and to deliver improved facilities for walking and cycling to key services and destinations. The Reg. 19 iteration of the policy will be informed by up-to-date transport evidence in relation to walking and cycling.
NDLP763	Virginia Barlow				Flitch Way	A number of respondents support of upgrade of the Flitch Way to all weather use; however, any improvements need to ensure there are barriers to deter motorised vehicles. Conversely there were a number of respondents who suggested that the Flitch Way is unsuitable to be used as an active travel route as it is as dark and remote and any significant improvements would impact on wildlife. It was stated that it should be promoted as recreational route and not a utility route – a route along the B1256 would be better suited for active travel. Access across M11/J8 is a problem for connections into Bishops Stortford	Core Policy 26 clearly provides more detail on the measures required in relation to sustainable transport and the Council is content that the measures outlined will provide robust policy provision to deliver mode shift through the delivery of sustainable transport measures. Core Policy 28 provides more detail on the measures that are required by development proposals to promote walking and cycling within development sites and to deliver improved facilities for walking and cycling to key services and destinations. The South Area Strategy does contain a policy that considers the future upgrade of the Flitch Way. The Council is producing a Local Cycling and Walking Infrastructure Plan which will consider strategic connections.
NDLP593	Mr John Burnham				Future Technologies	Comments were made that policies should be aware of future transport technologies such as hydrogen powered vehicles and autonomous vehicles.	Comments have been noted and the policy wording will be reviewed.
NDLP1354	Sarah Eley				Great Dunmow	One respondent raised the issue of the bridge at Church End and whether an increase in traffic would make the area more busy and not safe to travel. They did accept that the traffic calming measures proposed would improve matters.	The Council will use the transport evidence base to review the impact of traffic on the local network at Church End. Development proposals in Great Dunmow will promote sustainable modes of transport and the promote the use of the strategic road network for car trips from the development sites. Localised highway interventions, including the Church End bridge, will be considered where there is a demonstratable impact linked to the local plan growth.

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP2655	East Herts District Council				HERT	The respondent stated that they would like to see specific reference to the Hertfordshire and Essex Rapid Transit (HERT)	The comments have been noted and the policy will be reviewed to consider whether the reference is appropriate.
NDLP4301	Hertfordshire County Council				Local Transport Plan	Respondent clarifying the key principles of the Hertfordshire Local Transport Plan (LTP4). - Transport User Hierarchy - Prioritising cycling and walking Also stating the need to strengthen sustainable travel between Uttlesford and Hertfordshire	Noted, Uttlesford support the principles stated and will work with ECC and other relevant bodies to ensure that sustainable travel modes are prioritised
NDLP2707	Pascale Muir				Impact on Heritage	Respondents have raised concerns regarding the impact of increased traffic and transport infrastructure on heritage assets such as conservation areas and Scheduled Ancient Monuments,	The Council is content that the approach is reasonable and proportionate in relation to the impact of transport on heritage assets. Furthermore, the development frameworks and further iterations will consider the impact of any transport infrastructure on heritage assets and their setting.
NDLP3793	Mr Neil Reeve				Impact on Protected Lanes	Respondents have raised concerns regarding the impact of increased traffic and transport infrastructure on heritage assets such as Protected Lanes and that these appear not to be considered in the plan.	The Council is content that the approach is reasonable and proportionate in relation to the impact of transport on heritage assets. The policy wording will be reviewed to consider the issue of protected lanes. It may be more appropriate in another policy area.
NDLP563	Ms Sarah Hodgson	secretary: FWAG, area representative and member: EBA, Flitch Way Action Group, Essex Bridleways Association, Uttlesford Resident			Infrastructure for all users	One respondent stated that transport infrastructure should cater for disabled users and equestrians.	The policy is an appropriate and proportionate response and will provide further policy provision to deliver mode shift through the delivery of sustainable transport measures for all users include those with mobility challenges and equestrians.
NDLP3671 NDLP3670	Newport Parish Council Newport Parish Council				M11/B1383 Corridor	A parish council has raised concerns regarding transport along the B1383 and the lack of connections from Newport to Stansted Airport by bus. It was suggested that there is a high volume of traffic along the B1383 and there needs to be consideration of a cycle route between Newport, Saffron Walden and Chesterford Research Park.	The Council is content that Core Policies 7 & 13 highlight the active travel measures that will be delivered within Uttlesford and the details regarding these interventions will be supported by the revised transport evidence to be produced prior to Reg. 19. Core Policy 26 clearly provides more detail on the measures required in relation to sustainable transport and the Council is content that the measures outlined will provide robust policy provision to deliver mode shift through the delivery of sustainable transport measures. Core Policy 28 provides more detail on the measures that are required by development proposals to promote walking and cycling within development sites and to deliver improved facilities for walking and cycling to key services and destinations. Development proposals will have to consider any location specific circumstances, for example, where development is proposed in rural locations. Further iterations of the policy will be informed by up-to-date transport evidence in relation to walking and cycling
NDLP4067 NDLP402	Salacia Ltd Louise Johnson				Policy clarifications and strengthening	Some respondents have suggested that there are areas within the policy that could be clarified, including, information on car clubs, the strengthening of transport facilities at the airport and explain which design code it is referencing – whether it is the UDC or ECC code. Further text should be added regarding working closely with parish and town councils as well as ECC. It was	The comments regarding policy clarification, terminology and strengthening of some areas has been noted and the policy will be reviewed to determine whether a minor revision is required.

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
		Parish Clerk Elsenham Parish Council				suggested that the policy should refer to the hierarchy of road users as described in the highway code. There is a suggestion that travel plans needs to be included and clarification of terms such as 'filtered permeability'.	
NDLP598 NDLP1188 NDLP2411 NDLP2607 NDLP3321 NDLP3581	Stephanie Gill Ashdon Parish Council Jane Gray Stebbing Parish Council The North West Essex Constituency Labour Party Ashdon Neighbourhood Plan Steering Group				Rural Connections	It was stated that there should be a clear focus on active travel with walking and cycling prioritised in development proposals. A number of the existing routes are poor quality, J8 is a significant barrier to active travel; active travel routes should have priority over car traffic. A number of respondents stated that they believe it is unlikely people will cycle long distances -they are likely to drive. Cycle routes need to be available all year and lit. E-bikes are not a realistic option – as the roads are in a poor state. It was stated that delivering LTN 1 /20 routes not possible in many areas. Sustainable connections in many villages are non existent.	The Council is content that Core Policies 7 & 13 highlight the active travel measures that will be delivered within Uttlesford and the details regarding these interventions will be supported by the revised transport evidence to be produced prior to Reg. 19. Core Policy 26 clearly provides more detail on the measures required in relation to sustainable transport and the Council is content that the measures outlined will provide robust policy provision to deliver mode shift through the delivery of sustainable transport measures. Core Policy 28 provides more detail on the measures that are required by development proposals to promote walking and cycling within development sites and to deliver improved facilities for walking and cycling to key services and destinations. Development proposals will have to consider any location specific circumstances, for example, where development is proposed in rural locations. Further iterations of the policy will be informed by up-to-date transport evidence in relation to walking and cycling.
NDLP1678	Essex Police	Planning Advisor Essex Police			Safety	The respondent states that policy should explicitly mention the need to reduce serious injuries and deaths and the 'Vision Zero' approach.	The comments regarding safety have been noted and the policy will be reviewed to determine whether a minor revision is required.
NDLP4117 NDLP4144	Siemens Benefits Scheme Limited Endurance Estates Land Promotion Ltd				Strategic allocations	A number of site promoter have raised objections to the strategic site allocations as they insist, they are not in the most sustainable location from a transport perspective. They state that their clients' sites are preferable from a sustainable transport perspective.	The comments have been noted. The Council is content that the proposed allocation are all in sustainable or highly sustainable locations that are capable of being made to be highly sustainable in accordance with national Policy. Core Policy 26 provides more detail on the measures required in relation to sustainable transport and the Council is content that the measures outlined will provide robust policy provision to deliver mode shift through the delivery of sustainable transport measures. This policy is also supported by the individual Area Strategies which detail settlement specific sustainable transport interventions. The strategic sites have been allocated in the most sustainable locations which are close to services in existing top tier settlements, rail stations and/or regular bus services. The transport evidence will contain further detail to support and explain the rationale for the sustainable transport policies and measures in the Local Plan. Policy wording and terminology will be reviewed. Further details on the site selection process can be found in the evidence and supporting documents.
NDLP235 NDLP356	Mr Roy Warren				Supportive	A number of respondents were supportive of the policy and in particular the health and physical well-being impact of the policy. There are a number of comments that support the aims of the policy and the aspiration to reduce the dependency on the car and encourage more sustainable transport including	Core Policy 26 provides more detail on the measures required in relation to sustainable transport and the Council is content that the measures outlined will provide robust policy provision to deliver mode shift through the delivery of

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NDLP546	Mrs Margaret Shaw					proposals for an enhanced transport hub at Stansted Airport. It was stated that sustainable transport enhancements benefit those on low incomes who may be more likely to use public transport and active travel modes. It was suggested that the policy should use terms such as expected should be used to give the policy more weight.	sustainable transport measures. This policy is also supported by the individual Area Strategies which detail settlement specific sustainable transport interventions.
NDLP696	Desiree Ashton					Respondents stated that the policy should include the concept walkable neighbourhoods.	The strategic sites have been allocated in the most sustainable locations which are close to services in existing top tier settlements, rail stations and/or regular bus services.
NDLP1518	Nigel Wood					It was also suggested that lighting requirements need to consider the impact on wildlife and habitats.	The transport evidence will contain further detail to support and explain the rationale for the sustainable transport policies and measures in the Local Plan. Policy wording and terminology will be reviewed.
NDLP1685	Natural England						
NDLP1698							
NDLP2391	Essex Police						
NDLP2396	Essex Police						
NDLP3294	National Highways						
NDLP3374	National Highways						
NDLP3461	Uttlesford Citizens Advice						
NDLP3818	Gladman						
	Bloor Homes (Eastern)						
	Uttlesford Citizens Advice						
NDLP348	Jane Sharp				Sustainable Transport - General	There are a number of comments that support the aims of the policy and the aspiration to reduce the dependency on the car and encourage more sustainable transport including proposals for an enhanced transport hub at Stansted Airport.	Core Policy 26 provides more detail on the measures required in relation to sustainable transport and the Council is content that the measures outlined will provide robust policy provision to deliver mode shift through the delivery of sustainable transport measures. This policy is also supported by the individual Area Strategies which detail settlement specific sustainable transport interventions.
NDLP343	Janis Keith					Respondents state there is a lack of availability of bus services in the area, where they are provided on new estates they often are using narrow estate roads. In order for the public transport proposals to work there needs to be increased frequency and residents require motivation to use PT. There should be space for bikes on buses. People have stated that there is no evidence that Stansted Airport can be used as a transport hub. Concerns that bus services are under threat and are not commercially viable. Should be more car parking at rail stations as bus services are poor. More detail is required on proposals. People have asked what is a mobility hub/transport hub?	The strategic sites have been allocated in the most sustainable locations which are close to services in existing top tier settlements, rail stations and/or regular bus services.
NDLP1060	Lisa Fuller					Some respondents questioned the sustainability of the sites because of their location – not near rail links ?	The transport evidence will contain further detail to support and explain the rationale for the sustainable transport policies and measures in the Local Plan.
NDLP1095	Alison Cummings					It was stated that many people commute to London in cars or travel to other stations out of the district.	
NDLP1226	Mr Richard Walford						
NDLP1956	Mr Loftus Buhagiar						
NDLP1957	Mr Loftus Buhagiar						
NDLP1958	Mr Loftus Buhagiar						

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP1959	Mr Loftus Buhagiar						
NDLP1960	Mr Loftus Buhagiar						
NDLP1961	Mr Loftus Buhagiar						
NDLP1962	Mr Loftus Buhagiar						
NDLP1963	Mr Loftus Buhagiar						
NDLP1645	Alison Keene						
NDLP2332	Mr Edward Gildea						
NDLP2712	S Luck						
NDLP2766	Mrs Isobel Grayson						
NDLP2855	Jeanette O'Brien						
NDLP2890							
NDLP1174	Keith Exford						
	Bob Goldsmith						

Table 6 Core Policy 27: Assessing for impact of Development on Transport Infrastructure

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP474	Mr Bill Critchley				A120 Corridor	It was stated that by proposing growth in the A120 corridor it is promoting road based transport and will increase carbon emissions. Respondent states that they believe the approach to the spatial strategy promotes car usage as development is predominantly proposed in the A120 corridor.	Core Policy 27 provides the policy for which developers are expected to undertake a number of assessment processes in order to consider the impact of development proposals on transport infrastructure including the submission of Travel Assessments, Travel Statements and, where required, a Travel Plan. Development proposals will be expected to propose measures that improve sustainable transport and deliver highway schemes that are appropriate. The policy is an appropriate and proportionate response and will provide further policy provision to deliver mode shift through the delivery of sustainable transport
NDLP1742	Salings Parish Council						

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							measures. Such measures will include schemes along the A120 corridor. The A120 corridor provides some of the best opportunities for supporting sustainable travel with existing and opportunities for improved cycling and bus connections - a sustainable transport hub between Takeley and Great Dunmow and good proximity to a range of employment sites, for example.
NDLP1679 NDLP1694	Planning Advisor Essex Police Planning Advisor Essex Police				Emergency Access & safety	One respondent stated that the policy needs to address the requirements of emergency vehicles and ensure that infrastructure can accommodate emergency service vehicles. The respondent also states that policy should explicitly mention the need to reduce serious injuries and deaths and the 'Vision Zero' approach.	Core Policy 27 provides the policy for which developers are expected to undertake a number of assessment processes in order to consider the impact of development proposals on transport infrastructure including the submission of Travel Assessments, Travel Statements and, where required, a Travel Plan. The comments regarding safety and emergency access have been noted and the policy will be reviewed to determine whether a minor revision is required.
NDLP2394	National Highways				Impact on National Highways Infrastructure	It was stated that development in Gt. Dunmow will have a detrimental impact on the transport infrastructure in Gt.Dunmow that is already under pressure with the road network that is considered unsuitable. Other respondents have stated that the active travel proposal in the strategic allocation are insufficient.	Core Policy 27 provides the policy for which developers are expected to undertake a number of assessment processes in order to consider the impact of development proposals on transport infrastructure including the submission of Travel Assessments, Travel Statements and, where required, a Travel Plan. Development proposals will be expected to propose measures that deliver highway schemes that are appropriate for the uses expected including HGV's. The delivery of HGV driver facilities may be a consideration for the Freight Policy: Core Policy 32. The comments regarding drainage have been noted and the policy will be reviewed.
NDLP567	Ms Sarah Hodgson	Secretary: FWAG, area representative and member: EBA, Flich Way Action Group, Essex Bridleways Association, Uttlesford Resident (the form doesn't allow me to submit comments both on behalf of an organisation and as an individual)			Infrastructure for all users	One respondent states that transport infrastructure should cater for disabled users and equestrians.	Core Policy 27 provides the policy for which developers are expected to undertake a number of assessment processes in order to consider the impact of development proposals on transport infrastructure including the submission of Travel Assessments, Travel Statements and, where required, a Travel Plan. Development proposals will be expected to propose measures that improve sustainable transport and deliver highway schemes that are appropriate. The policy is an appropriate and proportionate response and will provide further policy provision to deliver mode shift through the delivery of sustainable transport measures for all users include those with mobility challenges and equestrians.
NDLP3254 NDLP3620 NDLP4028	Weston Homes Plc Hill Residential Ltd				Policy clarification	Respondents have stated that the reference to Transport Related Carbon Emissions Quantification Statement is not consistent with the NPPF. Other respondents have suggested word additions to improve the policy and where there are some typo's in the document.	Core Policy 27 provides the policy for which developers are expected to undertake a number of assessment processes in order to consider the impact of development proposals on transport infrastructure including the submission of Travel Assessments, Travel Statements and, where required, a Travel Plan. The wording suggested and clarification required has been noted and the policy will be reviewed to determine whether a minor revision is required.

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP4068	Saffron Walden Town Council Salacia Ltd						
NDLP1964	Mr Loftus Buhagiar				Providing Access to services	It was stated that transport proposals need to focus on providing links to services such as shops and schools.	Core Policy 27 provides the policy for which developers are expected to undertake a number of assessment processes in order to consider the impact of development proposals on transport infrastructure including the submission of Travel Assessments, Travel Statements and, where required, a Travel Plan. Development proposals will be expected to propose measures that improve sustainable transport and deliver highway schemes that are appropriate. The policy is an appropriate and proportionate response and will provide further policy provision to deliver mode shift through the delivery of sustainable transport measures.
NDLP681 NDLP1725 NDLP2226 NDLP2227 NDLP2228 NDLP2915	Mr Frank Woods High Roding Parish Council N/A N/A N/A Christine Chester	Clerk Hatfield Broad Oak Parish Council Clerk Hatfield Broad Oak Parish Council Clerk Hatfield Broad Oak Parish Council			Rural Transport	A number of respondents have raised concerns that bus services are limited or non-existent in rural areas and provision should be made to provide more services in rural areas. Respondents have stated that in rural areas residents are dependent on the car and therefore road infrastructure should be improved in these locations to take account of the predominant form of transport. Other respondents have mention that there are no pavements or street lights in rural areas.	Core Policy 27 provides the policy for which developers are expected to undertake a number of assessment processes in order to consider the impact of development proposals on transport infrastructure including the submission of Travel Assessments, Travel Statements and, where required, a Travel Plan. Development proposals will be expected to propose measures that improve sustainable transport and deliver highway schemes that are appropriate. The policy is an appropriate and proportionate response and will provide further policy provision to deliver mode shift through the delivery of sustainable transport measures. Development proposals will have to consider any location specific circumstances, for example, where development is proposed in rural locations. The Spatial Strategy directs the majority of growth to the most sustainable settlements with a much smaller proportion at the larger and most sustainable villages in order to contribute to their vitality and viability and this will include helping to make public transport options more viable - but the Spatial Strategy also restricts development in smaller and less sustainable rural locations. Overall, this is a balanced approach that supports sustainable development and is consistent with national policy.
NDLP896	Allison Ward	Parish Clerk Great Canfield Parish Council			Transport Assessments and Travel Plans	Transport assessment should consider the needs of school children from rural areas who need to travel to school. Similarly, policies should take into account the needs of those who have to commute by car.	Core Policy 27 provides the policy for which developers are expected to undertake a number of assessment processes in order to consider the impact of development proposals on transport infrastructure including the submission of Travel Assessments, Travel Statements and, where required, a Travel Plan. Development proposals will be expected to propose measures that improve sustainable transport and deliver highway schemes that are appropriate. The policy is an appropriate and proportionate response and will provide further policy provision to deliver mode shift through the delivery of sustainable transport measures. Development proposals and Transport Assessments will have to take into account any location specific circumstances, for example, where development is proposed in rural locations. The Spatial Strategy seeks to locate schools in the most sustainable locations with the

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
							most opportunities for supporting the most sustainable approach to travel.
NDLP1315	John Mirams				Transport Evidence	It was stated that there was insufficient evidence to justify the impact of development in places such as Thaxted.	Core Policy 27 provides the policy for which developers are expected to undertake a number of assessment processes in order to consider the impact of development proposals on transport infrastructure including the submission of Travel Assessments, Travel Statements and, where required, a Travel Plan. Development proposals will be expected to propose measures that improve sustainable transport and deliver highway schemes that are appropriate. The policy is an appropriate and proportionate response and will provide further policy provision to deliver mode shift through the delivery of sustainable transport measures. Development proposals and Transport Assessments will have to take into account any location specific circumstances, for example, where development is proposed in rural locations. The Spatial Strategy seeks to locate schools in the most sustainable locations with the most opportunities for supporting the most sustainable approach to travel.

