

Appendix 4: Regulation 18 Comment Summaries and Responses

Evidence Base

July 2024

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Table 1 Sustainability Appraisal

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP4000	MAG London Stansted Airport				Aircraft Noise	Paragraph 6.231 makes reference to aircraft noise, but MAG would expect this to be a thread running through the report with noise contours informing the assessment. This omission should be corrected in the Reg 19 version of the plan and SA.	Noted. This matter will be amended for the Reg 19 stage.

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
						Proposed development at Thaxted falls within noise contours for Stansted Airport.	
NDLP495	Nigel Tedder	Managing Director New Homes Project Managements Limited	Nigel Tedder		Approach to testing non-strategic housing sites	It is suggested that the SA fails to consider the potential for small and medium sized sites and should include an assessment of any potential small sites to be planned for at the larger villages. It is suggested that planning for only 6% of planned housing supply at Larger Villages is insufficient and does not meet the NPPF requirement for 10 % of sites to be provided on small sites. It is suggested that considering higher growth in larger villages would have enabled more options to be considered for reducing the scale of the strategic proposals.	The Local Plan makes clear that development at Larger Villages will be considered in more detail between the Reg 18 and Reg 19 stages of plan making and that non-strategic sites will either be included in neighbourhood plans or within the Reg 19 version of the Local Plan. This is not an oversight, but an approach that enables communities to have more say in how their local communities are planned for and to take responsibility for it through neighbourhood planning if they wish to do so. The NPPF requirement is for 10 % of sites to be provided on sites of 1 hectare or less. How the Uttlesford Local Plan meets this requirement will be clarified in the Reg 19 plan, but it is considered that a combination of completions, commitments, windfall and the proposed non-strategic allocations will meet this requirement. It is also noted that of the ten strategic sites proposed within the Local Plan, seven are under 500 homes and so still fall into either a small or medium sized site. Where non-strategic housing sites are proposed to be included in the Reg 19 plan, these will be subject to a proportionate SA process.
NDLP1094	James Balaam	G W Balaam & Son	Matthew Thomas				
NDLP1126	James Balaam	G W Balaam & Son	Matthew Thomas				
NDLP3544	Ashdon Neighbourhood Plan Steering				Ashdon NP	It is suggested that reference should be made to Ashdon Neighbourhood Plan within the SA.	Noted. This will be reviewed to inform the Reg 19 plan to see if reference to the NP would be appropriate.
NDLP3182	Phoenix Life Limited and Mulberry S				Hatfield Forest	The respondent refers to the SA recommendation that further engagement with natural England is required in relation to considering potential impacts on Hatfield Forest.	Noted.
NDLP2811	Stephen and Heather Ayles				Historic Growth in Newport	A number of comments disagree with the SA comment that historic growth in Newport has been limited, stating that since 2011 the settlement has grown by 58% with details of various applications provided.	Noted. This matter will be reviewed and corrected where appropriate in the Reg 19 Plan.
NDLP3680	Newport Parish Council	Newport Parish Council					
NDLP3681	Newport Parish Council	Newport Parish Council					
NDLP1996	Home Builders Federation				Housing Growth - Unmet Housing Needs	The need to consider any unmet housing needs from neighbouring areas is stressed. This could include from Greater Cambridge and/ or from London. It is stated that the London Mayor considers London to be a single Housing Market Area that adjoins the area that has significant influence on West Essex and East Herts.	Noted. Uttlesford hasn't been formally asked to contribute to any unmet housing. It is also noted that at the present time, Greater Cambridge is unable to confirm its own housing need, or how much housing it can plan for - and in the absence of those details, it is currently impossible for Greater Cambridge to

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							identify any unmet housing needs. However, we fully expect this may change in the context of the next plan to be progressed for adoption c. 2030.
NDLP206	Mr Richard Gilyead				Para 3.4	3.4 Integrating equalities and health The Equality Act 2010 specifies "sex" as a protected characteristic not "gender". This is important because it relates to the provision of "single-sex" spaces in public buildings such as sports, leisure, and community, facilities. The law should be quoted accurately in the plan evidence.	Noted. This matter will be reviewed and corrected where appropriate.
NDLP207	Mr Richard Gilyead				Para 5.2.11	5.2.11 Are there no constraints on the conversion of high quality agricultural land into housing development sites? Should priority be give to brownfield sites where available?	As a matter of national policy, substantial weight is granted to the use of brownfield land in planning decisions (National Planning Policy Framework Paragraph 124). However, given the rural nature of Uttlesford, there are a lack of brownfield sites which could deliver the strategic scale of growth required to meet the District's housing need.
NDLP208	Mr Richard Gilyead				Para 5.4.13	5.4.13 Rather than reporting a "general perception" of an infrastructure shortfall, the SA should detail what infrastructure has actually been delivered and what the expectations were. The shortfall in roads, health facilities, education places and open space are major influences on the policies in the new Local Plan.	The Reg 19 Plan will be informed by an updated Infrastructure Delivery Plan that will include a detailed assessment of existing Section 106 agreements. These documents will help to inform the plan and SA, but it is not necessary for the SA, in itself, to seek to duplicate, or cover off in detail, every aspect of the wider plan evidence.
NDLP209	Mr Richard Gilyead				Para 5.4.17	5.4.17 Would the proposed development sites to the north of Thaxted Road be viable without the proposed "link road"?	The link road as proposed and tested is shown to have positive impacts and it is the intention of the plan to ensure this can be delivered. If the road could not be delivered in the form currently envisaged, then alternative options for delivering a link road would be considered. It is anticipated that the evidence informing the Reg 19 plan will consider and test x2 options for how the road could be delivered, including the viability assessment informing the plan.
NDLP210	Mr Richard Gilyead				Para 5.4.20	5.4.20 There is no mention here of the major transport constraints on development in Saffron Walden. Previous highways assessments have shown most road junctions exceeding capacity even with lower growth to the south-east of the town. The "link road" will not divert traffic from most of these junctions. How will these transport constraints be mitigated?	The transport evidence informing the Reg 18 Local Plan shows that the proposed link road has positive impacts on traffic flows in Saffron Walden and overall performs satisfactorily - traffic flows in the town are shown to improve with the proposed development and link road.
NDLP922	Mike Hannant				Para 5.4.85	I note that the proposed plan punches through the centre of the Harcamlow Way, which would destroy the amenity of this well used and very attractive mature tree lined pathway. The proximity of the proposed homes and the topography of the land in relation to the motorway does not appear to have been considered. The motorway is elevated at this location and the land slopes up from the base of the motorway up the hill to the village core. Defra's noise contour map (which is omitted from the Evidence Base) clearly shows the	Noted, this will be considered in the updated draft

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						reasonable for the limits of the current built form in the village.	
NDLP922	Mike Hannant				Para 3.2.57	The landscape sensitivity assessment of low-moderate is not consistent with the findings of the appeal inspector for this site who considered that the landscape significance of the site is major/moderate.	Noted, the sites in Newport are not being considered to be allocated by Uttlesford, rather it is to be allocated under the neighbourhood plan for Newport
NDLP922	Mike Hannant				Para 6.2.31	The SA incorrectly states that the sites at Newport do not fall into the defined noise contours. This is incorrect.	Noted, this will be considered in the updated draft
NDLP922	Mike Hannant				Para 5.4.78	the Sustainability Appraisal is incorrect in its assertion that there has been "limited housing growth over the preceding c.20 years" in Newport. In fact, since 2011 to date there have been 568 additional dwellings permitted in Newport. When you factor in demolitions the increase has been 533 over the 974 dwellings recorded in the 2011 census which represents a 55% increase to the settlement with minimal improvements to infrastructure to show for it – two bus shelters and one pavement between 2011 and 2021	Noted, this will be considered in the updated draft
NDLP3795	Belinda Challenger				RA's - General Comments	A few comments reference the SA being described as an 'interim' report, rather than the formally required 'SA Report' without explanation.	Noted. The formal SA Report is required to form part of the submission documents published for consultation at Reg 19 stage, which is the stage a full SA Report is required. It is considered good practice to produce an Interim SA Report at Regulation 18 stage in order to frontload consultation and engagement on an early draft of the plan, and the reasonable alternatives. Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations states "The report shall identify, describe and evaluate the likely significant effects on the environment of— (a) implementing the plan or programme; and (b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme". On that basis, it is for the Council to develop what it considered to be 'reasonable' alternatives in the context of the plan objectives – there is no expectation that all conceivable options, or combinations of options, are considered, that would not be 'reasonable'. It is also important to consider the NPPF requirement for plan evidence to be 'proportionate'. Specific points of detail will be reviewed and updated to inform the Reg 19 SA and Plan where appropriate.
NDLP3859	Lands Improvement Holdings					A number of comments also state that the SA has not considered all reasonable alternatives. It is suggested that a full SA Report should be prepared for a further Reg 18 consultation.	
NDLP3886	Lands Improvement Holdings					Various comments are made about the merits or demerits of some of the options considered and whether other options should also have been considered. Examples include: • Considering a Garden Community option north of Stansted Mountfitchett, but not testing higher growth options at Stansted Mountfitchett itself. • Under the economy and employment heading, there has been no identification of the benefits of the Chelmer View scheme given its close proximity to the Station Road, Chelmsford Road, and Flitch and Oak Industrial Areas.	
NDLP3902	Pelham Structures Limited					It is suggested that the SA fails to fully assess all potential constraints and, in some cases, misinterprets its own evidence – it is suggested that this leads to mis-weightings. For example: • Skewed landscape assessments • Failing to consider heritage constraints (for example for the Church End site) • Failing to consider flood risk • Failing to consider infrastructure requirements to ensure deliverability/ viability, and • Failure to consider transport impacts of development	
NDLP3607	Knight Frank						
NDLP402							

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
	Louise Johnson	Parish Clerk Elsenham Parish Council				(for example for the Church End site). It is suggested that there are a number of alternative scenarios, or combinations of scenarios, that could have been considered.	
NDLP3930	Pelham Structures Limited	Pelham Structures Ltd			RA's - Larger Villages	The SA is criticized for not assessing individual sites at Larger Villages and on that basis, it is suggested that the 1,000 housing requirement cannot be considered to be too high or too few.	The Plan is clear that non-strategic sites will be either added to the Reg 19 plan, or picked up through Neighbourhood Plans. Any sites added to the Reg 19 plan will be subject to SA to inform the Reg 19 plan, whereas as sites allocated through Neighbourhood Plans, will be subject to separate SA processes. However, the Reg 18 plan and the village housing requirement figures were based on the HELAA and so it is known that there is more than sufficient capacity available.
NDLP3390	Strategic Land V Limited & Ms Hawke						
NDLP3400	Strategic Land V Limited & Ms Hawke						
NDLP3902	Pelham Structures Limited				RA's - New Settlements	A number of comments provide technical detail demonstrating why various Garden Community proposals could overcome identified constraints, deliver sustainable development and should have been considered in more detail in the SA. In particular, the scoping out of Garden Communities as an 'unreasonable' alternative, is questioned.	It is anticipated that the Reg 19 plan will need to make provision for c. 5,000 additional homes across strategic and non-strategic sites and that these need to consist of sites of different size, type and geography. It will have been 20 years since Uttlesford adopted a new Plan and there is an imperative to progress a plan quickly. Overall, it is considered that the longer-term potential for a Garden Community would be best considered in more detail in the next plan that will need to be adopted c. 2030. This allows time to consider the implications, especially for infrastructure provision, to be considered in sufficient detail for sites of 5,000 homes (or more) and to relate more effectively to planning for Greater Cambridge that at the present moment in time is unable to confirm what their own housing need is, how much of that need can be met in Cambridge, and what if any unmet need, will arise. It is not considered appropriate to consider small scale development within what could become part of a large scheme in the longer term, before all of the infrastructure (and other requirements) have been adequately considered. The current Local Plan must be submitted before June 2025 and Adopted by December 2026 in order to be progressed under the current planning System. Not meeting these deadlines would delay the plan by at least two (more likely
NDLP2256	Landsec						
NDLP2547	Geoff Bagnall						
NDLP3210	Ceres Property						
NDLP3749	Denise Gemmill						
NDLP3875	Grosvenor Property UK						
NDLP2257	Landsec						

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							three years). Thus, considering longer term strategic planning now would prevent Uttlesford from benefiting from an updated plan quickly, whilst bringing forward a plan quickly now, does not undermine the opportunity to consider Garden Communities for inclusion in the plan to be adopted in 2020. For these reasons, planning for a Garden Community at the present time in the currently emerging plan are considered to be 'unreasonable'.
NDLP3228	Weston Homes Plc				SA	The SA is not consistent in its assessment of the growth scenarios and the plan should consider the positive appraisals of high growth scenarios to influence the spatial strategy within the local plan. Further assessment is required of windfall sites.	Noted. This is considered in more detail in the Table of comments relating to the SA. Overall, the Council is satisfied the SA considers options for growth appropriately.
NDLP3274	Weston Homes Plc						
NDLP3354	Gladman				SA - General Comments	2.2 Sustainability Appraisal 2.2.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA) Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives. 2.2.2 The Council should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Local Plan's decision-making and scoring should be robust, justified and transparent.	Noted.
NDLP909	Catesby Estates Ltd (Stacey Rawlings)	Director Roebuck Land and Planning Ltd	Stacey Rawlings		SA Approach to Great Chesterford	The respondent states that a case for development at Great Chesterford is made due to its sustainability credentials and links to employment. It is stated that the lack of testing of any increase in housing through the stated growth scenarios is fatally flawed. It is also stated that the conclusion of nil strategic growth for Great Chesterford as a constant across all the tested growth scenarios based on 'perceived' landscape constraints is not justified. Furthermore, that additional detail supporting a planning application for the respondents client to the north of Great Chesterford was available to inform the SA and plan process. It is suggested there is no transparency in the site selection process and it is stated that there is a lack of any full and proper	The Council acknowledges the sustainability credentials of Great Chesterford within the Plan. However, some of the potential development sites at this settlement are either not available; land to the south east was previously promoted but is no longer available and land south of the railway station relies on access from neighbouring Cambridge, who are currently unable to progress their Local Plan – thus neither of these sites can be deemed deliverable at the current time. The site identified by the respondent was at an advanced stage of consideration through a planning application process and it was considered inappropriate to consider this site through the Local Plan process
NDLP966	Catesby Estates Ltd (Stacey Rawlings)	Director Roebuck Land and Planning Ltd Director Roebuck	Stacey Rawlings				