Table 7 Core Policy 28: Active Travel - Walking and Cycling

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP2333	Mr Edward Gildea				Flitch Way	One respondent stated that the Flitch Way should provide a link to Bishops Stortford including a cycle and pedestrian crossing of the M11.	Core Policy 26 clearly provides more detail on the measures required in relation to sustainable transport and the Council is content that the measures outlined will provide robust policy provision to deliver mode shift through the delivery of sustainable transport measures. Core Policy 28 provides more detail on the measures that are required by development proposals to promote walking and cycling within development sites and to deliver improved facilities for walking and cycling to key services and destinations. The South Area Strategy does contain a policy that considers the future upgrade of the Flitch Way. The Council is producing a Local Cycling and Walking Infrastructure Plan which will consider strategic connections.
NDLP476 NDLP601 NDLP697 NDLP1104 NDLP1699 NDLP1911	Mr Bill Critchley Stephanie Gill Nigel Wood Theresa Trotzer Wilson N/A	 Planning Advisor Essex Police			General	It was stated that there should be a clear focus on active travel with walking and cycling prioritised in development proposals. Whilst some stated that proposals are not ambitious enough. A number of respondents suggested the need for direct active travel routes with onward improvement to routes to key locations. It was re-iterated that there needs to be active travel connections to the airport. A number of the existing routes are poor quality, J8 is a significant barrier to active travel; active travel routes should have priority over car traffic. A number of respondents support the use of e-bikes, needs to be dedicated cycle parking, all routes should use the highest design specification, unlikely people will cycle long distances -they are likely to drive. Cycle routes need to be available all year and lit. E-bikes are not a realistic option – as the roads are in a poor state. It was stated that delivering LTN 1 /20 routes not possible in many areas. Sustainable connections to rail stations are required.	Core Policy 26 clearly provides more detail on the measures required in relation to sustainable transport and the Council is content that the measures outlined will provide robust policy provision to deliver mode shift through the delivery of sustainable transport measures. Core Policy 28 provides more detail on the measures that are required by development proposals to promote walking and cycling within development sites and to deliver improved facilities for walking and cycling to key services and destinations. The Reg. 19 iteration of the policy will be informed by up-to-date transport evidence in relation to walking and cycling.

[illegible]

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
		Bridleways Association					
NDLP2449	Anchor				Policy Compliance	It was stated by one respondent that the policy is not consistent with the NPPF.	Core Policy 26 clearly provides more detail on the measures required in relation to sustainable transport and the Council is content that the measures outlined will provide robust policy provision to deliver mode shift through the delivery of sustainable transport measures. Core Policy 28 provides more detail on the measures that are required by development proposals to promote walking and cycling within development sites and to deliver improved facilities for walking and cycling to key services and destinations. The NPPF is clear that development proposals should promote sustainable transport and that opportunities for walking and cycling are pursued. Furthermore, development proposals should give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas. The policy is consistent with the NPPF and national guidance and policy on active travel.
NDLP4031 NDLP4034 NDLP4069 NDLP735	Saffron Walden Town Council Saffron Walden Town Council Salacia Ltd Mr Martin Crisp	 Bridleways Development Officer Essex Bridleways Association			Public Rights of Way	A number of respondents have stated that PROW including unregistered paths should be considered in the policy and that the needs of equestrians is overlooked in the active travel policy approach.	Core Policy 30 requires development proposals to consider the requirement to protect and enhance the public rights of way network. The comments have been noted and the policy will be reviewed to determine whether a revision is required.
NDLP1187 NDLP2217 NDLP2218 NDLP3582 NDLP3672	Ashdon Parish Council N/A N/A Ashdon Neighbourhood Plan Steering Newport Parish Council	Clerk Hatfield Broad Oak Parish Council Clerk Hatfield Broad Oak Parish Council Newport Parish Council			Rural Connections	It was stated that there should be a clear focus on active travel with walking and cycling prioritised in development proposals. Whilst some stated that proposals are not ambitious enough. A number of respondents suggested the need for direct active travel routes with onward improvement to routes to key locations. It was re-iterated that there needs to be active travel connections to the airport. A number of the existing routes are poor quality, J8 is a significant barrier to active travel; active travel routes should have priority over car traffic. A number of respondents support the use of e-bikes, needs to be dedicated cycle parking, all routes should use the highest design specification, unlikely people will cycle long distances -they are likely to drive. Cycle routes need to be available all year and lit. E-bikes are not a realistic option – as the roads are in a poor state. It was stated that delivering LTN 1 /20 routes not possible in many areas. Sustainable connections to rail stations are required. Respondents have raised concerns that it is not possible to deliver active travel connections in rural areas.	Core Policy 26 clearly provides more detail on the measures required in relation to sustainable transport and the Council is content that the measures outlined will provide robust policy provision to deliver mode shift through the delivery of sustainable transport measures. Core Policy 28 provides more detail on the measures that are required by development proposals to promote walking and cycling within development sites and to deliver improved facilities for walking and cycling to key services and destinations. The Reg. 19 iteration of the policy will be informed by up-to-date transport evidence in relation to walking and cycling. Development proposals will have to consider any location specific circumstances, for example, where development is proposed in rural locations and how active travel solutions will be delivered in such locations.
NDLP1686	N/A	Planning Advisor Essex Police			Safety and Security	It was stated that there should be a clear focus on active travel with walking and cycling prioritised in development proposals. Whilst some stated that proposals are not ambitious enough. A number of respondents suggested the need for direct active travel routes with onward improvement to routes to key	Core Policy 26 clearly provides more detail on the measures required in relation to sustainable transport and the Council is content that the measures outlined will provide robust policy provision to deliver mode shift through

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
						locations. It was re-iterated that there needs to be active travel connections to the airport. A number of the existing routes are poor quality, J8 is a significant barrier to active travel; active travel routes should have priority over car traffic. A number of respondents support the use of e-bikes, needs to be dedicated cycle parking, all routes should use the highest design specification, unlikely people will cycle long distances -they are likely to drive. Cycle routes need to be available all year and lit. E-bikes are not a realistic option – as the roads are in a poor state. It was stated that delivering LTN 1 /20 routes not possible in many areas. Sustainable connections to rail stations are required. It was stated that cycle parking should be safe and secure and active travel routes should prioritise safety.	the delivery of sustainable transport measures. Core Policy 28 provides more detail on the measures that are required by development proposals to promote walking and cycling within development sites and to deliver improved facilities for walking and cycling to key services and destinations. The Reg. 19 iteration of the policy will be informed by up-to-date transport evidence in relation to walking and cycling. The comments regarding safety on the transport network and secure cycle parking have been noted and the policy will be reviewed to determine whether a minor revision is required.
NDLP1303	Maureen Norman				Walking routes and Public Rights of Way (PROW)	Request that the north-south route along the B1383 between Stansted Mountfitchet and Great Chesterford including links to the railway station be improved for cyclists and pedestrians	Improvements to the highways can be required as part of planning consents if necessary and are the responsibility of the County as Highway Authority.
NDLP402	Louise Johnson	Parish Clerk Elsenham Parish Council			Wording clarification	It was suggested that a translation is needed for 'filtered permeability'.	The policy wording will be reviewed.

Table 8 Core Policy 29: Electric and Low Emission Vehicles

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP2533 NDLP3253 NDLP2395 NDLP3093	Gillian Mulley Weston Homes Plc National Highways Segro				Charging point requirements	Concerns have been raised about the number of charging points that will be provided. There is no indication of quantum and specification of charging points, or requirements that need to be provided to work for different end users (fast charging, overnight charging etc.). Concerns over the limitations of charging points including vehicles requiring longer to re-charge than traditional methods, the transition of traditional parking bays to charging stations, offering accessible payment options for charging stations and provisions to accommodate these limitations. The policy does not accommodate any flexibility or consideration to charging / plug in points on a site-by-site basis, as the maximum provision is requested in all instances. A pragmatic approach should be taken in regard to the type of charging point required.	The Council can provide further detail on the charging points requirements, quantum and specifications. Core policy 29 can be updated to explain how the limitations of charging methods will be addressed and / or overcome. Core Policy 29 notes that 'The design and operation of such infrastructure should follow best practice so that their operation does not undermine the quality of the public realm.'. The intention is that sites will be considered on a site-by-site basis.

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP452 NDLP3621 NDLP4070 NDLP309	Kim Rickards Hill Residential Ltd Salacia Ltd Sally Taylor	Planning Director Durkan Homes Councillor Birchanger Parish Council			Policy Wording	The policy is unnecessary as the requirement to provide charging for electric and low emission vehicles for each dwelling is already set out in the Building Regulations. Essex County Council is working on a county wide policy for the installation of EV charging points, and this should be incorporated or referenced within the plan. Also concerns that the policy is vague.	Noted and will update the policy to ensure that it does not duplicate Building Regulations. Consideration will be given to ensuring the policy provides sufficient clarity.
NDLP3118	Higgins Group				Supportive	Generally supportive of the policy and committed to providing EV infrastructure.	Noted.
NDLP4033	Saffron Walden Town Council				Typo	Appendix 1 (page 2) incorrectly refers to core policy 29 as active travel walking and cycling - Amend accordingly Will amend accordingly.	Will amend accordingly.
NDLP1687	Essex Police	Planning Advisor Essex Police			Security	The safety and security associated with EV chargers should be considered. The policy wording will be reviewed.	The policy wording will be reviewed.
NDLP2006	Home Builders Federation				Building Regs	The Policy needs to go above Building Regs - if it is to be included, otherwise it should be deleted. The policy will be reviewed against the Building Regulation requirements.	The policy will be reviewed against the Building Regulation requirements.

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP205	Mr Richard Gilyead				Quantum	Concerns have been raised about the number of charging points that will be provided. There is no indication of quantum and specification of charging points, or requirements that need to be provided to work for different end users (fast charging, overnight charging etc.)	The Council can provide further detail on the charging points requirements, quantum and specifications.

Table 9 Core Policy 30: Public Rights of Way

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP3673	Newport Parish Council	Newport Parish Council			Additional PRoW	Current proposals do not propose any additional PROW other than those within the developments or the one proposed to go over, or under, the M11 motorway.	The Local Plan policies are used to inform decision making on planning applications - the policy is designed to inform how planning applications should consider PROW existing and/ or new. It is not the function of the Local Plan to promote new PROW per se, other than in relation to proposed development allocations. However, the green and blue infrastructure strategy as supported by Core Policies 9, 15, 18 does contribute to some enhancements.
NDLP312	Sally Taylor	Councillor Birchanger Parish Council			Damage and maintenance	Concerns were raised about the lack of maintenance causing deterioration and loss of access to PRoW. Concerns raised about electric cars/bikes/scooters. They pose a higher fire risk and electric cars - due to their heavier weight - cause greater damage to roads, which consumes more resources to repair.	Noted. However, road maintenance is a matter for the Highway Authority, Essex County Council.
NDLP2039	Douglas Kent						
NDLP573	Ms Sarah Hodgson	Secretary: FWAG, area representative and member: EBA, Flitch Way Action Group, Essex Bridleways Association, Uttlesford Resident (the form doesn't allow me to submit comments both on behalf of an organisation and as an individual.			Flitch Way	It was recommended to reconnect the missing links of the Flitch Way through Dunmow and into Bishop's Stortford and provide safe link routes from neighbouring settlements so as to create a continuous 15 mile off road route for everyone to share and enjoy.	The Flitch Way upgrade is covered in Core Policies 13 and 14.
NDLP402	Louise Johnson	Parish Clerk Elsenham Parish Council			Implementation	It is stated at 9.88 that 'The Council will ensure that Rights of Way are protected, enhanced, and promoted'. The comment questions how this will be achieved as it is pointed out that PROW are the responsibility of ECC.	The comment at 9.88 is intended to relate to the operation of CP30 which relates to how PROW may be impacted by development proposals. The paragraph can be clarified in this regard.
NDLP228	Mr Richard Gilyead				Protected lanes	Residents asked if there should be a separate policy for protected lanes or if the 2012 protected lanes report should be referenced.	This will be considered as part of the assessment of the heritage policies in Reg.19 Local Plan.

NDLP742	Mr Martin Crisp	Bridleways Development Officer Essex Bridleways Association			S106 / Developer contributions	Developers' obligations should be a key part of all new developments as should the provision of parks accessible to all: walkers, cyclists, equestrians and wheelchair users. A requirement should be embedded within each of the development Policies for the land allocations where this link will run that a S106 agreement is imposed on the developer for a fully-funded multi-user route across all relevant sites.	Core Policy 5 requires all new developments to provide the necessary on-site and, where appropriate, off site-infrastructure. These will be sought through the negotiation of planning obligations, conditions, levy, agreements as secured through the planning permission.
NDLP831	Valdis Belinis						
NDLP1027	Louise Howles				Saffron Trail	The Saffron Trail is not mentioned anywhere. It should be recognized, and its setting protected from the impact of new development in Policies in Chapter 6 and Chapter 5.	Saffron Trail will be referenced in supporting text.
NDLP4071	Salacia Ltd				Supportive	No objective to the policy.	Support noted.

Table 10 Core Policy 31: Parking Standards

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP920	Linda Steer				Enforcement	The response makes reference to a recent application for 66 bed care home that was approved which did not meet ECC Parking Standards. It is suggested that indicates a lack of adherence to the parking standards.	Local Plan policies will be used to inform decision making on planning applications, but there may be circumstances where the site-specific details of a particular application justify some level of deviation to policies, where this is acceptable to the range of relevant stakeholders. Ultimately, it is important the Local Plan includes policies that are robust and up-to-date and provide the most effective basis for decision making possible.
NDLP407	Mr Bill Critchley				Gilders Road / Saffron Way	Views of residents parking on Gilders Road and Saffron Way, making access by emergency vehicles and buses challenging. Your plans are proposing to open access to the new estate, via these roads.	The South Area Strategy and the Takeley development policy, together with the Design Guide, will set out the approach to street hierarchies and how parking should be integrated into development proposals without impacting on pedestrian and active travel movements. Active travel corridors will be prioritised in development proposals.
NDLP404 NDLP1965	Mr Bill Critchley Mr Loftus Buhagiar				On-street parking	Concerns that inadequate parking provision will further add to the congestion and parking issues. No link between on-street parking being a barrier for some forms of active travel and ways to address this. The impact of visitor parking must be assessed ensuring that parking is adequate.	The area strategies and the site development policies, together with the Design Guide, will set out the approach to street hierarchies and how parking should be integrated into development proposals. Active travel corridors will be prioritised in development proposals.

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP849	Linda Steer				Outdated guidance	ECC Parking Standards are dated 2009 (on their website) and so are out of date and out of line with current social and residential circumstances. Notably ECC is carrying out a parking guidance consultation (closing 04.12.2023) will the new guidance be adopted.	Core Policy 31 will be reviewed in light on any new evidence which comes from the ECC parking guidance consultation.
NDLP1688		Planning Advisor Essex Police			Park Mark	Park Mark model should be implemented to prevent crime.	Consideration will be given to making reference to Park Mark in relation to CP31.
NDLP875	Mr Neil Hargreaves				Policy Wording	A number of comments are received relating to policy which include: there are contradictions between Essex County Council's standards and the NPPF approach around parking standards of commercial development; and the Uttlesford Design Code is yet to be adopted and the standards are suggested as 'minimum and maximum' standards, which is unclear to the reader specifically when each typology indicates 'x' number of spaces per dwelling, not a range.	Noted. Consideration will be given to updating the policy where appropriate and the standards in the design code will be clarified before it is adopted.
NDLP4036	Saffron Walden Town Council						
NDLP4072							
NDLP402	Salacia Ltd Louise Johnson	Parish Clerk Elsenham Parish Council					

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP405 NDLP406	Mr Bill Critchley Mr Bill Critchley				Priors Green	Several comments about congestion caused by parked vehicles around the Priors Green Estate and other new estates and the impact this has, making road crossing dangerous and restricting access for buses and emergency vehicles.	The South Area Strategy and the Takeley development policy, together with the Design Guide, will set out the approach to street hierarchies and how parking should be integrated into development proposals without impacting on pedestrian and active travel movements. Active travel corridors will be prioritised in development proposals.