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NDLP913 NDLP973	Catesby Estates Ltd (Stacey Rawlings) Catesby Estates Ltd (Stacey Rawlings)	Land and Planning Ltd Director Roebuck Land and Planning Ltd	Stacey Rawlings stacey Rawlings			assessment of strategic development options at the tier 2 settlements.	whilst it was being considered through the Development management process. If approved, the application would form an additional commitment and thus inform the Reg 19 plan. The potential for a much larger Garden Community to the north of Great Chesterford is discussed elsewhere, but if the plan needs to make provision for c. 5,000 homes across the whole district in total, then planning for a standalone community of this scale is not currently required. However, consideration for longer term and more strategic growth could be considered through the next plan that will need to be brought forward quickly (adoption expected c. 2030/31). This timing is more likely to enable greater consideration for planning for Cambridge and allows time for the more significant highway/ infrastructure requirements to be considered.
NDLP3931	Pelham Structures Limited	Pelham Structures Ltd			SA approach to Great Dunmow	The response makes reference to HELAA sites 003 and 019 that could deliver 400 homes on sustainable locations within easy walking distance of the town centre along with criticism of the assessment of site 009 for not giving adequate consideration of the landscape and heritage sensitivity. There is also reference to a previous appeal decision and 2005 LP policies that seek to have strict controls over development in the countryside, along with impact of recent appeal decisions, for example, to approve 1,200 homes west of Great Dunmow.	Noted. The HELAA will be updated to inform the Reg 19 plan and reflect any consultation responses and this update will in turn inform the SA update. The new plan will replace any previous policies and will provide a comprehensive and coherent strategy and suite of policies – for example, any strategic allocations will provide a baseline, with settlement boundaries updated appropriately – these sites would no longer constitute countryside. The Reg 18 plan and supporting documents makes clear that completions and commitments up to April 2024 will be used to inform the Reg 19 plan – it is anticipated that c. 5,000 additional homes will need to be planned for rather than 6,000 as per the Reg 18 plan.
NDLP2927	Paul Cronk				SA approach to growth at Elsenham	The Plan and SA conclusions not to consider further growth at Elsenham is questioned with details provided for why development sites at Elsenham are suitable.	Noted. The HELAA will be updated to inform the Reg 19 plan and reflect any consultation responses and this update will in turn inform the SA update.
NDLP3682 NDLP3684 NDLP3686	Newport Parish Council Newport Parish Council Newport Parish Council				SA approach to growth at Newport	Parish Council comments questioning the assumptions and approach of the SA at Newport	Noted. The SA, site selection process and wider evidence base will be updated at Regulation 19 stage which will address any concerns raised.

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NDLP3687	Newport Parish Council						
NDLP3688	Newport Parish Council						
NDLP3689	Newport Parish Council						
NDLP3692	Newport Parish Council						
NDLP3694	Newport Parish Council						
NDLP3695	Newport Parish Council						
NDLP3690	Newport Parish Council	Newport Parish Council			SA approach to growth at Newport - water infrastructure	Reference is made to a response from the EA submitted to the emerging Newport, Quendon and Rickling Neighbourhood Plan that identifies inadequate sewerage capacities in the area. A quote from the EA is included in the submission: 'We have identified that the Plan area boundary includes the Sewage Treatment Works Newport STW, which is currently operating close to or exceeding its permitted capacity. There is potential for there to be a barrier to growth across the Plan Period and delivery of any potential site allocations including windfall sites. Consideration for phasing of development in line infrastructure improvements may be required'.	The Council consult with a range of infrastructure providers, including water companies and the EA. The Council is not aware of any show stoppers, but fully appreciate that new and/ or improved infrastructure and capacity upgrades will be required to support development. This is in actual fact what the EA have said 'consideration for phasing of development in line infrastructure improvements may be required'.
NDLP3691	Newport Parish Council	Newport Parish Council					

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NDLP705	Mr Neil Hargreaves				SA approach to growth at Newport - incorrect information	It is suggested that the SA comments about Newport are 'totally incorrect'. The SA is described as a key document that purports to establish where sustainable locations are within the district – the respondent is disappointed that inaccurate work has been completed.	The Council is content the work undertaken is robust and fit-for-purpose. However, plan making is an iterative process and if any errors are identified, they will be corrected to inform the Reg 19 stage. The Council is content that Newport is a highly sustainable and suitable location for development, being the only Local Rural Centre in the district to benefit from a secondary school, benefiting from a good range of services and facilities, including a range of retail choices and all within easy cycling and walking distance, a railway station and comparatively good bus connectivity.
NDLP707	Mr Neil Hargreaves				SA approach to growth at Newport - water infrastructure	Reference is made to a response from the EA submitted to the emerging Newport, Quendon and Rickling Neighbourhood Plan that identifies inadequate sewerage capacities in the area. A quote from the EA is included in the submission: 'We have identified that the Plan area boundary includes the Sewage Treatment Works Newport STW, which is currently operating close to or exceeding its permitted capacity. There is potential for there to be a barrier to growth across the Plan Period and delivery of any potential site allocations including windfall sites. Consideration for phasing of development in line infrastructure improvements may be required'.	The Council consult with a range of infrastructure providers, including water companies and the EA. The Council is not aware of any show stoppers, but fully appreciate that new and/ or improved infrastructure and capacity upgrades will be required to support development. This is in actual fact what the EA have said 'consideration for phasing of development in line infrastructure improvements may be required'.
NDLP3178 NDLP1509	Phoenix Life Limited and Mulberry S Natural England				SA approach to growth at Takeley	The five growth scenarios are based upon the site at Takeley coming forward for employment purposes. No alternative sites have been considered as part of the SA. Impacts on biodiversity are not adequately considered.	Section 5.4 of the Interim SA Report explains the outline reasons for only progressing one growth scenario at Takeley to Section 5.5, and why it is 'unreasonable' for other alternatives to be taken forwards. The environmental effects of all reasonable alternatives against biodiversity and Hatfield Forest are considered in section 6.2.
NDLP4006	Pelham Structures Limited	Pelham Structures Ltd			SA Approach to Ugley Garden Community	Various comments disagreeing with the SA scoring of Scenario 5 (which contains the site) and where the Scenario outperforms others. Criticism that the smaller-scale Village Hall site is not considered in isolation in the SA.	The Ugley Garden Community site north of Stansted Mountfitchet is part of Scenario 5. The assessment of the reasonable alternative growth scenarios is set out in Section 6 of the Interim SA, with the Council's reasons for the preferred approach (Scenario 3) set out in Section 7, noting that all scenarios have their benefits and disbenefits, but on balance Scenario 3 is judged to represent sustainable development. This will be reviewed and, if necessary, updated in the SA Report accompanying the Regulation 19 plan. With regard to the smaller non-strategic site at Ugley being considered in the SA, Ugley falls within "Open Countryside" within the