Table 11 Core Policy 32: The Movement and Management of Freight

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP3094	Segro				Clarity on requirements for Freight Management Strategy	Questions were raised about the reference to a 'significant number'. This is a broad trigger, meaning that it is open to interpretation. Does a Freight Management Strategy need to be a standalone document or could this be provided within the Transport Assessment / Travel Plan process.	The Council will clarify the meaning of 'significant number' and provide a specific trigger for requirement of a Freight Management Strategy.
NDLP2742	Paula Griffiths				Delivery times	Delivery times in Saffron Walden High Street were considered a key issue. Thaxted is particularly badly affected by lorries trying to make the sharp turn just near the church.	Core Policy 32 included proposals to address local and town based impacts of freight and the policy approach for the Reg.19 Plan will consider whether further localised measures are required.
NDLP1689	Essex Police	Planning Advisor Essex Police			Essex Police - Crime Prevention	Essex Police would encourage consultations to discuss proposals to mitigate freight crime. If designing formal Freight parking, Essex Police would advocate 'Park Mark Freight' which introduces specific criteria such as (but not limited to) a secure perimeter, on-site security personnel, uniformed lighting, CCTV, and signage containing emergency contacts telephone help line etc.	Noted. The Council will consider amending the policy and continue to engage with Essex Police when designing Freight parking.
NDLP4037	Saffron Walden Town Council				Policy Wording	Concerns raised that paragraph 9.98 is not clear enough.	Will clarify supporting text to explain who 'other partners' are and that local delivery hubs will be encouraged.

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP894	Allison Ward	Parish Clerk Great Canfield Parish Council			Rural Roads	Concerns have been raised about rural lanes which are not suitable for large vehicles. It is suggested the word 'minimise' is replaced with 'avoid' in this policy. Freight management strategies should ensure the prioritisation of the use of the Strategic Road Network and minimise the use of the rural network.	The wording of Core Policy 32 can be strengthened to discourage freight movement on the rural network.
NDLP402	Louise Johnson	Parish Clerk Elsenham Parish Council					
NDLP4039	MAG London Stansted Airport				Stansted Airport	The policy does not speak about the importance of Stansted Airport for the movement of freight internationally as well as within the District. The policy should be expanded to cover the link between road freight movements and air movements departing from or arriving to Stansted Airport.	Can update Core Policy 32 to include the importance of Stansted Airport.

Table 12 Core Policy 33: Managing Waste

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP4040	MAG London Stansted Airport				Aviation	London Stansted Airport welcome policy CP33, but wish to highlight the importance of considering the potential impact of aviation safety when assessing planning applications relating to waste and development. Aviation safety must be addressed in the determination of the planning application and the Airport would need to be consulted. CP33 should include a further criterion which refers to the need to consider the impact on aviation and cross refer to the standalone airport safeguarding policy.	Noted. Reference to Airport Safeguarding will be added to the Policy.
NDLP1471	Environment Agency				Contamination	The comment suggests that contamination/ remediation is not included in CP33 and recommends reference to the potential for excavated materials recovered on site via treatment being capable of re-use on site under the Definition of Waste Development Industry Code of Practice.	Noted. note that CP42 addresses matters relating to pollution and contamination.
NDLP1828	Essex County Council				ECC Requirements	ECC recommend that the individual site policies reference the need for Mineral Resource Assessment, Minerals Infrastructure Impact Assessment and/ or Waste Infrastructure Impact Assessments to be undertaken. This will ensure that any mineral resource is not sterilised prior to extraction and to avoid future operations of waste and mineral infrastructure not being compromised. ECC also recommend that the Policies Map is updated to reflect the relevant mineral mapping layers. ECC welcomes reference to the Minerals Local Plan and the Waste Local Plan. It is suggested that consideration could be given to the early work to inform an updated Minerals Waste Plan to be published for Reg 18 consultation in early 2024.	Noted. The Minerals and Waste Team at ECC have indicated that the Reg 19 for the emerging Minerals Local Plan will not be published until later in 2025, after the submission date for the Uttlesford Local Plan. It has been suggested by ECC colleagues, that as the preferred Minerals sites won't be known for some time, after the UDC plan is submitted, it would not be appropriate/ or possible, for UDC to take account of the emerging plan.
NDLP1966 NDLP2770	Mr Loftus Buhagiar Mrs Isobel Grayson				General comments	Some comments seek to estimate the amount of waste likely to be generated by the new development and question where this will go.	General waste will be sent to appropriate re-cycling/ or landfill that is the responsibility of the County Council as Statutory Waste Authority. ECC will continue to plan for sufficient infrastructure associated with waste management as required. Sewage is the responsibility of Water Companies who will ensure there is sufficient infrastructure in place to manage the proposed developments.
NDLP4073	Salacia Ltd				Policy Wording	One comment questions the suitability for some residential proposals to retain waste on site and suggest that this won't be viable or feasible and that there are various health and safety issues that would arise. This element of the policy should be removed or clarified.	The policy suggests that there should be adequate facilities to allow occupiers to separate and store waste for recycling and recovery is meant to relate to waste being stored prior to collection (typically weekly or fortnightly) – not on a permanent basis. It is quite typical for developments to include storage for recycling containers etc to ensure

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
							residents have adequate opportunities for supporting recycling etc. However, the additional Reference to waste management on site will be removed/ clarified, for example if relating to the construction phase.
NDLP4049	Saffron Walden Town Council				Reference to ECC waste strategy	Suggestion to refer to the ECC waste strategy in the policy	Referring to our response to comment NDLP1821 the mineral and waste plan won't be published until 2025. Therefore, it won't be possible to take account of them in the emerging plan.
NDLP785	Richard Pavitt				Soil	It is suggested that any top soil used as part of the development should be matched to that the surrounding area.	This relates more to the construction materials rather than how 'waste' should be managed. Consideration will be given to this matter nonetheless.
NDLP2334	Mr Edward Gildea				Vision for Waste	The comment refers to the need for a vision for waste for the area as a whole. Will there be new generation of bio-gas for example.	These matters are the responsibility of the Statutory Waste Authority (ECC) who will include consideration for such matters in the updated Waste Local Plan.

Table 13 Core Policy 34: Water Supply and Protection of Water Resources

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP532	Anneka Lannen	Affinity Water			Affinity Water Comments	Affinity Water feedback on our proposed allocations stating that appropriate infrastructure will be required to support the proposals.	Noted. Uttlesford welcome the feedback from Affinity Water and will ensure that this informs the Infrastructure and Policy requirements.
NDLP1614 NDLP1603	Anglian Water Anglian Water				Anglian Water Comments	<p>Anglian Water is requesting involvement in the Water Cycle Study (WCS) stage 2 to assess their sewerage capacity for future growth, proposing updated data and their investment plans to inform phasing of new development. They are also committed to environmental improvements through their business plan, including nutrient removal at water recycling centers, and seek collaboration with the Environment Agency and local authorities to address these challenges and enable sustainable growth.</p> <p>While Anglian Water applauds the inclusion of mandatory water recycling in developments, they urge for a stricter policy framework. They advocate for integrated water management systems in new builds, encompassing Anglian Water is requesting involvement in the Water Cycle Study (WCS) stage 2 to assess their sewerage capacity for future growth, proposing updated data and their investment plans to inform phasing of new development. They are also committed to environmental improvements through their business plan, including nutrient removal at water recycling centers, and seek collaboration with the Environment Agency and local authorities to address these challenges and enable sustainable growth.</p> <p>While Anglian Water applauds the inclusion of mandatory water recycling in developments, they urge for a stricter policy framework. They advocate for integrated water management systems in new builds, encompassing rainwater harvesting and greywater recycling, particularly in expansive projects where cost-effectiveness is optimal. Such systems would necessitate a dedicated dual pipe network for non-potable water, used in toilets, washing machines, and outdoor spaces. By implementing these strategies, Anglian Water believes that larger developments can significantly contribute to improved water efficiency, a goal they wholeheartedly support. They suggest amendments to the policy as follows: 'Integrated Water Recycling Management Development proposals must make appropriate provision for integrated water recycling management measures and should be designed to incorporate appropriate future proofing and best practice techniques. Proposed use of utilising sustainable drainage systems,</p>	Noted. The council will ensure that Anglian Water is involved in the Water Cycle Study for stage 2 to understand the sewerage capacity for future growth and understand phasing plans for future growth. Uttlesford welcome the support for water recycling and will consider the strengthening of words presented by Anglian Water. The Stage 2 water cycle study will progress between Reg 18 and 19 and the Council will ensure that discussions with the Environment Agency and sewerage undertaker will take place to ensure that development impact on the water cycle will be minimised and appropriately mitigated.. Anglian water should be consulted as part of any planning application which affects their waste water treatment works, and developers will be encouraged to discuss proposals with water and sewerage undertakers early in the planning process.

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
						<p>permeable hard surfacing, must be permeable and development proposals should include rainwater re-use and collection mechanisms such as green roofs/walls, rainwater gardens and in residential proposals water collection and recycling facilities such as a rainwater butt'.</p> <p>Anglian water notes that the local plan reference to the water cycle study states that foul drainage and waste water treatment capacity can be provided wherever required in the district but this is also inconsistent with the Interim Sustainability Appraisal (Paragraphs 6.2.73-6.2.76) which states that further work and discussions should be held with the sewerage undertaker and the Environment Agency. Also Anglian Water encourage the council to progress a stage 2 Water Cycle Study. Notes that Anglian water provides a pre application enquiry service and that the wording of the policy should ensure that they are consulted with at the pre application stage of any development proposal.</p>	
NDLP453	Kim Rickards	Planning Director Durkan Homes	Sophie Pain		Consumption Standards Unjustified	<p>Highlighting the unjustified standard of using 90 litres per person per day compared to the national standard being 110 litres per person per day and that using the higher standard of efficiency goes against government policy therefore making the policy unsound. Suggestions to keep to the 110 litres per person per day.</p>	<p>The efficiency standard aligns with the Catchment Based Approach set out in the Chalk Stream Strategy, and reflects the direction of travel in national policy. It is broadly supported by the water companies and the Environment Agency. Evidence which supports a target that goes further than the current lowest optional standard of 110l/p/d will be set out in the evidence base supporting the Reg 19 plan, including the Stage 2 Water Cycle Study.</p>
NDLP1009	Daniel Jones	Director Silverley Properties Ltd					
NDLP2450	Anchor						
NDLP3119	Higgins Group						
NDLP3250	Weston Homes Plc						
NDLP3376	Gladman						
NDLP3622	Hill Residential Ltd						
NDLP4074	Salacia Ltd						
NDLP3644	Newport Parish Council	Newport Parish Council			Delivery of Infrastructure	<p>A comment that argues that the Local Plan should ensure that the water supply and sewage infrastructure are adequate to support new developments before they are occupied. They cite the recent example of Wicken Lea in Newport, where inadequate infrastructure caused sewage overflows, water pressure problems, and disruption for residents. The Council recommends that the Local Plan include a mechanism to verify that infrastructure capacity is sufficient before approving new developments.</p>	<p>The policy in its current state asks that planning permission only be given where sufficient infrastructure exists. The mechanism for this is through development management processes as the water company will be the consulted on any major planning applications. This mechanism will ensure that the water companies can plan for further development.</p>
NDLP2820	Stephen and Heather Ayles				Environment Agency Comments	<p>Environment agency providing detail on the north Uttlesford areas main layers of groundwater sources: a deep water chalk aquifer and a shallower secondary aquifers. They describe how the chalk aquifer is important for public water supply, they mention the importance for it and that Uttlesford should follow the Groundwater Protection guidance on gov.uk which includes the Protect Groundwater and Prevent Groundwater Pollution guidance and The Environment Agency's Approach to Groundwater Protection.</p>	<p>Noted. Uttlesford will consider the relevant regional water plan and ensure that the growth plan aligns with the regional context and Affinity Waters regional plans and is taken into account in the Water Cycle Study that will accompany the regulation 18 plan. Uttlesford welcome the support for a higher water efficiency standard which implemented in the Catchment Based</p>
NDLP1468	Environment Agency						

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP1469	Environment Agency					<p>Anglian Water, Thames Water, Greater Cambridge shared planning and the environment agency all support the government's intention to improve water efficiency standards in building regulations to 100 l/p/d for water stressed areas, as a minimum. They have already promoted a higher optional standard of 110 l/p/d across all local planning authorities within their region, with 54 of 59 LPAs having adopted or proposing to include this in their local plans. Anglian Water is also working with the Environment Agency, Natural England and Cambridge Water on a Joint Protocol for Water Efficiency which endorses the government's Environmental Improvement Plan intention to improve the building regulation water efficiency for 100 l/p/d for water stressed areas, as a minimum. The Joint Protocol will also encourage local planning authorities to go beyond this towards 80 l/p/d. Anglian Water believes that more water efficient development will lead to reductions in operational carbon. They are supporting the Joint Protocol with an evidence base that will be regularly updated as new data and information is published. Thames water also support the 90 l/p/d approach, but state that in building regulations G2 the optional requirement for water efficiency is 110 l/p/h not 90, this would need to be secured through planning conditions, they state that the policy should impose planning conditions on all residential development. Greater Cambridge Shared Planning Service has also stated that they are willing to assist Uttlesford in providing an evidence base to support the efficiency standard of 90 l/p/d.</p> <p>Recommendations that the local plan require non-residential developments achieve a BREEAM efficiency rating of outstanding and that any refurbishments or changes of use of existing buildings should include retrofitting for the purpose of increasing water efficiency.</p> <p>Recommendation that the retrospective fitting water efficiency measures should be considered in existing properties due to the higher than average consumption in the district.</p> <p>Comment stating that the supporting text for core policy 34 be updated to reflect the environmental benefits of improved water efficiency and that the wording should include the legally binding nature of the Water Framework Directive as per regulation 33. Also support for the policy that new development don't reduce groundwater levels or surface water flows.</p> <p>Comment arguing that installing efficient water fittings and recycling systems can reduce water usage and greenhouse gas emissions, the comment cites a study from the environment agency that 89% of greenhouse gas emissions from the water system come from household water use. It recommends incorporating this message into core policy 22 and 34, to encourage water efficiency and potentially reduce both environmental impact and household costs.</p> <p>Comment stating the Environment Agencies support for greywater/rainwater recycling but a request for further detail on this policy. They acknowledge that water companies cannot supply this and that this would need to be actioned by a third party. They also acknowledge that designing these policies for new developments will need to be done on a case by case basis.</p> <p>A comment that highlights the lack of the Water Framework Directive (WFD) in the local plan's water resources text, recommending a dedicated section for its relevance and requirements. Additionally, it proposes revisions to Core Policy 34: ensuring sustainable water sources for developments while considering regional growth and phasing, and protecting both chalk and source protection zones from contamination.</p>	<p>Approach set out in the Chalk Stream Strategy. The council will continue to work with stakeholders to provide further evidence to support this and this will form part of the reg 19 evidence base.</p> <p>Uttlesford understand the environmental benefits of improved water efficiency and will consider the wording changes to better reflect the WFD. Uttlesford understand this point regarding the impact of efficient water fittings and recycling systems and how they can reduce water usage and greenhouse gas emissions.</p> <p>Uttlesford welcome the support for this policy but understand the restrictions that come with greywater/rainwater recycling and will ensure that these are reflected in further amendments to the policy and supporting text for regulation 19.</p>
NDLP2640	Greater Cambridge Shared	Planning Policy Manager Greater				<p>Cambridge shared planning are concerned about water stress in the region, especially regarding chalk streams. They want to make sure the Uttlesford Local Plan's development targets are in line with regional water plans and won't strain water resources. Since water management operates on a</p>	<p>Noted. Uttlesford will consider the relevant regional water plan and ensure that the growth plan aligns with the regional context and Affinity Waters regional plans.</p>

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP2641	Planning Service Greater Cambridge Shared Planning Service	Cambridge Shared Planning Service Planning Policy Manager Greater Cambridge Shared Planning Service				regional level, the Councils suggest Uttlesford District Council confirm with Affinity Water that the growth plan aligns with their latest water resource plan, considering potential restrictions to protect delicate waterbodies. Broad support for the principle of core policy 34 but concern on how developments will contribute to achieving the 'good' status described in the policy. Anglian Water, Thames Water, Greater Cambridge shared planning and the environment agency all support the government's intention to improve water efficiency standards in building regulations to 100 l/p/d for water stressed areas, as a minimum. They have already promoted a higher optional standard of 110 l/p/d across all local planning authorities within their region, with 54 of 59 LPAs having adopted or proposing to include this in their local plans. Anglian Water is also working with the Environment Agency, Natural England and Cambridge Water on a Joint Protocol for Water Efficiency which endorses the government's Environmental Improvement Plan intention to improve the building regulation water efficiency for 100 l/p/d for water stressed areas, as a minimum. The Joint Protocol will also encourage local planning authorities to go beyond this towards 80 l/p/d. Anglian Water believes that more water efficient development will lead to reductions in operational carbon. They are supporting the Joint Protocol with an evidence base that will be regularly updated as new data and information is published. Thames water also support the 90 l/p/d approach, but state that in building regulations G2 the optional requirement for water efficiency is 110 l/p/h not 90, this would need to be secured through planning conditions, they state that the policy should impose planning conditions on all residential development. Greater Cambridge Shared Planning Service has aslo stated that they are willing to assist Uttlesford in providing an evidence base to support the efficiency standard of 90 l/p/d.	More detail on this policy will be provided at the regulation 19 stage of the Local Plan Uttlesford welcome the support for a higher water efficiency standard which implemented in the Catchment Based Approach set out in the Chalk Stream Strategy. The council will continue to work with stakeholders to provide further evidence to support this and this will form part of the reg 19 evidence base.
NDLP2007	Home Builders Federation				HBF Comments	This comment argues that part of a proposed planning policy is unsound. The specific issue is that it would place the burden on developers to demonstrate water and sewage capacity, rather than on water companies. The comment asserts that water companies have a legal duty under Section 37 of the Water Industry Act to provide services to new developments. They conclude that this policy requirement contradicts national standards and that the Council must work with water companies to ensure sufficient water resources for planned development. Also highlighting the unjustified standard of using 90 litres per person per day compared to the national standard being 110 litres.	Whilst water and sewerage undertakers have a statutory duty to provide connections to serve new development, it is important that proposals for new development do not result in an unacceptable impact on drinking water supplies or wastewater treatment capacity. Applicants have a responsibility to ensure that their proposals are sustainable, whether this is through a phased approach to development or through confirmation from the water and sewerage undertakers that sufficient capacity exists to serve the proposed development. We therefore expect applicants to demonstrate that the appropriate connections to the water and wastewater network can be secured before the development is occupied. We will consider whether amendments are required to the policy or supporting text to make this position clearer. The efficiency standard aligns with the Catchment Based Approach set out in the Chalk Stream Strategy and is broadly supported by the water companies and the Environment Agency. Evidence which supports a target that goes further than the current lowest optional standard of 110l/p/d will be set out in the evidence base supporting the Reg 19 plan, including the Stage 2 Water Cycle Study.
NDLP1937	Mr Roy Pike				Infrastructure Delivery	Concerns on how the utility infrastructure will be provided for by developers, how it has been approved by utility companies and how it will be funded for rather than left to developers and inspectors to deal with.	Uttlesford through core policy 5 will ensure that developers provide the sufficient funding for the required infrastructure identified in the IDP. Throughout this process the council will work with the utility companies to ensure that development

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
							proposed in the local plan will met with sufficient upgrades to the utility system when required.
NDLP1117	Kim Crow				Lakes	Suggestions for a standard for having a lake or reservoir, per a certain amount of housing. To be used for fire control, water infrastructure capacity, recreation resource and fishing resource.	The Council works with water companies to ensure that there is sufficient capacity to accommodate the growth set out in the plan, and this work has not identified the need for localised water storage. However, Core Policy 37 does require the provision of SuDS in major development proposals, and this may include the construction of attenuation ponds that have the potential to be used for a range of activities. Applications which include the provision of drainage ponds will be determined on their individual merit.
NDLP2641 NDLP4050 NDLP1490 NDLP786 NDLP2019	Greater Cambridge Shared Planning Service Saffron Walden Town Council Thames Water Richard Pavitt Ickleton Parish Council	Planning Policy Manager Greater Cambridge Shared Planning Service			Policy Wording	A number of comments relate to the policy wording. These include: <ul style="list-style-type: none"> • highlighting the benefits of recycling water in reducing flood risk and the benefits of SuDs in filtering water to improve water quality. It also asks that the policy seek opportunities for aquifer recharge through appropriate land management. • proposing tweaks to Core Policy 34, Firstly to widen scope to include both homes and industry, secondly to encourage water recycling in new builds, thirdly discourage water-wasting developments, and to define penalties for pollution. • Suggests that the wording of the policy means that all development that achieves the 90 litres per person per day will be supported. • Concerns over the lack of detail on the authorities requirements and how the policies objectives are to be attained. 	Uttlesford recognise the benefits of recycling water in reducing flood risk and the benefits of SuDs in filtering water to improve water quality, the council will consider seeking opportunities for aquifer recharge. Uttlesford will ensure that the policy covers all types of development. The policy does not state that permission will be granted for development proposals that meet the water efficiency targets, but it does indicate that compliance with this aspect of the policy will be viewed positively as part of the planning balance. There are a wide range of factors that will be taken account in the decision-making process, including conformity with local and national policy and legislation, and each application will be determined on its individual merits. Uttlesford will provide more detail in the policy by using evidence gathered before reg 19 but through core policy 71 will ensure that the policies objectives will be met through a sufficient monitoring framework.
NDLP1614	Anglian Water				Support for Standard	Anglian Water, Thames Water, Greater Cambridge shared planning and the environment agency all support the government's intention to improve water efficiency standards in building regulations to 100 l/p/d for water stressed areas, as a minimum. They have already promoted a higher optional standard of 110 l/p/d across all local planning authorities within their region, with 54 of 59 LPAs having adopted or proposing to include this in their local plans. Anglian Water is also working with the Environment Agency, Natural England and Cambridge Water on a Joint Protocol for Water Efficiency which endorses the government's Environmental Improvement Plan intention to improve the building regulation water efficiency for 100 l/p/d for water stressed areas, as a minimum. The Joint Protocol will also encourage local planning authorities to go beyond this towards 80 l/p/d. Anglian Water believes that more water efficient development will lead to reductions in operational carbon. They are supporting the Joint Protocol with an evidence base that will be regularly updated as new data and information is published. Thames water also support the 90 l/p/d approach, but state that in building regulations G2 the optional requirement for water efficiency is 110 l/p/h not 90, this would need to be secured through planning conditions, they state	Uttlesford welcome the support for a higher water efficiency standard which implemented in the Catchment Based Approach set out in the Chalk Stream Strategy. The council will continue to work with agencies to provide further evidence to support this and this will form part of the reg 19 evidence base.

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
						that the policy should impose planning conditions on all residential development. Greater Cambridge Shared Planning Service has also stated that they are willing to assist Uttlesford in providing an evidence base to support the efficiency standard of 90 l/p/d.	
NDLP1490	Thames Water				Thames Water Comments	Thames Water support requirements for water efficient development which can reduce foul flows arising from new development as well as reducing potable water demands. Core Policy 34 refers to supporting water efficiency of 90 l/p/d in the Building Regulations G2. The optional requirement in Building Regulations G2 is 110 l/p/d rather than 90 and it is assumed that the higher target of 90 l/p/d would need to be secured by planning conditions. Higher water efficiency requirements are supported but as a minimum it is considered that the policy should refer to imposing conditions on all residential development which are necessary to ensure that the optional requirements in Building Regulations G2 is implemented. In applying conditions it is recommended that any such condition should refer to measuring water efficiency using the fittings based approach.	Uttlesford welcome the support for a higher water efficiency standard which implemented in the Catchment Based Approach set out in the Chalk Stream Strategy. The council will continue to work with stakeholders to provide further evidence to support this and this will form part of the reg 19 evidence base.
NDLP314	Sally Taylor				Water and Sewage Infrastructure Overcapacity	Pointing out the pressures from new development on the existing water and sewage infrastructure in Uttlesford and the risk of the sewerage capacity being overwhelmed causing sewage discharge in local water courses. Also pointing out the fact that does not have capacity for new development due to the Affinity Region being over abstracted. Also, Widdington Parish Council has pointed out concerns regarding the Widdington pumping station pipe issues to which Anglian water are investigating and concern that the planning system is not taking these issues into account.	Water/wastewater infrastructure is the responsibility of the relevant water company. The development proposed in our plan has been tested against the existing capacity through the Stage 1 Water Cycle Study, which demonstrates that sufficient wastewater capacity exists or can be provided through infrastructure upgrades to meet the development needs of the district. This study was prepared in consultation with water companies and the updated evidence base for the Reg 19 plan, including the Stage 2 Water Cycle Study, will have further clarification on how water and sewage infrastructure provision will be considered.
NDLP650	John Howett						
NDLP710	Mrs Julie McSweeney						
NDLP786	Richard Pavitt						
NDLP2909	Debden Parish Council						
NDLP3205	J Damany-Hosman						
NDLP178	Mrs Janice McDonald						
NDLP2514	Widdington Parish Council						
NDLP178	Mrs Janice McDonald						
NDLP462	Mrs Margaret Hudson						
NDLP3251	Weston Homes Plc				Water Supply	Questioning where potable water will come from once water efficiency is achieved and once new housing is built, where will the extra wastewater go?	Uttlesford will work with the Utility companies to ensure that potable water will be provided to all new developments, but the new water efficiency measures will ensure that 'water neutrality' will be met in the districts high water stress level.
NDLP1967	Mr Loftus Buhagiar						

Table 14: Core Policy 35: Chalk Streams Protection and Enhancement

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP4160	G W Balaam & Son	G W Balaam & Son	Matthew Thomas		Broad policy support	Broad Support for the policy noting the importance of protection of the chalk streams, support of the need for an impact study to accompany development and highlighted the opportunities presented to implement this policy on allocated sites. A comment also stating that CP35 is listed in the plan as CP36. One comment suggested that restoration techniques should consider the appropriateness of the techniques.	Noted. The Council will continue to support chalk stream protections through the Local Plan and further evidence on the basis for the policy will be provided at Reg 19. Note that the policy is listed as Core Policy 35 in the draft (Reg 18) Local Plan. Also appropriate techniques should be considered depending on the situation.
NDLP260	Val McKirdy						
NDLP349	Mrs Jane Sharp						
NDLP602	Stephanie Gill						
NDLP698	Nigel Wood						
NDLP1122	James Balaam						
NDLP1466	Environment Agency						
NDLP1521	Natural England						
NDLP1615	Anglian Water						
NDLP3674	Little Hallingbury Parish Council						
NDLP1191	Newport Parish Council						
	Ashdon Parish Council						
NDLP1720	Thaxted Parish Council	Thaxted Parish Council			Clarification on what constitutes a chalk stream	A number of comments seek clarification on what constitutes a chalk stream, and/ or catchment.	Appendix 9 indicates the extent of the chalk streams in the district as designated by Natural England. Amendments to the map will be considered and additional chalk stream evidence will be published at Reg 19.
NDLP1196	Ashdon Parish Council						
NDLP2412	Jane Gray						
NDLP3583	Ashdon Neighbourhood Plan Steering						
NDLP3589	Ashdon Neighbourhood Plan Steering						
NDLP4041	MAG London Stansted Airport						
NDLP3584	Ashdon Neighbourhood Plan Steering				Concerns over sewerage infrastructure	Ashdon sewerage infrastructure is at capacity and represents a potential threat to River Bourne candidate Chalk Stream.	UDC is working with water companies and will strengthen Chalk Stream policies to align with water resources policies for Regulation 19. The River Bourne at Ashdon is not

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
							currently identified by Natural England as a 'confirmed' or 'likely' Chalk Stream. It is not classed as a Statutory Main River monitored by the Environment Agency. UDC is working with other stakeholders to develop a Catchment Based Approach (CaBA) to Chalk Stream conservation.
NDLP1466	Environment Agency				Environment Agency - Riparian Corridors Aspiration	The Environment Agency applauds the use of buffer zones along waterways, urging their implementation for all water courses. It supports the existing 10m buffer proposal and advocates for expanding it to 15m for chalk streams. Highlighting the ecological significance of these zones as wildlife corridors and natural filters, it stresses the need for native vegetation and future maintenance access. However, it raises concern about potential encroachment by residential development, advocating for prioritizing public open space over private gardens within riparian corridors. A dedicated paragraph in the Natural Environment section is suggested to underscore the importance of protecting these vital zones.	Mandatory Biodiversity Net Gain will come into effect on 12th February 2024. At that point, most developments will need to demonstrate a 10% biodiversity enhancement for all watercourses where the site redline boundary is within 10m of the watercourse bank shoulder. This is in addition to mandatory 10% Biodiversity Net Gain for both terrestrial habitats and for hedgerows. Assessment of the watercourse habitat baseline, and the impacts of any proposed development on it, is comprehensively addressed within the Statutory Biodiversity Net Gain Watercourse Metric. Additionally, river corridor habitats, and particularly those for Chalk Streams, will be identified as priorities within the emerging Essex Local Nature Recovery Strategy. This will give these habitats enhanced strategic significance when assessing biodiversity value thereby elevating the baseline value and consequently the necessary biodiversity enhancement necessary to deliver 10% BNG. These new measures provide a more precautionary approach than a finite buffer, potentially identifying buffers of much more than 10m as well as significant practical enhancement actions. UDC is currently collating evidence to support the requirement of 20% Biodiversity Net Gain and this will again be required for watercourses in addition to hedgerows and other terrestrial habitats.
NDLP2642	Planning Policy Manager Greater Cambridge Shared Planning Service				Greater Cambridge - Further detail on implementation of the policy should be provided	Supports the policy but underlines need for more policy development particularly related to how the policy will be implemented.	Noted. Consideration for whether greater detail can be provided will be considered to inform the Reg 19 version of the Plan.
NDLP320	Mrs Jane Sharp				Location of Development	It is suggested that development should be located to avoid any impact on Chalk Streams which is considered to be not evidence based on the proposals in the Reg 18 Plan.	The Plan is informed by detailed Water Cycle Study evidence and engagement with a range of water companies and relevant statutory consultees - none of these have identified any issues associated with any of the proposals currently identified.
NDLP787 NDLP1125	Richard Pavitt Harriet Burrow				Questioning the detail in appendix 9 - Chalk Streams in Uttlesford	Questioning the level of detail available in appendix 9 to ensure that rivers in the region are protected. States that parts of the upper Chelmer aren't marked on the map and that this is important to avoid challenge with developers.	Appendix 9 indicates the extent of the chalk streams in the district as designated by Natural England. Amendments to the map will be considered and additional chalk stream evidence will be published at Reg 19.
NDLP594	Mr John Burnham				Questions the practicality of implementing a 15m buffer in all different sizes and geomorphologies of chalk stream.	Asks for further detail on the practicalities of implementing these policies on all geomorphological contexts of chalk streams also questions the necessity of having a 15m buffers on tiny streams as well.	Noted. Further evidence on the rationale for the 15m buffer and the implementation of the policy will be provided at Reg 19. Consideration will be given to flexibility in the extent of the buffer should the evidence suggest this is necessary.
NDLP787	Richard Pavitt				Revision suggestions for river protection.	Suggestions for corrections to 9.112 regarding the river cams status and requests for highlighting the impacts of phosphorus discharge from wastewater treatment works. Concerns about defining a 15m protection	Noted. We will consider the need for amendments to the supporting text in the Reg 19 plan and will be publishing further evidence on chalk streams and the water cycle at Reg 19. Consideration will be given to flexibility in the

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
						zone, suggests making it the minimum allowing for wider protection zones based on local circumstances.	extent of the buffer should the evidence being prepared to support the Reg 19 plan suggest this is necessary.
NDLP3538	Ashdon Neighbourhood Plan Steering				River Bourne at Ashdon should be classed as a Chalk Stream	River Bourne at Ashdon should be classed as a Chalk Stream and raising concerns over flooding in Ashdon	The River Bourne at Ashdon is not currently identified by Natural England as a 'confirmed' or 'likely' Chalk Stream. It is not classed as a Statutory Main River monitored by the Environment Agency. UDC is working with other stakeholders to develop a Catchment Based Approach (CaBA) to Chalk Stream conservation.
NDLP3252	Weston Homes Plc				Water resource issues	Highlights that problems with water resources require national collaboration and cannot be tackled by developers alone.	UDC is working with water companies and will strengthen Chalk Stream policies to align with water resources policies for Regulation 19.
NDLP1466	Environment Agency				Working with Water Companies	Affinity Water's water transfer schemes mean new developments needn't solely rely on local chalk aquifers, potentially protecting these sensitive ecosystems. When planning development, consider the wider catchment and existing water usage to assess the true impact on the chalk. Collaborate with Affinity Water to ensure development sources don't worsen environmental targets set by the Water Framework Directive (WFD). Remember, even though local chalk streams lack individual designations, WFD regulations still govern changes and must be adhered to.	Noted, Uttlesford will continue work collaboratively with the relevant water bodies to ensure that chalk streams are protected and that relevant directives are adhered to.

Table 15 Core Policy 36: Flood Risk

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP1462	Environment Agency				Absence of Level 1 SFRA	Comment pointing out concern about the omission of the Level 1 SFRA assessment, when it is referenced in the addendum the updated SFRA is referenced.	Noted, Uttlesford has produced a Stage 1 SFRA in 2021, unfortunately this was not published alongside the addendum at regulation 18 stage and will be published alongside the stage 2 assessment at regulation 19 stage.
NDLP1197 NDLP3585	Ashdon Parish Council Ashdon Neighbourhood Plan Steering				Ashdon	Concern on the practicalities of building on floodplain areas within Great Dunmow and Ashdon, highlighting a flood control measure in Chelmsford that had an effect of increasing flooding upstream. Also a concern on the increased risk of flooding down stream at Church End. Reference should be made to CH 9 of the Neighbourhood Plan ASH9 policy and that the local plan should consider this evidence.	Our plan is informed by updated flood risk evidence and is prepared in consultation with the environment agency. Any sites considered in our proposals need to comply with national policy requirements on flooding. Any cross district issues on flooding would have been flagged by the environment agency, and these issues will be dealt with accordingly.
NDLP1462	Environment Agency				Clarity - Sequential Test	Comment asking for clarity when applying the sequential approach and that it should be taken within areas at risk of flooding, with development located within parts of the site at lowest risk of flooding.	Noted. This conforms with the Council's understanding. This will be covered off in the updated SFRA to be published alongside the Reg 19 version of the Plan.
NDLP1462	Environment Agency				Culverts	Comment requesting that more is suggested in the policy to require developers not to build over culverts to create a betterment for flood risk	Noted. Flood risk from culverts will be prevented or mitigated for when assessing flood risk on development, wording on preventing developers not to build over culverts will be considered for the Reg 19 version of the Plan.