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							Settlement Hierarchy and is therefore outside of the Larger Villages where development is being considered.
NDLP880	Mr Rupert Kirby				SA assessment of sites at Great Dunmow	It is suggested that the assessment of Great Dunmow is flawed as sites 019 is overlooked and that site 003 is also dismissed. The merits of these sites are outlined including that site 019 is well located for accessing the town centre.	Noted. Site 019 has planning permission and is therefore ruled out of the site selection process. Site 003 also has planning permission, and any remaining/ undeveloped land, is being deliberately being left undeveloped as part of the overall proposal for the site and is therefore deemed to be unavailable. This site was also ruled out of further consideration. These details are set out in the Council's Site Selection Topic Paper.
NDLP1674	English Rural Housing Association				Supporting Evidence	Additional evidence and research provided to support the plan and SA	Noted.
NDLP1675	English Rural Housing Association						

Table 2: Local Housing Needs Assessement

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP3232	Weston Homes Plc				Evidence	A number of comments relate to the evidence supporting the Plan, particularly in this context, the LHNA. These include:	Noted. The Council is satisfied the LHNA has been prepared correctly, although it will be updated to inform the Reg 19 LP as informed by any changes in national policy, or Reg 18 consultation responses where appropriate. Overall, the Plan seeks to meet the identified housing need, using the Govt's preferred 'Standard Methodology' in full and to provide for c. 10 % headroom, to provide for additional flexibility. In terms of relying on existing completions and commitments – it is the case the proportion of these contributing to the identified need is relatively high, but this is a product of there being no up to date plan in place for some years and the degree speculative development has been able to come forward.
NDLP3358	Gladman					<ul style="list-style-type: none"> • The LHNA refers to the 2021 NPPF instead of the most recent version (2023). • There are formatting issues with the document. The plan period should be amended to 2021-2041. 	
NDLP3854	Grosvenor Property UK					<ul style="list-style-type: none"> • There is support for the identification of the requirement for 13,680 dwellings over the plan period. • There are issues around the provision of affordable housing and the implementation of the 'cap' within the methodology and that the plan does not adequately address issues around affordable housing and the worsening housing market. 	
NDLP3862	Lands Improvement Holdings					<ul style="list-style-type: none"> • The LHNA does not appropriately consider the impact of employment growth, particularly around Cambridge. The LHNA does not appropriately account for the levels of growth Uttlesford is likely to see, given its proximity to London and the Cambridge arc. 	
NDLP4057	Salacia Ltd						

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NDLP4156	G W Balaam & Son	Newport Parish Council				<ul style="list-style-type: none"> The plan should not rely so heavily on development that has already come forward to meet the housing requirement for the plan period. It is suggested that officers undertaking work on the Local Plan did not visit either Newport or Takeley. 	
NDLP3696	Newport Parish Council						
NDLP3502	Kier						
NDLP277	Alastair Farr				Housing Figures General	It is suggested that the plan for housing is excessive, doesn't take account of the recent approval for 1,200 homes west of Dunmow and should be revised downwards.	Noted. The plan and supporting evidence is clear that the Reg 19 plan will be informed by the April 2024 commitment figures are on that basis, it is anticipated that the 'additional' level of housing to plan for can be reduced.

Table 3: Housing and Economic Availability Assessment

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP3598	Knight Frank				Additional site referenced but not formally submitted.	Reference to a potential development site at Stansted Mountfitchet. No further details submitted to support the proposed site.	We note the reference to a potential site for residential development which has not previously been considered through the HELAA, but in the absence of any supporting information including a location map we are unable to consider the site in the HELAA update to support the Regulation 19 Local Plan. We recommend that it is submitted to a future Call for Sites for potential inclusion in a future iteration of the Local Plan.
NDLP3606	Knight Frank						
NDLP498	Nigel Tedder	Managing Director New Homes Project Managements Limited	Nigel Tedder		Check HELAA Site promoter - Felsted 020 RES	HELAA capacity for Felsted 020 RES does not reflect extant permission for 2 dwellings	The HELAA is intended to illustrate the potential future capacity of available land in the District. Sites with permission are captured within the data on completions and commitments which will be revisited for the Regulation 19 Local Plan. Their capacity has been set at zero in the HELAA to avoid double counting of capacity.
NDLP498	Nigel Tedder	Managing Director New Homes Project	Nigel Tedder		Check HELAA site promoter Thaxted 027 RES.	HELAA capacity for Thaxted 027 RES does not reflect extant permission for 9 dwellings	The HELAA is intended to illustrate the potential future capacity of available land in the District. Sites with permission are captured within the data on completions and commitments which will be revisited for the Regulation 19 Local Plan. Their capacity has

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		Managements Limited					been set at zero in the HELAA to avoid double counting of capacity.
NDLP3697	Newport Parish Council	Newport Parish Council			Comment on Newport 001 RES (non-landowner)	Third party comment on Newport 001 RES noting proximity to heritage assets and flooding/drainage issues near site entrance.	Noted. The HELAA assessments will be revisited as part of the update to support the Regulation 19 Local Plan, and suitability conclusions will be revisited where appropriate to reflect the identified constraints.
NDLP667	Robert Fairhead		Vaughan Bryan		Comment on other HELAA sites in Great Chesterford	Concerns over flood risk, landscape and heritage impact of development on GtChesterford 002 RES and GtChesterford 010 RES, and sustainability of GtChesterford 008 RES	The concerns over the potential impact of development of the three sites are noted. The Regulation 19 HELAA update will provide more commentary on site suitability, and the information submitted will be reviewed as part of this process.
NDLP2818	Stephen and Heather Ayles				Comment supporting development (non-promoter) - Newport 013 RES	HELAA conclusions in relation to biodiversity and access for site Newport 013 RES are inaccurate and should be revisited.	Noted. The information provided will be considered as part of the HELAA update to support the regulation 19 Local Plan, and consequential updates made to the conclusions where necessary.
NDLP590	G Martyn Porter				Comment supporting non-allocation of a HELAA site	Support for the non-allocation of three HELAA sites in Littlebury on the grounds that they would not constitute sustainable development.	Noted. All sites will be reassessed against the emerging spatial strategy as part of the Regulation 19 HELAA update. This is unlikely to change significantly from the Regulation 18 Local Plan (Core Policy 3) and it is not envisaged that as a Smaller Village Littlebury will be expected to accommodate growth beyond limited infill to meet local needs for housing and employment.
NDLP2095	Jane Dukes						
NDLP1772	Janice Heales						
NDLP2103	Lindsey and Tim Coyne						
NDLP1916	Louise Johnson						
NDLP2109	Amanda Barclay & Iain Black						
NDLP1923	Sally Kennedy						
NDLP1926	Carmel Carline						
NDLP2131	Malcolm Domb						
NDLP2157							