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP146 2	Environment Agency				Environment Agency - 8m buffer from riverbank	Comment from the Environment Agency requesting that all development be subject to an 8m buffer consistent with the chalk stream policy.	Noted. The policy requirements will be reviewed as informed by the updated evidence to inform the Reg 19 version of the Plan.
NDLP146 2	Environment Agency				Finished floodplain	A comment from the environment agency pleased to see that the finished flood levels be raised 600mm above the 1 in 100 year plus climate change flood level. However, we recommend that this requirement only applies to residential or 'more vulnerable' development as it may be acceptable for 'less vulnerable' or 'water compatible' development to have FFLs set lower than this. Overall, any development that has been located and proposed to be in this extent must ensure that their finished floor levels are at a minimum 300mm above the 1 in 100 year+ Climate Change level and seek to maximise mitigation measures such as property resilience. Safe access should be considered in accordance with FD2320. We also suggest rewording point V. to: 'raise finished floor levels 600mm above the 1 in 100-year flood level, including an appropriate allowance for climate change.' We recommend that the policy states that where detailed hydraulic modelling of a watercourse is not available, modelling will need to be undertaken as part of a site-specific FRA to estimate the 1 in 100-year flood level, including an appropriate allowance for climate change.	Noted. The text will be updated accordingly.
NDLP146 2	Environment Agency				Functional Floodplains	Comment requesting more detail about protecting functional floodplains.	Noted. Greater reference to functional floodplains will be added to the supporting text for the Reg 19 version of the plan.
NDLP65	Catherine Charles				General Comments	Building in the flood plain will accentuate localised flooding e.g. from River Chelmer and the local plan does not seem to propose any mitigation.	Each site development scheme we will have a drainage strategy that will be agreed with the Environment Agency and County as local flood authority and takes into account the Strategic Flood Risk Assessment already undertaken by Water Cycle consultants. Each scheme will have a detailed drainage strategy including the retention of surface water and will take into account potential for flooding and climate change.
NDLP135 1 NDLP248 NDLP122 NDLP778 NDLP228 4 NDLP249 2	Sarah Eley Julian Hart Mr Antony Johnson Roderick Jones Julian Hennessey Miss Kathryn Woods				Localised Flooding - Church End/ River Chelmer	Concern on the practicalities of building on floodplain areas within Great Dunmow and Ashdon, highlighting a flood control measure in Chelmsford that had an effect of increasing flooding upstream. Also a concern on the increased risk of flooding down stream at Church End.	Our plan is informed by updated flood risk evidence and is prepared in consultation with the environment agency. Any sites considered in our proposals need to comply with national policy requirements on flooding. Any cross district issues on flooding would have been flagged by the environment agency, and these issues will be dealt with accordingly.
NDLP2112	Mr and Mrs Hockley				Localised Flooding - Clavering	Concerns about flooding in Clavering and requests that the council prioritise Brownfield/Infill sites rather than building on agricultural land.	Our plan is informed by updated flood risk evidence and is prepared in consultation with the environment agency. Any sites considered in our proposals need to comply with national policy requirements on flooding. Any cross district issues on flooding would have been flagged by the environment agency, and these issues will be dealt with accordingly.

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP1719	Thaxted Parish Council	Thaxted Parish Council			Localised Flooding - Thaxted	Comment highlighting that Thaxted has a long history of flooding due to an outdated sewage system and that new developments have made things worse. It states that past complaints haven't been addressed. Despite repeated flooding, there have been raw sewage releases during heavy rain, Anglian Water hasn't significantly upgraded the pumping station or improved communication. The writer proposes stricter planning policies to make developers include stronger flood mitigation measures, like increased runoff storage, in areas with known flooding problems.	Our plan is informed by updated flood risk evidence and is prepared in consultation with the environment agency. Any sites considered in our proposals need to comply with national policy requirements on flooding. Any cross district issues on flooding would have been flagged by the environment agency, and these issues will be dealt with accordingly.
NDLP1516	Natural England				Natural England - Appropriate Infrastructure to address flood risk from climate change	A comment from Natural England ensuring that new developments should avoid flood risk zones and incorporate green features to manage potential floods. This includes designing houses to handle rainwater runoff, creating wetlands to absorb water, using permeable surfaces, and incorporating rainwater recycling systems. These measures should be part of a comprehensive green infrastructure strategy following set guidelines.	The plan will ensure that green features should be incorporated to manage potential floods, having a reference to this in policy will be considered.
NDLP3675	Newport Parish Council	Newport Parish Council			Newport	Comment questioning why Newport wasn't included as a tier two area of local flood risk in paragraphs 9.118-9.119 - photographic evidence was submitted with the proposal.	The Council has commissioned detail flood risk assessment evidence which utilises the latest data available from the Environment Agency in relation to both surface water and fluvial flooding. Overall, the Council is content that appropriate data is being utilised to inform any assessment work.
NDLP4052	Saffron Walden Town Council	Deputy Chair Keep Clavering Rural			Policy Wording	A number of comments relating to the policy wording were received, including: •requesting that the wording is changed in paragraph 9.116 from “Many of the settlements...have experienced flooding...” to add “and the roads between them such as the B1383 between Saffron Walden and Newport” •there should be a reference to the Green and Blue Infrastructure Strategy •a request that the policy should state that all development proposals should seek opportunities to reduce flood risk to existing communities at risk of flooding. •requesting that development sites should not be allocated on or reliant on access from a flood risk area •requesting that the wording be changed in paragraph 9.118 from 'or blocked culverts' to 'drains and blocked culverts', and •requesting more detail on the council's commitment to reduce flood risks to adhere with the NPPF and PPG.	Noted. Consideration will be given to updating the wording as indicated. The Council does have believe the wording is consistent with the NPPF and NPPG and will continue to engage with the Environment Agency through the Duty to Cooperate to assist the development of the policy and Local Plan.
NDLP1462	Environment Agency						
NDLP677	Mr Frank Woods						
NDLP4052	Saffron Walden Town Council						
NDLP1462	Environment Agency						
NDLP603	Stephanie Gill	Planning Cambridgeshire County Council			Support for Flood Risk Policy	Broad Support for the flood risk policy whilst highlighting that strategic objective, 1, 2 and 3 should not be diminished. But comment highlighting the need of reference to the NPPF and PPG guidance will be helpful.	The council welcomes the support for this policy and understands how important it is for residents.
NDLP699	Nigel Wood						
NDLP1373	N/A						
NDLP2743	Paula Griffiths						
NDLP4075	Salacia Ltd						

Table 16 Core Policy 37: Sustainable Urban Drainage

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP4042	MAG London Stansted Airport				Aviation	Stansted Airport Ltd supports Policy 37 on Sustainable Urban Drainage (SuDS) in principle but wish to highlight the importance of considering the potential impact on aviation safety when assessing planning applications that involve sustainable urban drainage systems. Policy 37 should therefore include a further criterion which reflects the need to consider the impact upon aviation.	Noted. The policy will be updated to reflect the comments raised.
NDLP1616	Anglian Water				Policy Wording - Anglian Water	<p>Anglian Water welcome the policy and support the use of SUDS and details of work being carried out by Anglian Water is presented. A number of suggested amendments to the policy are outlined:</p> <ul style="list-style-type: none"> •The policy should be strengthened to require natural flood management measures on strategies sites. •The policy should be framed in a more positive light – all major development will be required to incorporate SUDS for the management of surface water run-off, unless there is clear evidence to demonstrate this would be inappropriate, would lead to significant harm to water quality, flood risk or biodiversity. The use of natural flood management techniques to provide multi-functional benefits for water quality, local amenity, and biodiversity, is supported. Strategic sites should include natural flood management techniques, unless it can be demonstrated to the satisfaction of the decision-maker that it is not feasible. <p>Anglian Water also consider that new development should be located in sustainable and resilient locations to ensure that climate change mitigation and adaptation measures can be successfully attained. Where Anglian Water is identified as the lead Risk Management Authority, they should be contacted as part of the Development Management process.</p>	Noted. Consideration will be given to updating the policy as indicated.
NDLP1467	Environment Agency				Policy Wording - Environment Agency	<p>The Environment Agency are very supportive of the requirement under Core Policy 37 (Draft Local Plan, page 145) that all major development will be required to use sustainable drainage systems (SuDS) for the management of surface run-off. We recommend that a line be added to both policies which states that SuDS and GBI are important for preventing the deterioration of and/or achieving enhancements of the ecological status of WFD designated water bodies and their associate elements.</p> <p>Uttlesford District Council has a legal responsibility under regulation 33 of the WFD. There are many WFD designated water bodies in Uttlesford, including nine surface water bodies and two groundwater bodies within Hertfordshire and North London (see table below). We note that this responsibility is acknowledged in the Uttlesford GBI Strategy (Uttlesford Green and Blue Infrastructure Strategy, page 55). It is therefore important that this responsibility is reflected in Core Policy/ies 37/39.</p> <p>By deploying SuDS effectively throughout the district, Uttlesford District Council can therefore increase the rates of water attenuation and reduce the volumes reaching the sewers.</p> <p>We recommend revision to reflect the following comments about infiltration SUDs: The use of infiltration SUDs is not appropriate on all sites and in all locations. They should not be constructed in contaminated ground and should not be used where infiltration can re-mobilise contaminants already within soils to pollute groundwater. Where peak seasonal groundwater levels are shallow this may constrain the potential for infiltration drainage or the choice of infiltration SUDs due to a requirement to maintain a minimum unsaturated zone thickness beneath the infiltration level. The use of deep infiltration systems such as boreholes is not routinely acceptable. Deep infiltration schemes will only be approved where there are no other feasible disposal options such as</p>	Noted. The Policy and supporting text will be updated accordingly.

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
						shallow infiltration systems or drainage fields/mounds and where the developer demonstrates no unacceptable pollution risk to groundwater. If approved, they may require an environmental permit. We recommend that the following guidance be referenced: The Environment Agency's Approach to Groundwater Protection, particularly statements G1 and G9 to G13; The CIRIA C753 SUDS Manual; The Susdrain website; and The Sustainable Drainage Systems: Non-Statutory Technical Standards guidance on gov.uk	
NDLP402	Louise Johnson	Parish Clerk Elsenham Parish Council			Policy Wording - General Comment	It is agreed that 'All proposals for SuDS should include arrangements for their whole life management and maintenance'. These arrangements should be in the hands of a management company or other suitably qualified undertaking. SuDS should not be offered to town and parish councils to take over as part of the transfer of open space areas. Comment stating that natural flood plains should do their work in the best ability and that building on flood plains acts as a catalyst to further flooding incidence.	Noted. Whilst it is recognised that management of SUDS may be required for the long-term, it may not always be possible for these to be funded on a permanent basis and some longer-term solutions may be required. Uttlesford will ensure that future development will have sufficient Sustainable Urban Drainage solutions in accordance with core policy 37 and further information on management will be added to the supporting text.
NDLP2699	Pascale Muir						
NDLP1517	Natural England				Policy Wording - Natural England	Natural England consider the policy should make reference to the Flood and Water Management Act 2010, which underpins the recommendation that all relevant development should include SUDS. All proposed residential and non-household development should provide a comprehensive flood risk and surface water drainage strategy, which should set out the application will address flood risk. Consideration should be given to the design/ location of GI as this will have a bearing on how well they help to address flood risk.	Noted. The policy will be updated accordingly.
NDLP1491	Thames Water				Policy Wording - Thames Water	Thames Water consider that given the wide range of benefits that SuDS deliver it is considered that the policy should be applicable to all development and not just major development. Such an approach would assist with meeting the Environmental Strategic Objectives of the Local Plan in Table 3.1	Noted. Consideration will be given to updating the policy to reflect the comments.
NDLP351	Mrs Jane Sharp				SUDS Management	Concern is raised where residents are responsible for the management contract of SUDS which is described as unacceptable as the residents have no control over the management of the contract if the work is not completed correctly – which is suggested may be the case. All SUDS should be adopted by an appropriate body. It is suggested that the last paragraph of CP37 is too vague and clearer and stronger guidance is needed relating to the longer-term management of SUDS.	Noted. Further detail on management of SuDS will be added to the supporting text for this policy.
NDLP357	Mrs Margaret Shaw						
NDLP4053	Saffron Walden Town Council						
NDLP2700	Pascale Muir				Support	The use of natural flood management techniques is supported – this allows this natural floodplain to do its work to the best of its ability. Other comment of general support received.	Noted.
NDLP4076	Salacia Ltd						

Table 17 Core Policy 38: The Natural Environment

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP1617	Anglian Water				Anglian Water - LNRS	Anglian Water consider that the Local Nature Recovery Strategies (LNRS) are of significant importance and should be referenced in policy to guide appropriate mitigation or compensation measures. The LNRS allow for targeted, co-ordinated and collaborative action to address the decline of nature and provide a framework to help realise the multiple benefits which can be achieved through nature-based solutions.	The Essex Local Nature Recovery Strategy is not yet published but reference will be made where appropriate to Nature Recovery Strategies including national strategies

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NDLP4055	Saffron Walden Town Council				Appendices	A number of comments relate to the plan appendices and request: <ul style="list-style-type: none"> • The range of important sites and habitats should be listed for easy reference and included within an appendix. • The Hatfield Forest Zone of Influence Map at Appendix 11 should be up to date and states the ZOI distance. • Special Roadside Verges should be added – it is suggested that some are missing. 	Noted. Uttlesford will ensure that this appendix will show the correct, most up to date designations and will list them appropriately.
NDLP4171	Saffron Walden Town Council						
NDLP2675	National Trust						
NDLP3590	Ashdon Neighbourhood Plan Steering						
NDLP1372	N/A	Planning Cambridgeshire County Council			Appendices - Cambridge County Council	It is suggested that any County Wildlife Sites/ Local Geological Sites situated on land adjoining to/ within close proximity to Uttlesford which could be adversely impacted by developments are also included in the Appendices.	Noted. Uttlesford will consider including these sites in the regulation 19 draft as they may be adversely affected.
NDLP3623	Hill Residential Ltd				Developer Contributions	One comment asks for greater information about the level of contribution that will be sought from residential development to fund mitigation relating to Hatfield Forest and what on-site mitigation will be sought.	Noted. Uttlesford will provide further details on the level of contributions for the Hatfield Forest Zone of Influence as shown in appendix 12.
NDLP3140	Stop Easton Park				Hatfield Forest	A number of comments were received relating to Hatfield Forest. These include: <ul style="list-style-type: none"> • Comments from the National Trust, noting the results of the footprint ecology report relating to Hatfield Forest visitor pressure. They note that 75% of the visitors come from the zone of influence. They also note that this survey was done in 2019 and 2022 and that paragraph 2.26 the draft local plan includes a reference to a 2018 study that should be updated to also include reference to the Hatfield Forest NNR Visitor Survey 2022. • The National Trust also support protecting Hatfield Forest from development pressures. Their surveys show the forest is crucial greenspace for the area. They agree with Core Policy 38 requiring mitigation from new developments but believe it should be stronger. They recommend requiring contributions from all new homes within an 11km zone to fund a management strategy which should be outlined in a separate document. • Comments requesting further detail on how the contributions will be sought from the Hatfield Forest Mitigation Strategy. • A comment argues that paragraphs 9.137 and 9.138 of the draft plan fail to mention the accepted solutions for protecting Hatfield Forest, which is to provide alternative facilities. It further argues that Easton Park is the ideal solution, but this is not mentioned in the plan either. Without this crucial information, the comment concludes that these paragraphs lack relevance and credibility. • Another comment suggests that SAMMs alone will not adequately address the pressure on the Forest and that a strategic solution is required which would involve legal agreements, high quality green infrastructure and the provision of new strategic open spaces such as country parks (SANGS). 	Noted. Work is ongoing to develop the strategy for collecting contributions and implementing the mitigation strategy and it is envisaged this will function in a similar way to the RAMs scheme. Additional details will be included in the Reg 19 Version of the Plan.
NDLP2675	National Trust						
NDLP2675	National Trust						
NDLP3133	Stop Easton Park						
NDLP2685	National Trust						
NDLP2675	National Trust						
NDLP493	Alex Templet				Hedgerows - Use of Plastic	A comment suggesting that plastic tubing in hedgerows can lead to an issue of litter accumulation as they are not collected once the hedgerow out-grows them. The comment suggests that using biodegradable tubing for the replanting project would be preferable.	Noted.
NDLP1511	Natural England				Natural England - Policy Wording	Natural England welcome the inclusion of a section in the draft local plan on addressing the issues around visitor pressure on Hatfield Forest SSSI/NNR, they note that they are continuing to work with the LPA. They particularly focus on larger developments need to provide substantial greenspace in addition to contributing to the Strategic Access Management and Monitoring (SAMM) project. They also ask that	In Core Policy 38: The Natural Environment it states that all new development must protect priority and that all development resulting to the deterioration of irreplaceable habitats will be refused. UDC also note where the Priority Habitats are mapped. Uttlesford note that larger developments need to deliver the greenspace necessary in

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
						development should avoid adverse effects on designated sites under paragraph 175 and 179 of the NPPF. Also stating where Natural England Priority Habitats are mapped.	addition to contributing to the SAMM project and will continue to work with stakeholders to develop the Hatfield Forest Visitor Mitigation Strategy.
NDLP718	Kim Crow				Policy Wording	A number of comments relate to the policy wording and these include: <ul style="list-style-type: none"> • Disagrees with the concept of compensation being offered to ensure that developers don't avoid the need to provide mitigation • Questioning use of the word 'should' • It is suggested that the list of designated sites, habitats and species numbered i to iv contained within this policy does not appear to relate to any of the policy wording as drafted • It is suggested that the reporting and mitigation measures included in this policy should be split into separate component parts as it is 'hard to follow' • Chalk streams and traditional orchards should be added to the list of sites that require an ecological survey and impact assessment. 	Noted. The policy will be reviewed to consider if any clarification is needed. However, to be compliant with the NPPF the policy would need to include the option to provide compensation, but this would only be a last resort unless ecological harm could be avoided or mitigated. Traditional orchards and chalk streams fall under a priority habitat as designated by Natural England, therefore they fall under the list in paragraph 9.135.
NDLP719	Kim Crow						
NDLP4077	Salacia Ltd						
NDLP788	Richard Pavitt						
NDLP2744	Paula Griffiths						
NDLP3796	Mr Neil Reeve						
NDLP2278	Mulberry House Farms LLP						
NDLP1463	Environment Agency				Policy Wording - Environment Agency	The Environment Agency suggest that the wording 'with a view to protecting and where appropriate enhancing water dependent habitats' should be changed to 'with a view to protecting and should enhance water dependent habitats'. They also request that this section makes reference to specific protected species legislation – specifically the Natural Environment and Rural Communities (NERC) Act 2006 (habitats and species of principal importance in England). This includes a list of 56 habitats and 943 species identified as priorities.	Noted. Uttlesford will consider making this wording change in the Regulation 19 plan.
NDLP2675	National Trust				Preparation of Strategic Access Management and Monitoring (SAMMs) strategy	Comment from Natural England informing about the preparation of a Strategic Access Management and Monitoring (SAMMs) strategy	Noted. Uttlesford will continue to work with relevant parties to develop this strategy.
NDLP1807	Stansted MF Parish Council				Protection of Trees	Comment requesting stronger protection of existing trees.	The council has policy protecting existing veteran and ancient trees, Uttlesford will ensure that development proposals are compliant with NPPF paragraph 136.
NDLP788	Richard Pavitt				RAMS Zone of Influence	Comment stating that there has been discussions about removing Uttlesford from the Essex RAMS for a 'useful policy tidy-up'.	Noted, there are currently no plans to remove this designation from Uttlesford
NDLP3586	Ashdon Neighbourhood Plan Steering				Support	Comment requesting that the policy will be implemented.	Noted, Uttlesford will be able to implement these policies once the plan is adopted and will ensure that they are implemented in planning decisions moving forward.