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP2049	Lucinda Whife						
NDLP2162	Mr Robert Osborne						
NDLP2109	Thomas and Isabelle Page						
NDLP2131	Amanda Barclay & Iain Black						
NDLP2157	Malcolm Domb						
NDLP2162	Lucinda Whife						
NDLP2192	Thomas and Isabelle Page						
NDLP2199	Robin Grayson						
NDLP2208	Mrs Isobel Grayson						
NDLP2404	Claudia Haisman-Green and Mike Green						
NDLP2410	Michael Hancock						
NDLP2472	Jennifer Parkinson						
	Rosemary Wild						

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NDLP2479	Andrew Figge						
NDLP2507	Michael Cox						
NDLP2521	Tom Hallmark						
NDLP2525	Linda Kelsey						
NDLP2670	Mr and Mrs John and Gillian Broomfield						
NDLP2763	Mrs Isobel Grayson						
NDLP2800	Nick Dukes						
NDLP2833	Mr and Mrs Roberts						
NDLP2942	Mr and Mrs John and Gillian Broomfield						
NDLP3034	Mr Brian Johnson						
NDLP4126	Tim and Alexandra Bradshaw						
NDLP1504	Katie Ransom						
NDLP3301	24/7 Investments Limited				Comment that commitments and completions should be allocated in the	The Local Plan allocations should include committed and completed employment sites which contribute to land supply.	We will consider whether to include non-strategic allocations and allocations of sites with extant permission in the Regulation 19 version of the Local Plan.

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
					Local Plan (employment)		
NDLP3179	Phoenix Life Limited and Mulberry S				Comment that sites submitted since the 2021 Call for Sites have not been included in the HELAA	The non-inclusion of sites submitted following the 2021 Call for Sites means that potentially suitable alternative sites have not been considered for allocation.	The Regulation 19 HELAA update will include sites submitted following the closure of the 2021 Call for Sites, including any sites submitted to the Regulation 18 consultation. Any supporting information provided will be considered as part of this process.
NDLP3771	Harlow Agricultural Merchants Ltd				Dispute site assessment (Local Wildlife Site designation)	The amber rating for Local Wildlife Site designation assigned to Newport 013 RES is inaccurate since the site is a potential rather than designated Local Wildlife Site.	Noted. The HELAA update will revisit conclusions on Local Wildlife Sites and, where sites fall within potential LWS rather than designated sites this will be identified as a potential ecological constraint but will not lead to an amber rating.
NDLP3494	Allison Evans				Error in HELAA interactive map	Takeley 005 EMP does not appear in interactive map of HELAA sites.	A new interactive map of HELAA sites will be produced to support the Regulation 19 consultation, including sites from all sources. Takeley 005 EMP was assessed through the HELAA and the conclusions are presented in the proformas which were published for the Regulation 18 consultation.
NDLP1057	Jackie Deane	Parish Clerk Takeley			HELAA assessments have been designed to fit spatial strategy	Suggestion that the HELAA capacity has been amended to suit the emerging spatial strategy and village housing requirements.	The HELAA is the starting point for consideration of the housing requirements for the Larger Villages, and the Local Plan requirements are based on the HELAA capacity rather than the other way round. The assumptions which have led to the indicative capacity are set out in the HELAA methodology. These will be revised as part of the Regulation 19 HELAA update to take into account the presence of constraints to development, and the village housing requirements will be adjusted accordingly.
NDLP3929	Pelham Structures Limited	Pelham Structures Limited			HELAA category B sites is too broad a category and needs further refinement	There is significant variation in site suitability within category B of the HELAA, and the number of categories should be expanded to reflect this.	It is recognised that the majority of sites are grouped into suitability Category B. This reflects the relatively low incidence of high-level constraints to development across the district. However, additional commentary on site suitability will be included in the Regulation 19 HELAA update which will allow for a more nuanced comparison of sites, and further refinement will be undertaken to take into account the emerging spatial strategy.
NDLP2233	Jean Johnson				HELAA does not adequately reflect development management decisions	The HELAA conclusions for site Takeley 005 EMP do not reflect a recent decision on a proposed logistics centre.	The planning history for the site will be revisited as part of the HELAA update and, where appropriate, the Inspector's conclusions will be reflected in the suitability conclusions.
NDLP498	Nigel Tedder	Managing Director New Homes Project Managements Limited	Nigel Tedder		HELAA methodology - density inappropriate	The average density of 35dph applied to sites outside the key settlements and strategic sites is not appropriate for all edge of settlement sites in larger villages.	As set out in the HELAA methodology, the development potential of each site is calculated using a standardised density assumption. This is in line with the emerging Design Code that recommends a density of 30-40dph for sites in non-strategic settlements, including the larger villages. Whilst it is recognised that individual proposals are likely to vary

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							from the standardised capacity, it is important to provide a consistent means of assessment for all sites to inform the site selection process. We do not propose to change this approach for the Regulation 19 HELAA.
NDLP3697	Newport Parish Council	Newport Parish Council			HELAA methodology does not account for Defra's noise contours for the strategic road and rail network	The HELAA methodology does not include consideration of Defra's noise contours for the strategic road and rail network. Sites in Newport are predominantly in close proximity to either the railway or the M11.	Noted. Whilst the HELAA methodology does not include a specific category for the road and rail noise contours, the proximity of sites to the railway and motorway will be reflected in the suitability conclusions in the Regulation 19 HELAA. This is not considered to be an absolute constraint to development since it is possible to address noise impact through landscaping, layout and building design.
NDLP2906	Debden Parish Council				Larger Village Housing Requirement	The HELAA capacity and the housing requirement at Larger Villages is does not take account of issues raised within past development management decisions.	The planning history for sites will be revisited as part of the HELAA update and, where appropriate, the conclusions will be reflected in the larger villages housing requirements.
NDLP974	Mary Power	Director Richstone Procurement Limited	Mary Power		HELAA should consider sites submitted to Stebbing Neighbourhood Plan	Proposes a new site in Stebbing which was not submitted to the Call for Sites and seeks a strategic allocation to accommodate the entire housing requirement for Stebbing. Submission refers to a site location plan which is missing from the documentation provided/	The HELAA will be updated to support the Regulation 19 Local Plan, and this will include consideration of new sites proposed through the Regulation 18 consultation. However, it is not possible from the submitted information to determine the extent of the proposed new site as no site location plan has been provided. Where necessary, the Council will consider making allocations in the Larger Villages if the housing requirement is not being met through a neighbourhood plan.
NDLP2273	Mulberry House Farms LLP				HELAA site promotion (new site)	Promotion of a new site in Arkesden for residential development	The site was assessed for employment use in the Regulation 18 HELAA. Its resubmission for residential use is noted, and the site will be assessed through the HELAA update to support the Regulation 19 Local Plan.
NDLP2276	Mulberry House Farms LLP				HELAA site promotion Arkesden 002 EMP promoted for residential (part permissioned)	Promotion of a new site in Arkesden for residential development	The site was assessed for employment use in the Regulation 18 HELAA. Its resubmission for residential use is noted, and the site will be assessed through the HELAA update to support the Regulation 19 Local Plan.
NDLP796 NDLP668	Sheena Dale Ian, Sheena, and Tracy Dale, Dale, and Hunter				HELAA site promotion Ashdon 001 RES. HELAA site promoter aware of adjacent rural exception site proposals by Uttlesford District Council	Promotion of HELAA site Ashdon 001 RES emphasising that the site could make a positive contribution to supporting the local school and services and highlighting proximity to adjacent rural exception site.	The new information provided will be considered as part of the process of updating the HELAA for the Regulation 19 consultation and revisiting the site selection process.