Table 18 Core Policy 39: Green and Blue Infrastructure

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP2143	Mr David Kent				Environmental protection	The rep is concerned with the climate emergency and protecting the environment in the context of Uttlesford in regard its proximity to London, clearly delineated villages and chalk streams, which they believe have not been recognised. Planning measures proposed are generic to any settlement. Isolated developments block green routes for wildlife and begin urban spread along already congested roads. The opportunity to transition to net zero has been missed.	The Plan includes a policy on Watercourses and overall the spatial strategy and Plan objectives do seek to achieve a sustainable pattern of development to response to the climate emergency and protect the natural environment and rural nature of Uttlesford. This is demonstrated by placing proposed growth in existing settlements and through the development of the GBI Strategy identifying measures that will assist in protecting and enhancing the natural environment. Individual place chapters and site allocations bring the individual specific aspects to each settlement, such as site requirements for green space, woodland planting and consideration of nature areas, combined with the requirement to achieve 20% biodiversity net gain. The GBI Strategy is an overarching strategy that identifies habitat types and opportunities. Further work beyond the scope of the Local Plan is likely to be needed, perhaps through a Supplementary Planning Document. There are other policies in the Plan (including 5 covering energy) that look at green space, sustainable transport, biodiversity etc., all of which contribute to climate change mitigation and adaptation.
NDLP3377	Gladman				General comment	One respondent highlights that the acronym GBIS is not explained when it is first introduced, which should be easily amended and another highlights that proposals they have put forward can meet this policy by taking a landscape led approach.	Comments are noted and the acronym issue will be revised for the Reg 19 version of the Plan.
NDLP789	Richard Pavitt						
NDLP2898	Martyn Everett				Landscape	Audley park and the Cam Valley should be established as a 'living landscape area" with improved access and nature study facilities, and given protected status.	Uttlesford is supporting development of the Catchment Based Approach (CaBA) for the Cam Valley which will include supporting riparian and transitional habitats. This will be integrated into the GI Strategy and Plan.
NDLP1618	Anglian Water				Multifunctional GI	Three responses support and agree with the policy in connection with multi-functional benefits of GI, including Anglian Water (who also agree with the ongoing maintenance aspect), ECC and Cambridgeshire County Council.	Support for the policy on multi-functionality is noted. Anglian Water comment is noted. SuDS and LNRS are referred to policy. ECC and Cambridgeshire comments are noted and will be considered in the revision of the Reg 19 version of the Plan.
NDLP1831	Essex County Council					Anglian Water comments that the integration of SuDS and wider contribution to the Uttlesford Green and Blue Infrastructure Strategy and the LRNS will provide evidence for priority areas for nature recovery. ECC highlights how 'multifunctional GI' can assist in delivering other strategic objectives e.g. climate change, promoting active travel and enhancing mental and physical health, and biodiversity net gain. Cambridgeshire County Council recognise the benefits for surface water management.	
NDLP1374	N/A	Planning Cambridgeshire County Council					
NDLP1465	Environment Agency				Policy - Supporting text	The Environment Agency recommend that Stakeholder Engagement with the angling community is improved when development is adjacent to a river or existing large lake that already supports angling interests, as they are vital to the upkeep of GBI.	The inclusion of the angling community in consultations will be added to internal processes wherever possible and necessary.
NDLP1384	Historic England	Historic Environment Planning Adviser, East of England Historic England			Policy wording	Overall, there is broad support for the green and blue infrastructure policy, including from Historic England, the Environment Agency, MAG, Natural England and Sport England, however respondents make comments and suggestions on how it could be improved or revised. These include the following: Historic England suggests referring to the function that Green Infrastructure can have in enhancing and conserving the historic environment. Green Infrastructure can be used to improve the setting of heritage assets and improve access. Likewise, heritage assets can help	Support is welcomed. This is recognised as an important part of the landscape and asset to place making. SuDS are referenced in policy and their multi-functional benefits, however this could be expanded to include flood prevention and water quality and will be considered in future iterations of the policy. Biodiversity, BNG and LNRS is referred to the draft policy but the recommended text will be reviewed as part of the final draft of the plan for Reg 19. The Reg 19 Plan will be accompanied by a policies map. Green belt is
NDLP1476							

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP1520	Environment Agency	Planning Manager Sport England				contribute to the quality of green spaces by helping to create a sense of place and tangible links with history.	also covered in the policy. Appropriate development in the GB is covered under a separate policy. The policy does refer to All development but also major development, clarification is needed and consideration will be given to this for the Reg 19 version of the Plan. Connectivity is referred to for all, including people and wildlife within policy, no change needed. Simplification may be considered. Aviation safety in the development of GI in the vicinity of the airport will need to be added to the policy and in the GI Strategy proposals. The use of conditions does not need to be specified in policy as this is general planning practice. S106 contributions are referred to in policy as the main mechanism for funding and securing legal agreements. Consideration for the inclusion of protected lanes, green zones, and a protected verges policy will be crossed checked with the plan as a whole for check for its necessity as they may be covered by other proposed policies. Individual planning applications will have to comply with a range of legislation therefore there is no need to mention the hedgerow regs 1997 as amended on its own as this will be referred to along with other legislation as part of any planning application process and is not necessary as part of plan making. These will be checked against the Council's Playing Pitch Strategy and other updated leisure evidence to inform green infrastructure and the Plan as a whole and therefore a coordinated approach will be achieved.
NDLP2451	Natural England					The Environment Agency recommend that a line be added to the policy which states that SuDS and GBI is important for preventing the deterioration of and/or achieving enhancements of the ecological status of WFD designated water bodies and their associate elements. They set out the names of the water bodies covered by the WFD regulations affecting Uttlesford. They note that the GI Strategy acknowledges the responsibility the Council has to mitigate surface run-off for the ecological status of water bodies etc. and therefore, recommends this is reflected in policy. The EA provides a table with the Water Body Operational Catchment Overall Ecological Status. They highlight five surface water bodies negatively impacted by water industry sewage discharge and one driver for increased sewage discharges to be from increased inputs from surface water.	
NDLP3120	Anchor					Natural England suggest strengthening the policy wording so that it reads 'All proposals for green and blue infrastructure should be checked-against, delivered in line with, the design checklist in the Uttlesford Green and Blue Infrastructure Strategy and relevant sections of the Uttlesford's Design Code, together with Biodiversity Net Gain Guidance, the Council's Open Space Strategy and the LNRS.'	
NDLP3797	Higgins Group					Another representation suggests to ensure the policy is effective, it should be clarified that it is green and blue infrastructure as defined on the policy map.	
NDLP4043	Mr Neil Reeve					One response argues that appropriate development, in the green belt, where very special circumstances exist, can enhance the GBI network of the Green Belt. Features such as SuDS or habitat creation, which will enhance the GBI in the Green Belt can be funded through development and therefore reflected in the Plan. Examples at Little Hallingbury and Leaden Roding are offered such as multipurpose SuDS, public open space, and permeable surfaces.	
NDLP4078	MAG London Stansted Airport					Another rep suggests that GI should be extended to 'all' development. For example, plans for one or two houses, because small-scale developments can lead to hedgerow (and other natural asset) loss and require protection too. Furthermore, in sub vii) include in the concept 'connectivity' for 'wildlife corridors' as human connectivity. Essential to link spaces used by flora and fauna and finally, add CIL to secure through S106 (second last para).	
NDLP237	Salacia Ltd					MAG London Stansted Airport - Highlight that there is a requirement to safeguard aviation safety when considering any proposal that may attract birds as this could lead to an increase in bird-strike risk. Such proposals include areas of landscaping and the creation or modification of water bodies. Aviation safety must therefore be addressed in the determination of planning applications for such schemes and the Safeguarding Authority for Stansted Airport would need to be consulted as a statutory consultee in accordance with the legislative provisions set out in Circular 1 /2003 - Safeguarding Aerodromes, Technical Sites and Military Explosive Storage Areas. Proposals that adversely impact on aircraft safety should not be supported. Policy 39 should therefore include the need to consider the impact upon aviation and cross refers to the standalone airport safeguarding policy proposed.	
NDLP332	Mr Roy Warren					A response points out that the need for stewardship arrangements for not less than 30 years to cover maintenance, management, and funding arrangements as covered in the GI Strategy are not defined in policy and should be included. They suggest securing this by condition, as opposed to being submitted for approval as part of a planning application.	
	Mr Neil Hargreaves						

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
						One respondent wants the policy/plan to include protected lanes, green zones, and a protected verges policy. Also reference to the Hedgerow Regulations 1997 under which it is unlawful to remove or destroy certain hedgerows without permission from the LPA. Sport England - request that the policy is amended to require proposals for green and blue infrastructure to be checked against the Council's Playing Pitch Strategy as well as the other documents referenced given that playing pitches and other outdoor sports facilities form part of green infrastructure and therefore a coordinated approach is required.	
NDLP2451	Anchor				Viability	The policy requires major developments to be accompanied by an "acceptable GBI plan" including stewardship for not less than 30 years and an endowment sum to be provided. These additional costs have not been factored into the Viability Assessment and the policy is therefore not justified. The effectiveness of the policy is also questioned in relation to development typologies.	Comments are noted. The Reg 19 Plan will have a revised viability assessment and IDP to accompany it where these issues will be addressed.

Table 19 Core Policy 40: Biodiversity

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP1619	Anglian Water				Anglian Water - Policy Wording	Anglian Water - Supports the policy requirements for biodiversity net gain (BNG), and the links to the Green and Blue Infrastructure Strategy and emerging LNRS to guide any offsite requirements to ensure opportunities for priority areas for nature recovery can be realised. They have a long-term ambition to work with others to achieve significant improvements in ecological quality of catchments, beyond their 10% BNG commitment in their capital projects during AMP7 (from 2020).	Noted. Support Welcome
NDLP4044	MAG London Stansted Airport				Aviation safety	<p>MAG seeks a requirement to safeguard aviation activity when considering biodiversity, because any proposal that may attract birds could lead to an increase in bird-strike risk.</p> <p>Including areas of new landscaping and the creation or modification of water bodies.</p> <p>Where a development is located within the bird strike consultation area of on Officially Safeguarded Aerodrome (a 73km circle depicted on a safeguarding map), the local planning authority should consult the relevant aerodrome operator.</p> <p>Bird strikes pose a serious threat to aviation safety and any significant on-site enhancement that may increase the risk will be regarded as inappropriate by the CAA and aerodrome operators.</p> <p>Where enhancements are being proposed which may include features likely to attract water fowl and other birds within safeguarding areas the applicant is encouraged to engage with the Secretary of State for Defence (where this may affect a military aerodrome), the relevant aerodrome operator, and the local planning authority to understand the safeguarding considerations for their development before submitting the planning application. This is to ensure that any issue can be addressed in the design and detail of the proposed development.</p>	The Council note MAGs comments on bird strikes and the risk to aviation and these will be taken into consideration when amending the Reg 19 version of the Plan.

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP3445 NDLP2264 NDLP3121 NDLP3261 NDLP4079 NDLP4165 NDLP982 NDLP1010 NDLP4044 NDLP60 NDLP352 NDLP3624	Bloor Homes (Eastern) Landsec Higgins Group Weston Homes Plc Salacia Ltd Threadneedle Curtis Limited Mary Powe Daniel Jones MAG London Stansted Airport Mr Neil Reeve Mrs Jane Sharp Hill Residential Ltd	 Director Richstone Procurement Limited Director Silverley Properties Ltd	Mary Power Sophie Pain		BNG	<p>"A number of general comments were received concerning BNG provision. These include:</p> <ul style="list-style-type: none"> • Relating to the Plan seeking 20% BNG rather than 10% as set out in national policy. Some reps supported this, including the EA and Natural England and others objected. One representation referred to the Government's opinion that 10% strikes the right balance between the ambition for development and reversing environmental decline. • MAG London Stansted Airport - the percentage increase would need to be evidenced including the local need and opportunities for a higher percentage; viability for development; and policy implementation. • As with others above, most additional reps contest the delivery of BNG at 20%, as it's over the minimum requirement of 10%, and is not evidenced or justified. One rep suggesting the evidence base is out of date and another noting that it did not account for the Metric 4 that BNG calculations are now required to be assessed against. • One rep highlights the need to consider the Plan as a whole. Collectively the policies place an unnecessary burden on sites that will impact on viability. • Another rep suggests that the BNG proposal will affect the developable area of sites. • One comment suggests that the Council should set out where 20% is not deliverable that it will seek to negotiate the level that can be provided over the 10% minimum required by the Environment Act 2021. • Another comment suggested that offsite biodiversity mitigation is nonsensical and that it would be impossible to move habitats. <p>"</p>	<p>Mandatory Biodiversity Net Gain came into effect on 12th February 2024. Dates of mandatory BNG introduction will be updated. From that point, most developments will need to demonstrate a 10% biodiversity enhancement for all watercourses, terrestrial habitats and hedgerows, legally secured for a minimum period of 30 years. This agreement will include who is responsible for what. 10% BNG is the point at which biodiversity enhancements become meaningful at a landscape scale. Local authorities are encouraged to require more than 10% where strong evidence of need through past habitat and species losses and of feasibility is provided. UDC is currently collating evidence to support the requirement of 20% Biodiversity Net Gain and has considered the issues raised by Natural England. Biodiversity Net Gain will again be required for watercourses, hedgerows and other terrestrial habitats. These measures, in addition to the emerging Essex Local Nature Recovery Strategy, will ensure that biodiversity enhancements bring meaningful enhancement. A Biodiversity Net Gain Supplementary Planning Document will be published in due course. The existing developer contributions SPD will be reviewed once the Plan is adopted.</p> <p>The Plan will be supported by an Infrastructure Delivery Plan and a Viability Assessment at Reg 19 that will consider the cumulative requirements of the Plan on development in the district to ensure deliverability and viability. BNG and the developable area on proposed allocations will be negotiated on a site-by-site basis. However, a masterplan approach is provided which takes site characteristics into consideration. One way to remedy the smaller or larger land taken for housing to accommodate BNG is to have higher density development, which is still in context with local character. The Uttlesford Design Code will be published with more detail. This will ensure that housing needs and BNG requirements can be achieved whilst making best use of land.</p> <p>Offsite biodiversity mitigation does not refer to moving wildlife habitats from one site to another, although this is possible, at great cost and as a last resort. Off-site biodiversity is a term in planning used to refer to where developers will make financial contributions to enable projects to be undertaken off a development site in the interests of BNG. This would be in addition to any green space requirements that are needed on site as part of development proposals.</p>
NDLP3727	CH Gosling 1965 Settlement				BNG - Land available	Response draws attention to the extent of available land within the ownership of The Trustees of the CH Gosling 1965 Settlement and that development of the site the subject of these representations could be accompanied by suitable proposals for onsite biodiversity net gain.	Comments are noted. The Council may do further engagement on green sites for off-site BNG in the future.
NDLP4044 NDLP3099	MAG London Stansted Airport				BNG - viability	<p>A number of comments raised issues relating to viability and deliverability of the BNG proposed policy. These included:</p> <ul style="list-style-type: none"> • the lack of justification for going above national policy requirements. • lack of consideration in viability proposals for non-residential development including for employment proposals. 	Comments are noted. Mandatory Biodiversity Net Gain came into effect on 12th February 2024. From that point, most developments will need to demonstrate a 10% biodiversity enhancement for all watercourses, terrestrial habitats and hedgerows, legally secured for a minimum

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP612	Ropemaker Properties Limited	Group Planning Associate The Planning Bureau on behalf of McCarthy Stone	Natasha Styles			<ul style="list-style-type: none"> • Some comments suggest the Council has underestimated the cost of delivering 20 % BNG. • The assumption that 20 % BNG relates to 2.86 % of the build cost is questioned. • It is suggested that the BNG policy could threaten the Councils affordable housing policy. • several other comments supported the policy. 	<p>period of 30 years. 10% BNG is the point at which biodiversity enhancements become meaningful at a landscape scale. Local authorities are encouraged to require more than 10% where strong evidence of need through past habitat and species losses and of feasibility is provided. UDC is currently collating evidence to support the requirement of 20% Biodiversity Net Gain. Biodiversity Net Gain will again be required for watercourses, hedgerows and other terrestrial habitats. These measures, in addition to the emerging Essex Local Nature Recovery Strategy, will ensure that biodiversity enhancements bring meaningful enhancement. A Biodiversity Net Gain Supplementary Planning Document will be published in due course.</p> <p>A viability assessment will be updated for the Reg 19 Plan and comments are noted that relate to viability issues for the plan and BNG, such as the inclusion of non-residential uses, the impact on developable areas of land; the cost of greenfield v brownfield BNG delivery and affordable housing; comparisons with extra care homes, affordable housing and sheltered accommodation; and concerns about other infrastructure provision requirements if BNG is a requirement, other services may be threatened such as affordable housing. The Reg 19 Plan will be accompanied with further evidence to justify the 20% BNG requirement and individual site masterplan work has been undertaken to justify the requirements on each proposed strategic allocation. These will be viability tested through the Viability assessment too. The Plan is accompanied by an employment evidence base, and all forms of development will be required to provide BNG.</p>
NDLP2452	Natasha Styles						
NDLP3378	Anchor						
NDLP4079	Gladman						
NDLP3095	Salacia Ltd						
NDLP1624	Segro						
NDLP3832	Chelsteen Developments Limited						
NDLP3946	Hillrise Homes Limited						
NDLP3149	Michael and Sarah Tee						
NDLP4099	Smith Bros						
	S Payne						
NDLP4321	Vistry Group			Bidwells			
NDLP1464	Environment Agency				EA - BNG	Biodiversity Net Gain The reference on page 153 to BNG becoming live in November 2023 needs to be updated to January 2024 based on the recent date change. We are pleased to see an ambitious target of 20% for Biodiversity net gain.	Noted. A correction will be made as indicated.
NDLP1464	Environment Agency				EA - Environment	Environment Agency - No specific mention of the importance of using native species with local providence in planting schedules, which is important for restoration to ensure the local, native ecosystem that is restored is in keeping with its surroundings.	Noted. A correction will be made as indicated.
NDLP2958	Mike Tayler				Environment	<p>A number of general comments were received relating to environmental matters. These included:</p> <ul style="list-style-type: none"> • One comment suggested that the maps (Fig 7.2) were confusing and vague regarding the proposed school site, existing green spaces and corridors, proposed link roads and questioned whether green sites had been proposed through the call for sites citing Chalky Meadow. They highlight a well-used green corridor from Copthall Lane, to Walnut Tree Meadow which has now rewilded with significant biodiversity developing; Welly Boot Wood owned by the Parish Council and further woods and open 	<p>Comments noted.</p> <p>The maps will be updated for inclusion in the Reg 19 Plan, along with reference to native species being added to the policy.</p> <p>Given the rural nature of Uttlesford, it is impossible to meet the identified housing need without some incursion onto agricultural land, but the Spatial Strategy has sought to support as sustainable pattern of development as possible. Mandatory Biodiversity Net Gain came into effect on 12th</p>
NDLP1765	Robert Bass						
NDLP350	Kelly Osborne						
NDLP1159	Richard Hughes						

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP2299 NDLP2509 NDLP1107 NDLP2041	Deborah Bryce Widdington Parish Council Kim Crow Douglas Kent					<p>farmland.</p> <ul style="list-style-type: none"> • One representative believes it is a grand idea to protect and enhance biodiversity, however some areas will suffer because of the proposed development of housing, much of which will be on prime agricultural land, particularly in areas around Thaxted, Great Dunmow and Newport. • One rep is concerned about the decline in biodiversity in the local natural environment in more general terms and others refer to the importance of protecting Chalk Streams. • One comment refers to the UN Convention on Biological Diversity dedicated to promoting sustainable development. It highlights that they talk about this being more than plants and animals and their ecosystems and that its about '... food security, medicines, fresh air and water, shelter, and a clean and healthy environment in which to live.' • One rep is concerned that UK Priority Habitat i.e. "biodiversity action plan sites" such as ponds, woods, orchards, brownfield sites, hedgerows, meadows, are excluded from the habitat survey. They state/claim that 75% of all habitats have been lost in the last 30 years. Priority Habitats need to be recognised in policy. • Another rep highlights that Meadows are one of the rarest habitats in the UK, with 97% being lost in Britain since World War II according to English Heritage. https://www.english-heritage.org.uk/learn/conservation/gardens-and-landscapes/meadowconservation/ 	<p>February 2024. From that point, most developments will need to demonstrate a 10% biodiversity enhancement for all watercourses, terrestrial habitats and hedgerows, legally secured for a minimum period of 30 years. This agreement will include who is responsible for what. 10% BNG is the point at which biodiversity enhancements become meaningful at a landscape scale. Local authorities are encouraged to require more than 10% where strong evidence of need through past habitat and species losses and of feasibility is provided. UDC is currently collating evidence to support the requirement of 20% Biodiversity Net Gain and has considered the issues raised by Natural England. Biodiversity Net Gain will again be required for watercourses, hedgerows and other terrestrial habitats. These measures, in addition to the emerging Essex Local Nature Recovery Strategy, will ensure that biodiversity enhancements bring meaningful enhancement. A Biodiversity Net Gain Supplementary Planning Document will be published in due course. UK priority habitats have been included in the evidence base in preparing the Local Plan. All habitats and species are covered in the policy regarding their protection and enhancement. Meadows are not specifically mentioned as the policy seeks to cover ALL habitats and species. However, the supporting text could be enhanced to include both priority habitats and wildflower meadows as these are of particular importance in Uttlesford.</p>
NDLP2278 NDLP3849	Mulberry House Farms LLP Rosconn Strategic Land Limited				General comment	<p>Some general comments were received on biodiversity. These were:</p> <p>In paragraph 9.144 of the draft Local Plan (last sentence), a word might be missing, should it read as follows: New homes should include bat, swift and bird boxes integrated into the fabric of the building, green roofs and walls as appropriate, insect pollinator planting and hedgehog permeable fencing as well as making provision for protected species such as badgers' pathways and both terrestrial and aquatic habitats for great crested newts.</p> <p>Two reps appear to be referring to potentially live planning applications and therefore these will need to comply with the Environment Act minimum statutory requirement by delivering at least 10% net gain in biodiversity. This emerging policy expectation of 20% BNG should not be triggered provided a future scheme is implemented in substantial accordance with any Outline Consent.</p>	<p>Comments are noted and will be considered in the review of the Plan for Reg 19.</p>
NDLP2008	Home Builders Federation				HBF - BNG	<ul style="list-style-type: none"> • Home Builders Federation – echoed comments from MAG – they do not consider the requirement to be sound. Citing the need for it to be justified and when considered in combination with other policies the impact on the deliverability of the local plan. They acknowledged the policy had been assessed in the Viability Assessment but no evidence for the additional 10% net gain in biodiversity in Uttlesford and therefore is unsound. 	<p>Comments are noted and will be considered in the review of the Plan for Reg 19.</p>
NDLP1522	Natural England				Natural England - BNG	<p>Natural England welcomes the inclusion of a specific policy on BNG and notes the District's ambition for a 20% target. Any target above the mandatory minimum should be achievable and evidence based. The Local Authority may need to undertake additional work to justify this higher target at examination. This is likely to include evidence regarding the local ecological need for higher targets, the available supply and demand of</p>	<p>Noted. Support Welcome. The Council will continue to work with NE and other stakeholders to develop further evidence and refine the policies for inclusion in the Reg 19 Plan.</p>

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
						<p>biodiversity units in the district and the financial impact to developers.</p> <p>The Plan's approach to BNG should be compliant with the mitigation hierarchy, as outlined in paragraph 175 of the NPPF. Policies and decisions should first consider options to avoid adverse impacts on biodiversity from occurring. When avoidance is not possible impacts should be mitigated and finally, if there is no alternative, compensation provided for any remaining impacts. Biodiversity net gain should be additional to any habitat creation required to mitigate or compensate for impacts. Losses and deterioration of irreplaceable habitats (e.g. ancient woodland) cannot be accounted for using the BNG metric and would require bespoke compensation. An initial list of irreplaceable habitats has been published ahead of a further consultation expected in 2024: Irreplaceable habitats and BNG .</p>	
NDLP1522	Natural England				NE - General Comment	<p>In paragraph 9.144 of the draft Local Plan (last sentence), there appears to be a word missing as follows (shown in bold): New homes should include bat, swift and bird boxes integrated into the fabric of the building, green roofs and walls as appropriate, insect pollinator planting and hedgehog permeable fencing as well as making provision for protected species such as badgers' pathways and both terrestrial and aquatic habitats for great crested newts.</p>	Comments are noted and will be considered in the review of the Plan for Reg 19. This may be referring to a live application and if so is not applicable to the Local Plan.
NDLP1522	Natural England				NE - Policy Wording	<p>Local Authorities should use existing strategies and baseline information to inform these areas of "strategic significance" and it is recommended that this is given further consideration during the next iteration of the Local Plan. The national Nature Recovery Network has been developed by Natural England to inform the Local Nature Recovery Strategies that are currently being developed to support the delivery of BNG in January 2023 and the recovery of biodiversity in line with commitments in the Environment Act 2021 Land for inclusion within the Nature Recovery Network is currently being identified by the Essex Local Nature Partnership to reconnect fragmented habitats. Future iterations of the draft Uttlesford Local Plan should take account of the Greater Essex Local Nature Recovery. Strategy (LNRS) and seek to avoid including development allocations that would further fragment existing habitats of biodiversity value, such as Ancient Woodland or species rich grassland. We would suggest amending the final paragraph of Core Policy 40 as follows (changes in bold). Where the required delivery of biodiversity net gain is not possible on site, gain should be delivered as close as possible on projects identified in the Green and Blue Infrastructure Strategy or as identified in the County's emerging Nature Recovery Network Local Nature Recovery Strategy. References in the draft Local Plan to the Essex Biodiversity Project should be removed, as this project is no longer live. In paragraph 9.144 of the draft Local Plan (last sentence), there appears to be a word missing as follows (shown in bold): New homes should include bat, swift and bird boxes integrated into the fabric of the building, green roofs and walls as appropriate, insect pollinator planting and hedgehog permeable fencing as well as making provision for protected species such as badgers' pathways and both terrestrial and aquatic habitats for great crested newts.</p>	Noted. Support Welcome. The Council will continue to work with NE and other stakeholders to develop further evidence and refine the policies for inclusion in the Reg 19 Plan.
NDLP4044 NDLP2644	MAG London Stansted Airport Greater Cambridge	Planning Policy Manager Greater			Policy wording	<p>A number of comments were received relating to the policy wording. These include:</p> <ul style="list-style-type: none"> • MAG London Stansted Airport - Planning applications will need to provide sufficient detail of habitat enhancements to enable proper consideration of the impact on aviation safety and the Safeguarding Authority for Stansted Airport needs to be consulted as a statutory consultee. The policy should be amended to include consideration of the impact upon aviation and cross 	Comments noted. Key stakeholders will continue to be consulted and engaged as part of the process to develop the next stage (Reg 19) version of the Plan. The policy will be amended to reflect aviation safety and or cross reference to other applicable policies in the Plan. The Plan has a monitoring framework and BNG will be a required element of this under the Environment Act. The

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP2686	Shared Planning Service	Cambridge Shared Planning Service				refer to the standalone airport safeguarding policy also proposed in our reps.	Council is also working closely with Essex County Council on its LNRS and developing its own GBI Strategy. Areas of strategic significance should be identified in these and if not will be considered for the Reg 19 version of the Plan.
NDLP801	National Trust					• Anglian Water - Supports the policy requirements for biodiversity net gain (BNG), and the links to the Green and Blue Infrastructure Strategy and emerging LNRS to guide any offsite requirements to ensure opportunities for priority areas for nature recovery can be realised.	Reference to the Essex Biodiversity Project will be removed.
NDLP790	Mike Priaulx					• Home Builders Federation – Comment that if 20% BNG requirement is retained the council need to set out that where 20% is not deliverable it will seek to negotiate the level that can be provided over the 10% minimum as required by the Environment Act 2021. recommend amending policy wording as follows: "...measured using the latest metric required by DEFRA". In the same paragraph as 20% BNG they highlight reference to creating sites of greater biodiversity or geological value is made. BNG refer to habitats and therefore no need to improve geological value and therefore question its relevance in this paragraph and recommend reference to geological value in this sentence is removed.	Reg 18 draft Plan supporting text includes reference to swift boxes and other species. The policy refers to species and habitats. This ensures that all types of species are covered in applications, not just birds, bees and bats. The Plan should be read as a whole and other policies in the Plan will need to be complied with when any scheme is submitted to the Council for consideration.
NDLP3445	Richard Pavitt					• Suggesting that more detail is required to ensure that installed bird boxes are long-lasting, low maintenance, and relevant to the local area and target species, and an appropriate number and location.	The standardization of buffers along watercourses will be considered along with lighting requirements in design standards for habitat areas and species. This may be best under another policy in the Plan.
NDLP1586	Bloor Homes (Eastern)					• Highlighting a potential conflict with the provision under CORE POLICY 35 for a 15m minimum protection zone alongside chalk streams. Where this biodiversity policy seeks in 10m minimum buffer zones alongside wetlands and watercourses. They suggest a standard 15m buffer as all wetlands / watercourses need special protection.	The Council will check the use of the Metric with Natural England, as necessary, and amend the policy where appropriate.
NDLP2008						• Three comments suggest that to ensure the Plan is future proof it is recommended that the referencing of specific metrics in policy be avoided. Rather than state "metric 3.1 or successor" it would be more appropriate to state "latest metric required by DEFRA" to avoid confusion.	
NDLP2452	David Perry					• Some respondents made comments in relation to bat, bird and bee bricks and general environmental improvements of planning application schemes. They suggest that a minimum standard for all development should be set.	
NDLP3121	Home Builders Federation					• Other reps raise concerns about / are against the requirement for 20% BNG (exceeding national policy, guidance for min 10%). One highlighting issues for off-site biodiversity provision, that there should be policy exemptions; three suggesting that 20% should be expressed as an aspiration in policy, one adding that it will be a beneficial material consideration in the overall planning balance; one stating the level of information required at each stage of the process (application, prior to commencement etc.) should reflect, and not exceed, national guidance.	
NDLP3347						• Some reps refer to the 30-year maintenance period, one noting that it would be onerous. One comment referring to, the policy should refer to 'who' is carrying out the maintenance	
NDLP3624	Anchor						
NDLP4079	Higgins Group						
NDLP4165	Welbeck Strategic Land						
NDLP454	Hill Residential Ltd	Planning Director Durkan Homes					
NDLP936	Salacia Ltd						
	Threadneedle Curtis Limited						
NDLP4173	Kim Rickards						

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP2510							
NDLP2511	Catesby Estates Ltd (Stacey Rawlings)						
NDLP95							
NDLP3095	Saffron Walden Town Council						
NDLP1624							
NDLP3832	Widdington Parish Council						
NDLP3946	Widdington Parish Council						
NDLP4099	Graham Knight						
	Segro						
	Chelsteen Developments Limited						
	Hillrise Homes Limited						
	Michael and Sarah Tee						
	S Payne						

Table 20 Core Policy 41: Landscape Character

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP1146	Harriet Burrow				Ashdon NP landscape evidence and allocation	Comments suggesting that the plan does not consider the landscape of Ashdon properly and that the highly sensitive landscape of Ashdon is not considered when allocating housing there.	Noted. The Reg 18 Local Plan doesn't allocate any sites at Ashdon but identifies a housing requirement based. Any allocations would be subject to a site selection process that would need to consider appropriate constraints. However, the Settlement Hierarchy is being reviewed and so may lead to revisions.
NDLP3587	Ashdon Neighbourhood Plan Steering						

NDLP1192	Ashdon Parish Council						
NDLP1198	Ashdon Parish Council						
NDLP3676	Newport Parish Council				Broad Support for Landscape Character policy	Newport Parish Council support the statement that "The open nature of the landscape and the higher areas are particularly sensitive to change. Other comments provide broad support for the policy, also states that S02, S03, & S05 each must be not be diminished.	Noted. Support welcome.
NDLP604	Stephanie Gill						
NDLP1539	Chrishall Parish Council				Chrishall evidence inclusion	Comment suggesting that Uttlesford should consider evidence regarding Chrishall's special landscape value.	Noted. As a Smaller Village, there is no development proposed at Chrishall other than limited infill development, subject to other relevant Development Policies being adequately met.
NDLP3348	Welbeck Strategic Land				Coalescence	Comment suggesting that coalescence is not a landscape consideration and should be omitted from core policy 41.	The Council are content that Coalescence relates, at least in part, to landscape impact as development could lead to coalescence could impact the landscape, character, separate identifies of settlements etc.
NDLP756	Virginia Barlow						
NDLP2347	Richard Haynes				Comprehensive NP evidence.	Comment suggesting that evidence used in Neighbourhood Planning is more comprehensive than the one used in the regulation 18 plan, and therefore does not address comprehensively the question of view sensitivity	The Local Plan needs to address 'strategic' matters that affect the district as a whole and any evidence should be fit for this purpose, but it should also be consistent. Neighbourhood Planning evidence may sometimes be helpful to inform a Local Plan process but will often be prepared with a different purpose in mind. Any allocations to come forward at the Larger Villages can be taken forward by Neighbourhood Plan processes with the Parishes leading, if they wish to, and on that basis the evidence would be the responsibility of the parish.
NDLP2559	Geoff Bagnall						
NDLP1525	Natural England				Cross reference of GI policies to the LCA	Comment requesting that the LCA should be referenced across the GI policies to ensure that planning GI will recognise the intrinsic character and beauty of the wider countryside.	Noted. Cross Reference to be added in Reg 19 version of Plan.
NDLP1385	Historic England	Historic Environment Planning Adviser, East of England Historic England			Historical Factors	Comment highlighting that the policy should be expanded to consider the significance of historical landscapes in regard to the role in understanding the landscape. The comment also states that , many tracks, green lanes, field boundaries and settlement patterns are remnants of past use and provide evidence of how the landscape has evolved over time.	Noted. The Local Plan Landscape Evidence does consider the historical value of landscape, but this matter will be considered for possible inclusion in the policy.
NDLP2347	Richard Haynes				Locally Valued Landscapes	Uttlesford should consider if there are any locally valued landscapes. In accordance with NPPF paragraph 174(a). Local designations could be used for this.	Noted. It is not considered that there are any landscapes that meet the NPPF paragraph 174 criteria.
NDLP2559	Geoff Bagnall						
NDLP1525	Natural England						
NDLP941	Sarah Brewin						
NDLP3311	Michael Johnstone	Cheergrey Properties			Need to revisit Allocations	The Comment provides various details to justify the statement that the proposed allocations need correcting.	Noted.
NDLP941	Sarah Brewin				Omission of general countryside policy equivalent to S7, ENV2 and ENV5	Comments noting that a substantial policy that follows the previous local plans policy S7, ENV2 and ENV5 has not been included in the new draft local plan.	The Draft Local Plan includes a policy that defines open countryside as areas outside the built form of settlements or settlements that are not included in the Settlement Hierarchy (Core Policy 3). It states that in the open countryside, development will not be appropriate unless specifically supported by other relevant policies as set out in the development plan or national policy. It could be argued that the new policy provides a clearer and stronger level of protection against development in the Countryside. Landscapes of particular significance are
NDLP2347	Richard Haynes						
NDLP2559	Geoff Bagnall						
NDLP1714	Thaxted Parish Council						
NDLP2358							