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NDLP3480	Richstone Procurement Ltd				HELAA assessment Clavering 005 RES - support	Support for HELAA conclusions for site Clavering 005 RES	Noted, the council will consider making Non-Strategic Allocations in Larger villages if the housing requirement is not being met through a neighbourhood plan as per the Local Plan Spatial Strategy.
NDLP3997	Pelham Structures Limited	Pelham Structures Limited			HELAA Site promotion Clavering 006 RES.	Promotion of a site with planning permission for one home in Clavering which is proposed as a non-strategic site allocation.	The promotion of the site is noted. Where necessary, the Council will consider making non-strategic allocations in the Larger Villages if the housing requirement is not being met through a neighbourhood plan.
NDLP4005	Pelham Structures Limited	Pelham Structures Limited			HELAA Site Promotion Clavering 007 RES	Promotion of a site in Clavering which is proposed as a non-strategic site allocation.	The additional supporting evidence is noted and will be considered through the HELAA update to support the Regulation 19 Local Plan. Where necessary, the Council will consider making non-strategic allocations in the Larger Villages if the housing requirement is not being met through a neighbourhood plan.
NDLP3998	Pelham Structures Limited	Pelham Structures Limited			HELAA Site Promotion Clavering 008 RES	Promotion of a site in Clavering which is proposed as a non-strategic site allocation.	The additional supporting evidence is noted and will be considered through the HELAA update to support the Regulation 19 Local Plan. Where necessary, the Council will consider making non-strategic allocations in the Larger Villages if the housing requirement is not being met through a neighbourhood plan.
NDLP4155	G W Balaam & Son				HELAA site promotion Clavering 011 RES, Clavering 012 RES and Clavering 013 RES (revised boundary) New HELAA site Clavering (west of Eldridge Close)	Promotion of three existing HELAA sites in Clavering, including one with a revised boundary. Submission of a new site for consideration.	The additional information provided on the previously assessed sites is noted and will be reflected in the updated HELAA to support the Regulation 19 Local Plan. This includes amendments to the boundary of Clavering 013 RES. The new site will be included in the HELAA update, taking into account the supporting information provided.
NDLP1110	James Balaam						
NDLP1115	James Balaam						
NDLP1119	James Balaam						
NDLP4159	G W Balaam & Son						
NDLP3474	Richstone Procurement Ltd				HELAA site promotion Clavering 014 RES	The Local Plan allocations should include committed residential sites and non-strategic sites, including Clavering 014 RES	We will consider whether to include non-strategic allocations and allocations of sites with extant permission in the Regulation 19 version of the Local Plan.
NDLP4010	Pelham Structures Limited	Pelham Structures Ltd			HELAA site promotion Debden 003 RES	Promotion of a previously assessed HELAA site in Debden. Proposal to allocate as a non-strategic site in the Local Plan rather than in a neighbourhood plan.	The additional supporting evidence is noted and will be considered through the HELAA update to support the Regulation 19 Local Plan. Where necessary, the Council will consider making non-strategic allocations in the Larger Villages if the housing requirement is not being met through a neighbourhood plan.

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NDLP3146	Smith Bros				HELAA site promotion Felstead 001 RES; Felsted 002 RES and Felsted 003 RES and Felsted 004 MIX	Promotion of four HELAA sites in Felsted with supporting information to demonstrate how identified constraints in relation to settlement character, landscape sensitivity, heritage, flooding, amenity and biodiversity impact can be addressed. Seeks allocation of the sites through the Local Plan if the Parish Council is not progressing a neighbourhood plan with site allocations.	The additional supporting evidence is noted and will be considered through the HELAA update to support the Regulation 19 Local Plan. Where necessary, the Council will consider making non-strategic allocations in the Larger Villages if the housing requirement is not being met through a neighbourhood plan.
NDLP623	David Brien				HELAA site promotion Felsted 005 RES	Submission of further information to associate the HELAA assessment of Felsted 005 RES	The promotion of the site is noted and the additional information provided will be reviewed as part of the Regulation 19 HELAA update.
NDLP3829	Hillrise Homes Limited				HELAA site promotion Felsted 007 MIX	Submission of further information to address the amber categories in the 2023 HELAA	The promotion of the site is noted and the additional information provided will be reviewed as part of the Regulation 19 HELAA update.
NDLP3638	C J Trembath				HELAA site promotion for GtEaston 002 RES	Promotion of a site in Great Easton at Brocks Mead	The promotion of this site is noted
NDLP2241	Ian Butcher				HELAA site promotion for GtDunmow 011 EMP	Support for HELAA conclusions for site GtDunmow 011 EMP.	The support for the findings of the HELAA in relation to this site is noted.
NDLP973	Catesby Estates Ltd (Stacey Rawlings)	Director Roebuck Land and Planning Ltd	Stacey Rawlings		HELAA site promotion Great Chesterford 002 RES	The capacity identified in the HELAA for GtChesterford 002 RES does not account for the presence of a scheduled monument. Outline planning application demonstrates how amber constraints identified in HELAA in relation to highways, flood risk, TPOs, Public Rights of Way and archaeological sites can be addressed.	The Regulation 19 HELAA will include an updated capacity which reflects the presence of significant constraints in accordance with NPPF Footnote 7. The updated information submitted in the representation and the outline planning application will be reviewed as part of the HELAA update.
NDLP1127	Guy Kaddish	Agent Grosvenor Property UK	Claire Galilee		HELAA site promotion Gt Chesterford 006 MIX and 007 MIX	Submission of supporting information for sites GtChesterford 006 MIX and GtChesterford 007 MIX which addresses constraints identified as amber in the Regulation 18 HELAA	The new information provided will be considered as part of the process of updating the HELAA for the Regulation 19 consultation and revisiting the site selection process.
NDLP3995	Pelham Structures Limited	Pelham Structures Limited			HELAA site promotion Gt Dunmow 042RES, Gt Dunmow 003 RES and Gt Dunmow 019 MIX	Promotion of HELAA sites GtDunmow 042 RES, GtDunmow 003 RES and GtDunmow 019 MIX.	The promotion of the three sites is noted.
NDLP2062	Clare College Cambridge				HELAA site promotion GtChesterford 009 RES	Promotion of land which forms part of a larger site assessed in the HELAA.	The promotion of the previously assessed site is noted.
NDLP3301	24/7 Investments Limited				HELAA site promotion GtDunmow 011 EMP	Support for HELAA conclusions for site GtDunmow 011 EMP.	The support for the findings of the HELAA in relation to this site is noted.