	Richard Haynes						identified in the LCA and LSA and will be considered in planning decisions.
NDLP3348	Welbeck Strategic Land				Policy wording	Comments arguing that core policy 41 is inconsistent with national policy and is unreasonable to say that all major development must submit a Landscape and Visual Impact Assessment (LVIA). They argue that this is only necessary when the development has a significant impact on landscape character or visual effect on the existing landscape or townscape setting. They argue that the blanket approach might be too onerous on the applicant and that the definition of major development should be raised to 100 dwellings and the policy should adopt a tiered approach consistent with national policy. Other comments include: •“Development proposals...” page 155 Add “, including for roads,” •page 155 Rather than ‘expected to’ change to ‘Development proposals MUST’ paragraphs 1 and 2. •point iv page 155 Developments should be porous and fluid, enabling ease of access and integration of each except where the historic rural identities of settlements should be preserved. •“All major development proposals...” page 156 How are “major development proposals” and “smaller development proposals” defined? Who determines whether a smaller proposal will require a landscape and visual impact assessment? Specify UDC will determine where LVIA is required and NOT the developer.	Noted. Major Development is defined in planning regulations and reference can be added for this. However, consideration can be given to raising the threshold above 10 dwellings to 100 dwellings, albeit with the caveat retained that LVIA may be required on smaller schemes were this is considered appropriate. Consideration can be given to changing the word ‘expected’ to ‘should’ – this will be reviewed.
NDLP4174	Saffron Walden Town Council						
NDLP4080	Salacia Ltd						
NDLP4175	Saffron Walden Town Council						
NDLP4176	Saffron Walden Town Council						
NDLP4177	Saffron Walden Town Council						
NDLP1525	Natural England				Policy Wording - Natural England	Natural England suggests the following changes to Core Policy 41: 'Landscape Character' , shown in bold below. Development proposals will be expected to preserve the character and appearance of the landscape, the nature and physical appearance of ancient landscapes, or geological sites of importance through the restoration, management and enhancement of existing areas, features or habitats and where appropriate the creation of new ones, including the planting of woodlands, trees and hedgerows. Development will be expected to respect reflect and enhance local landscape character in accordance with the applicable guidelines to protect and conserve, manage and plan landscapes outlined for each landscape character area within the Uttlesford Landscape Character Assessment (2023) , particularly in settlement edge locations and rural areas. Development should, in the first instance seek to avoid damage to local landscape character, and must secure appropriate mitigation where damage to local landscape character cannot be avoided. Proposals will not be permitted if they would: i. cause an unacceptable visual intrusion into the open countryside ii. be inconsistent with local character iii. introduce disturbances to areas with a high level of tranquillity iv. cause coalescence between settlements v. harm views to distant landmarks and landscapes of interest (wording open to interpretation define 'landscapes of interest' — are these 'valued' landscapes?) vi. harm the setting of natural and built landmark features, and vii. reduce the historic significance of the landscapes. All major development proposals must be supported by a Landscape and Visual Impact Assessment.	Noted. Consideration will be given to updating the policy informed by the Natural England comments.
NDLP1525	Natural England				Smaller Development	Comment stating that small development proposals may also require an assessment to be submitted alongside the assessment.	Noted.
NDLP700	Nigel Wood				Whole Settlement	Comment requesting that the whole settlement area is considered when planning for landscape character.	In development decisions landscape character will be considered in all cases, but the assessment of landscape character will often be most relevant at settlement edges as they may be most sensitive to change. Areas within existing settlements will typically have a more urban feel that has already been subject some form of historical change.

Table 21 Core Policy 42: Pollution and Contamination

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
					General comments	Two comments refer to the potential impact of one of the proposed development sites (at Great Dunmow) to pollution in general terms rather than relating to the policy per se, but they do suggest that the building works will have a detrimental impact as developers are reported to not take care of the locality where they are working and this could relate to CP42. Another comment requests that examples of 'polluting activities' that are necessary as the policy refers to these being minimised.	Noted. Consideration can be given to amending the policy to also consider how works should be carried out on any sites, even those that do not relate to contamination per se as they can be risks associated with development activity impacting the locality. A wide range of industrial, agricultural, business activities that are essential for our economy to function successfully may create some pollution, albeit they have to operate within appropriate regulatory limitations. The policy is designed to inform how planning decisions are taken that relate to any such operations. Furthermore, Paragraph 9.152 cites some of the sources of pollution. Necessary activities include inter alia industrial, commercial, and domestic activities. Core Policy 42 states the major types of pollution.
NDLP1534	Chrishall Parish Council				Implementation	Currently no penalty for clearing sites of vegetation by spraying toxic of chemicals prior to submission of planning applications. Chrishall Parish requesting inclusion of a requirement in the Local Plan to ensure that no land can be cleared in prior to submission of a planning application.	The Local Plan can only include policies that relate to the determination of planning applications for development although there may be other regulatory requirements than control land uses not related to planning. An example might be TPO (Tree Preservation Orders) that provide protection for designated trees where legal action can be taken if they are damaged, etc.
NDLP1220 NDLP1227 NDLP2747	Mr Richard Walford Mr Richard Walford Paula Griffiths				Light Pollution	A number of comments refer to Light Pollution, including: • Replacement of LP2005 Policy Gen 5 – Light pollution by Core Policy 42 – Pollution and Contamination is disputed and states that Light Pollution is barely mentioned in Core Policy 42. • Four additional policy criteria are proposed: level of lighting and period of use; means of minimising glare and light spillage; use of earth banks and landscaping to minimise light spillage and use of light fittings light fittings with appropriate environmentally beneficial technology. • Recent major development east of Saffron Walden has had major adverse impact on night skies from 3 miles away.	Noted. CP42 will be updated for inclusion in the Reg 19 version of the plan to include greater detail relating to light pollution along the lines of the previous LP policy. Night skies are very important in the District, although any recent permissions will have been informed by the existing Light Pollution policy.
NDLP791 NDLP4081	Richard Pavitt Salacia Ltd				Policy Wording	It is suggested that points (i) and (ii) refer to/cross index with relevant other core policies - for example, in relation to water pollution. It is also stated that the requirements should not apply to all sites, as not all sites relate to any noise pollution.	Consideration will be given to adding cross referencing, although the Development Plan should be considered as a whole and it won't be possible to include all relevant cross references within the Plan. The policy applies to any development that may lead to polluting or related matters - if a development does not, for example, generate noise, it is suggested this will be a relatively straightforward matter to deal with and can be discussed through the application and/ or pre-app stage.
NDLP1470	Environment Agency				Policy Wording - Environment Agency	Core Policy 42 does not encourage redevelopment of brownfield land in line with Part IIA of the Environmental Protection Act 1990. Recommended Core Policy 42 wording revision to include," Excavated materials recovered on a development site via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste Development Industry Code of Practice (DoWCoP) subject to certain conditions being met." Recommended Core Policy revision to refence Definition of Waste: Development Industry Code of Practice and The Waste Management page on gov.uk.	Noted. Core Policy 42 should include the Council's support of previously developed land (Brownfield land) and encourage reuse of excavated materials from a development site. The site waste should be cross referenced to Core Policy 1: Climate Change & Sustainability Statement.

Table 22 Core Policy 43: Air Quality

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP1274 NDLP462	Mr Robert Jones Mrs Margaret Hudson				Air Quality - Monitoring	The comment refers to the evidence paper that does not cover off the Airport but is focused on Saffron Walden air quality issues. It is questioned if there is a lack of consideration of monitoring other areas e.g. under flightpaths and near M11 junctions. A related comment question who carries out the monitoring.	The evidence work focuses on Saffron Walden as this has been the only area in Uttlesford identified as an Air Quality Management Area (AQMA) although as air quality in this area has improved, this designation is being removed. On this basis, as the study was only concerned with the potential impact on any AQMA's, it did not seek to consider any other areas. The monitoring is carried out by the Council's Environmental Health Team.
NDLP4082 NDLP4178 NDLP4179	Salacia Ltd Saffron Walden Town Council Saffron Walden Town Council				Air Quality - Policy wording	Comments relating to the Policy Wording include: Policy supported but clarity is required of instances when and in what circumstances a relevant assessment will be required, and Mitigation measures must be in place prior to completion of development.	The Council is satisfied the policy is sufficient clear and provides for some flexibility to be considered at application and ideally pre-app stage. The delivery of any mitigation measures will be considered on a case by case basis as part of the individual application. Reference can be made to the UDC guidance or its successors.
NDLP2748	Paula Griffiths				Air Quality - Saffron Walden AQMA	Request to reconsider Saffron Walden AQMA designation in view of weekday morning traffic fumes along Church Street.	The intention is to revoke the Saffron Walden AQMA in 2023/2024 since for there have been no Nitrogen Dioxide (NO2) annual mean exceedances and for 6 years. The Council will develop the Saffron Walden Clean Air project to tackle pollution and improve opportunities for sustainable travel.
NDLP3523	Takeley Neighbourhood Plan Steering Group				Air Quality - Stansted Airport	Poor air quality is associated with a number of adverse health impacts especially on the most vulnerable in society. Based on the UDC Air Quality Annual Status Report (May 2023) , it can be concluded that air quality is good. The increase of passengers at Stansted Airport from 27 mppa to 43 mppa will result in increased air traffic density both airport and higher local residential and industrial activity thereby resulting in the significant worsening of noise pollution and air quality. Querying rationale of locating new schools next to the A120 and close to the airport as any of the new development which is at the epicentre of the increased noise and pollution impact.	In line with the requirements of Core Policy 43 – Air Quality and Core Policy 44 – Noise, appropriate air quality and noise assessment will have to be undertaken to ensure that the proposed development will have to demonstrate that it meets the national air quality objectives and for noise that it has been demonstrated that all appropriate mitigation will be undertaken to ensure that noise impact will be acceptable.

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP3678	Newport Parish Council	Newport Parish Council			Air Quality - Traffic Noise	Although Newport Parish Council agrees with the policy, it will not be possible to comply with the policy because they contend that proposed development in Newport is within 100 metres of the M11 central reservation and also that existing pollution concerns at the B1383/ Wicken Road junction would not comply with the policy.	In line with the requirements of Core Policy 43 – Air Quality and Core Policy 44 – Noise, appropriate air quality and noise assessment will have to be undertaken to ensure that the proposed development will have to demonstrate that it meets the national air quality objectives and for noise that it has been demonstrated that all appropriate mitigation will be undertaken to ensure that noise impact will be acceptable.
NDLP1472	Environment Agency				CP 42 Pollution and Contamination - Environment Agency	The section should reference that development sites (especially brownfield sites) may have land & groundwater affected by contamination which requires remediation. Groundwater and land quality assessments to follow framework outlined in Land Contamination Risk Management (LCRM). Paragraphs 9.152, 9.153 and 9.154 to consider and have regard to: NPPF paragraphs 174 and 184; •Environmental Agency's approach to Groundwater Protection in proposals they are likely to object to in principle; •Developers should be required to submit Preliminary Risk Assessment with planning application on potentially contaminated land; Developers required to ensure sites are suitable or made suitable for intended use; and •Require developers to prevent discharges to ground through land affected by contamination.	Noted. Consideration will be given to making additional references to national policy as indicated.
NDLP2393	National Highways				Impact on SRN - National Highways	If there were to be air quality exceedances due to proposed development's proximity to SRN might require mitigation measures such as permanent speed restrictions. Though not directly related to the SRN several policies and Local Plans sets out requirements regarding reduction of impact or improvement of Air Quality and requisite mitigation. National Highways offers continued collaboration and recommendation of a specific policy on identification of air quality and noise impacts, monitoring, management and requisite interventions.	The Council is satisfied that the policy is sufficient comprehensive and robust such that any significant adverse impacts on air quality would require mitigation whether associated with the SRN or not and on that basis a separate policy relating to the SRN is not considered necessary or appropriate.

Table 23 Core Policy 44: Noise

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP3522	Takeley Neighbourhood Plan Steering				Location of Schools	Technical details are provided illustrating the impact of locating schools in proximity to airports or significant roads. Further technical details are provided relating to the function of Stansted Airport and how it is performing in regard to these measures.	Noted. The Local Plan sets out planning policies to inform how decision on planning applications are made. It also includes some proposed strategic allocations and it is important these sites are appropriately located and where any relevant standards are satisfactorily met. The Council does not have any specific jurisdiction over the management of the airport, which is subject to separate regulatory requirements.
NDLP4045	MAG London Stansted Airport				MAG	A detailed comment relating to CP44 was provided by Stansted Airport. Pertinent points include: A newer version of the NAP (for the period 2024-2028) should be referred to. This was subject to consultation in Summer and Autumn 2023. Aircraft movements are a particular major source of noise in Uttlesford London Stansted Airport Strategy and is legally required to prepare a Noise Action Plan (NAP) under the Environmental Noise (England) Regulations 2006 (as amended).	Noted. Consideration will be given to how CP44 should be updated, however, it is suggested that noise relating to the airport should be considered in a standalone policy dealing with specific aviation factors relating to the airport and that CP44 should consider other, non-airport related, factors.

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						<p>The Strategy also sets out what controls there are on aircraft noise generated by ground operations (Section 5. 3) and what the night noise restrictions are (Section 5. 4).</p> <p>The following text should also be added after the amended paragraph 9.160: The NRs purpose is to assess/ consider and manage aircraft noise at the airport/ and includes specific measures or actions to reduce impacts on communities living around the Airport. It is a key part of delivering broader UK Government noise objectives that are to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise.</p> <p>Paragraph 9.16 I should be amended as follows to be accurate: Each year, London Stansted commissions and publishes a suite of noise contours/ which are modelled in the CM /s ANCON modelling system. The Civil Aviation Authority annually produces Noise Exposure Contours for London Stansted Airport which reflect each departure route and glide and are available on their website. Calculation of exposure to aircraft noise takes into account the level of use of each departure route and glide path, the number of aircraft movements on each path and aircraft type. Noise contours ore calculated for each year, and can be provided for future scenarios using assumptions when required Monitoring of aircraft noise will help to make sure that the policy continues to be applied to the most appropriate area. Noise sensitive developments include residential uses.</p> <p>Policy 44's section on noise-sensitive development does not currently accord with, or align correctly, the Government's Noise Policy Statement for England²⁸ and requires amendment.</p> <p>Noise sensitive uses proposed in areas that are exposed to noise between at the Lowest Observed Adverse Effect Level (LOAEL) and or the Significant Observed Adverse Effect Level (SOAEL) from existing or future industrial, commercial or transport (air, road, rail and mixed) sources will be permitted where it can be demonstrated good acoustic design has been considered early in the planning process, and that all appropriate mitigation, through careful planning, layout and design, will be undertaken to ensure that the noise impact for future users will be mode acceptable. Planning permission for new dwellings will not normally be granted within areas suited to noise levels above the Significant Observed Adverse Effect Level.</p>	
NDLP2392	National Highways				National Highways	National Highways note that some proposed strategic sites lie within proximity of the SRN and that sound buffers will not be permitted on land they own.	Noted. Although not related to CP44, whilst there are some site areas located in proximity to SRN there are no developments proposed in proximity or where there isn't more than sufficient for any relevant mitigation to occur within the development site.

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NDLP1284	Ms Debbie Bryce				Noise - Stansted Airport	A number of comments were made relating to the operation of Stansted Airport, that included, for example: <ul style="list-style-type: none"> • Reducing or eliminating night flights • Add reference to 'successor documents' the Draft Noise Action Plan 2024-2028 is currently draft. • Request for real-time data monitoring data available for all new proposed housing development. • It is suggested that CP44 makes little reference to aircraft noise. • It is suggested that WHO noise levels are being exceeded by Stansted Airport. 	CP44 relates to noise associated with development proposals that may be determined through a planning application process. It does not relate to Stansted Airport. The Airport does have a standalone policy, but for the most part, the airport is subject to separate regulatory requirements. The Secretary of State imposes limits to the number night flights and noise generated by those flights. The current night flights will run to October 2025. The 2021 Planning permission was granted on condition that the 43million passengers per year would be served within the existing annual aircraft movement limit of 274.000 movements per year. Planning conditions include a limit to the area impacted by noise from the airport and a Section 106 obligation to provide an Enhanced Sound Insulation Grant Scheme (SIGS) to minimise impact of noise on people living closest to the airport.
NDLP4180	Saffron Walden Town Council						
NDLP1766	Robert Bass						
NDLP2074	Ms Debbie Bryce						
NDLP1199	Ashdon Parish Council						
NDLP1200	Ashdon Parish Council						
NDLP133	Mr Bill Critchley						

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NDLP4083 NDLP4181 NDLP3379 NDLP3799 NDLP402	Salacia Ltd Saffron Walden Town Council Gladman Mr Neil Reeve Louise Johnson	Parish Clerk Elsenham Parish Council			Policy wording	<p>A number of comments relate to policy wording. These include:</p> <ul style="list-style-type: none"> • Any requirement for a noise assessment should be applied on a site-by-site basis. • It is suggested the phrase 'will be acceptable in noise impact terms' as being unclear and amend accordingly. • Where acceptable/ unacceptable noise levels are set out in policy they should be robustly justified by reference to evidence and/ or national policy and guidance. • It is also suggested that the policy is re-worded to emphasise that development will only not be permitted when the Unacceptable Adverse Effect Level is breached in noise sensitive rooms after taking account of Good Acoustic Design and reasonable mitigation measures. At present, the policy is worded in such a way that any development 'in areas subject to' the Unacceptable Adverse Effect Level would not be permitted, which does not reflect national guidance and would result in many areas being unable to accommodate development, even if with mitigation the development could achieve a satisfactory noise environment for future users. • all the noise measures are based on the principle of 'average noise levels' - I would like to see some 'maximum or peak' noise values included as a measure. 	
NDLP238	Mr Roy Warren	Planning Manager Sport England			Sport England - Policy Wording	<p>While the policy is considered to be acceptable, the reasoned justification should make reference to outdoor sports facilities being a potential source of noise that the policy should apply to. This is pertinent in view of the growth of artificial grass pitches and multi-use games areas in locations that adjoin sensitive uses such as residential.</p>	Noted. The supporting text will be updated as indicated.

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NDLP1492	Thames Water				Thames Water	Consideration should be given to existing operations on a proposed development which should not be approved unless suitable mitigation measures are secured. It is suggested that CP44 does not include reference to light, odour or vibration.	Noted. Consideration will be given to amending the policy to refer to existing operations. CP44 covers light, odour and vibration.