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NDLP1145	Rob Snowling	Director Pigeon Investment Management Ltd	Sophie Pain		HELAA site promotion GtDunmow 017 RES	Provision of detailed supporting information for GtDunmow 017 RES promoting the site for specialist housing allocation in the Local Plan	The new information provided will be considered as part of the process of updating the HELAA for the Regulation 19 consultation and revisiting the site selection process.
NDLP3349	The Mackenzie Trust				HELAA site promotion GtDunmow 040 RES	Promotion of part of HELAA site GtDunmow 040 RES which has extant hybrid permission. Comment indicates that a developer is being brought on board to implement the permission.	The promotion of the HELAA site is noted, and the additional commitment to implementing the planning permission for this site is welcomed.
NDLP3638	C J Trembath				HELAA site promotion GtEaston 002 RES and LtCanfield 002 EMP	Promotion of two sites at Great Easton and Little Canfield that were assessed in the HELAA for residential and employment use.	The promotion of the two sites is noted.
NDLP3630	C J Trembath						
NDLP3994	Pelham Structures Limited	Pelham Structures Limited			HELAA site promotion Hatfield H 005 RES and Hatfield H 006 RES.	Promotion of HELAA sites HatfieldH 005 RES and HatfieldH 006 RES.	The promotion of the two sites is noted.
NDLP3162	BNP Paribas				HELAA site promotion HatfieldBO 005 MIX	Submission of new information for site HatfieldBO 005 MIX demonstrating how identified access/highways constraints can be addressed and noting the contribution to housing and employment, biodiversity and sustainability.	The additional supporting evidence is noted and will be considered through the HELAA update to support the Regulation 19 Local Plan.
NDLP2929	Paul Cronk				HELAA Site promotion Henham 006 RES (part permissioned) promoted for allocation of remainder	The submitted site boundary for Henham 006 RES is larger than the boundary of the site which has been granted permission for development of 200 homes. Seeks the allocation of the remainder of the site to deliver additional dwellings.	The planning history of the site has been noted and the Council will consider whether it is appropriate to allocate the remainder of the site for additional development in the Regulation 19 Local Plan.
NDLP3996	Pelham Structures Limited	Pelham Structures Limited			HELAA Site Promotion Langley 002 EMP	The site will deliver additional local employment and should be considered for allocation in the Local Plan.	The promotion of the site is noted. The Local Plan's strategy for addressing the District's employment needs will be revisited through an update to the employment site selection topic paper to support the Regulation 19 plan.
NDLP3732	Enterprise Residential Development				HELAA site promotion LtChesterford 002 RES	Supportive of HELAA findings for LtChesterford 002 RES and seeking allocation of the plan for residential use in the Local Plan.	The support for the HELAA findings is noted.
NDLP2316	Paul Cronk				HELAA site promotion LtEaston 006 RES	Promotion of HELAA site LtEaston 006 RES	The resubmission of the site for consideration is noted. Any new information provided will be considered as part of the process of updating the HELAA for the Regulation 19 consultation and revisiting the site selection process.
NDLP2317	Paul Cronk				HELAA site promotion LtEaston 006 RES	Planning history information in HELAA is inaccurate and relates to an adjacent site	The planning history for the site will be revisited as part of the HELAA update and updated as required.

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					Updated planning history - decision post 1st April 2023		
NDLP3991	Hawridge Strategic Land				HELAA site promotion LtHallingbury 003 Res	Promotion of HELAA site and provision of supporting information to demonstrate how constraints identified in the HELAA can be addressed	The promotion of the previously assessed site is noted and the additional information provided will be reviewed as part of the Regulation 19 HELAA update.
NDLP3771	Harlow Agricultural Merchants Ltd				HELAA site promotion Newport 013 RES	Promotion of HELAA site Newport 013 RES and support for general findings on suitability, availability and achievability.	The promotion of the site and support for the suitability, availability and achievability conclusions is noted.
NDLP1078	Luxus Homes Stoney Common Limited		Peter Biggs		HELAA site promotion Stansted 003 RES updated boundary	Stansted 003 RES is resubmitted with a revised site boundary that increases the site size from 0.99ha to 1.71ha.	The amended boundary is noted and the site assessment will be revisited as part of the Regulation 19 HELAA update to reflect the enlarged site and the information submitted to the Regulation 18 consultation.
NDLP3213	Ceres Property				HELAA site promotion Stansted 009 RES	Seeks allocation of HELAA site Stansted 009 RES on the basis that Stansted Mountfitchet is a sustainable location for development and could accommodate a larger proportion of the District's planned growth.	The commentary on the site and the spatial strategy is noted. The Council will consider whether changes are required to the spatial strategy for the Regulation 19 Local Plan, and whether additional site allocations are necessary to meet the housing requirement.
NDLP4236	City and Country Residential Ltd				HELAA site promotion Stansted 010 RES	Promotion of HELAA site and provision of supporting information to demonstrate how constraints identified in the HELAA can be addressed, including assessment of site's contribution to the purposes of the Green Belt	The additional information provided on the previously assessed site is noted and will be reflected in the updated HELAA to support the Regulation 19 Local Plan.
NDLP998	Daniel Jones	Director Silverley Properties Ltd	Sophie Pain		HELAA site promotion Thaxted 014 RES (smaller boundary)	Thaxted 014 RES is resubmitted with a revised site boundary that reduces the site area from 6.03ha to 0.8ha. Supporting information provided to demonstrate how constraints identified in the HELAA can be addressed.	The amended boundary is noted and the site assessment will be revisited as part of the Regulation 19 HELAA update to reflect the reduced site area and the information submitted to the Regulation 18 consultation.
NDLP4006	Pelham Structures Limited	Pelham Structures Ltd			HELAA site promotion Ugley 003 MIX	Promotion of a site in Ugley with additional supporting information	The additional supporting evidence is noted and will be considered through the HELAA update to support the Regulation 19 Local Plan.
NDLP3942	Michael and Sarah Tee				HELAA site promotion Widdington 002 RES and Widdington 003 RES	Promotion of two HELAA sites and provision of supporting information to demonstrate how access and heritage issues can be addressed.	The promotion of the two sites is noted and the additional information provided will be reviewed as part of the Regulation 19 HELAA update.
NDLP667	Robert Fairhead		Vaughan Bryan		HELAA Site Promotion: Land South of Ickleton Road, Great Chesterford (HELAA Ref GtChesterford 009 RES)	Support for the HELAA conclusions on GtChesterford 009 RES and submission of additional supporting information to demonstrate site sustainability	The support for the findings of the HELAA is noted. The new information submitted to support this site will be reviewed as part of the HELAA update for the Regulation 19 local Plan consultation.

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NDLP3824	Taylor Wimpey UK Limited				HELAA site submission Newport 012 RES	Promotion of HELAA site Newport 012 RES. Note that the amber constraints identified in the HELAA are not overriding constraints.	The promotion of the site is noted. As set out in the published HELAA methodology, amber ratings are not considered to be insurmountable constraints to development, but do affect considerations on overall site suitability,. If evidence exists that they can be overcome this will be taken into account in the site selection process.
NDLP3609	Mr Charles Nash	Robert Crawford Associates			HELAA site submission Stebbing 010 RES	Resubmission of site map for Stebbing 010 RES	The resubmitted site map has been noted. We will compare this with existing mapping for the site to ensure that the site boundary remains consistent with the map provided.
NDLP2925	Paul Cronk				Henham 006 RES does not adequately reflect planning history and site capacity	The submitted site boundary for Henham 006 RES is larger than the boundary of the site which has been granted permission for development of 200 homes. Seeks the allocation of the remainder of the site to deliver additional dwellings.	The planning history of the site has been noted and the Council will consider whether it is appropriate to allocate the remainder of the site for additional development in the Regulation 19 Local Plan.
NDLP3771	Harlow Agricultural Merchants Ltd				Heritage Assessment 2022 not publicly available	HELAA site Newport 013 RES is identified as being in a medium-high heritage sensitivity area but the evidence supporting this has not been published.	The heritage sensitivity areas are defined in the Uttlesford District Heritage Sensitivity Assessment Stage 1: Towns and Key Villages report produced by Oxford Archaeology in 2022. This report shows the site in question as being within a medium-high sensitivity areas. The report will be published to support the Regulation 19 plan and the HELAA methodology updated to include clearer signposting to the relevant evidence base.
NDLP3824	Taylor Wimpey UK Limited				Inaccurate HELAA site capacity	The indicative capacity in the HELAA for Newport 012 RES does not reflect the site promoter's assessment of capacity.	As set out in the HELAA methodology, the development potential of each site is calculated using a standardised density assumption. Whilst it is recognised that individual proposals are likely to vary from the standardised capacity, it is important to provide a consistent means of assessment for all sites to inform the site selection process. We do not propose to change this approach for the Regulation 19 HELAA.
NDLP3929	Pelham Structures Limited				Inconsistency between HELAA and SA site assessments	There is a conflict between the criteria-based scoring in the HELAA and the assessment in the Sustainability Appraisal.	The HELAA is a high-level assessment of potential suitability based on a range of constraints, not all of which are related to sustainability. Therefore the scope and purpose of the two assessments are different.
NDLP498	Nigel Tedder	Managing Director New Homes Project Managements Limited	Nigel Tedder		Lack of clarity of capacity of sites with permission	The HELAA capacity does not reflect planning permissions granted for sites.	The HELAA is intended to illustrate the potential future capacity of available land in the District. Sites with permission are captured within the data on completions and commitments which will be revisited for the Regulation 19 Local Plan. Their capacity has been set at zero in the HELAA to avoid double counting of capacity. This will be clarified in the updated HELAA methodology.
NDLP2906	Debden Parish Council				Larger Village Housing Requirement	The HELAA capacity and the housing requirement at Larger Villages does not take account of issues raised within past development management decisions.	The planning history for sites will be revisited as part of the HELAA update and, where appropriate, the

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							conclusions will be reflected in the larger villages housing requirements.
NDLP3732	Enterprise Residential Development				LtChesterford 002 RES is a Great and Little Chesterford Neighbourhood Plan allocation	The promoted site is already allocated in the Great and Little Chesterford Neighbourhood Plan, which was made in February 2023.	It is also noted that the site benefits from an allocation in the recently made Neighbourhood Plan, and at present we do not propose to duplicate neighbourhood plan allocations as non-strategic allocations within the Local Plan,
NDLP2273	Mulberry House Farms LLP				New site submission (Arkesden)	Promotion of a site in Arkesden for residential development which was previously assessed for employment use.	The site was assessed for employment use in the Regulation 18 HELAA. Its resubmission for residential use is noted, and the site will be assessed through the HELAA update to support the Regulation 19 Local Plan.
NDLP4167	Mulberry House Farms LLP						
NDLP4231	City and Country Residential Ltd				New site submission (Birchanger)	Promotion of 7 parcels of land which form part of a larger site assessed in the HELAA (Birchanger 004 MIX).	It is noted that the new parcels of land form part of a larger previously assessed site (Birchanger 004 MIX). The site boundaries and the supporting information provided will be considered as part of the HELAA update which will inform the Regulation 19 Local Plan.
NDLP3165	Adam Davies				New site submission (Clavering)	Promotion of a new site in Clavering for residential development	Noted. The new site and the supporting evidence provided will be considered as part of the HELAA update which will inform the Regulation 19 Local Plan.
NDLP3499	Lois Partridge				New site submission (Felsted)	Promotion of a new site at Bannister Green, Felsted for residential development	Noted. The new site and the supporting evidence provided will be considered as part of the HELAA update which will inform the Regulation 19 Local Plan.
NDLP4166	Threadneedle Curtis Limited				New site submission (Great Hallingbury)	Promotion of a new site in Great Hallingbury for residential and employment development	Noted. The new site and the supporting evidence provided will be considered as part of the HELAA update which will inform the Regulation 19 Local Plan.
NDLP3726	CH Gosling 1965 Settlement				New site submission (Hatfield Broad Oak)	Promotion of a new site in Hatfield Broad Oak for residential development	Noted. The new site and the supporting evidence provided will be considered as part of the HELAA update which will inform the Regulation 19 Local Plan.
NDLP3718	CH Gosling 1965 Settlement						
NDLP4009	Pelham Structures Limited				New site submission (Henham)	Promotion of a new site in Henham Parish for residential development	Noted. The new site and the supporting evidence provided will be considered as part of the HELAA update which will inform the Regulation 19 Local Plan.

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NDLP1419	Mr James Goodchild						
NDLP3410	Montare LLP						
NDLP4011	Pelham Structures Limited	Pelham Structures Limited			New site submission (Manuden)	Promotion of two new sites in Manuden for residential development	Noted. The new sites and the supporting evidence provided will be considered as part of the HELAA update which will inform the Regulation 19 Local Plan.
NDLP3596	Pegasi Limited				New site submission and promotion of existing HELAA site QuendonR 004 RES	Submission of masterplan for two linked sites in Rickling Green	We note the promotion of the existing HELAA site and will consider the supporting information as part of the HELAA update which will inform the Regulation 19 Local Plan. We also note the submission of the new site for employment, retail and community uses and the connecting public realm. We will assess the new site as a separate site in the HELAA update (QuendonR 005 EMP).
NDLP1167	Charlotte McNeilly				Objection to HELAA site Clavering 007 RES	Concerns over: heritage and landscape impact, increased loss of flooding, lack of access, location within pollution control zone 500m radius and loss of agricultural land	Noted. The information provided will be considered as part of the HELAA update to support the regulation 19 Local Plan, and suitability conclusions will reflect the identified constraints where appropriate.
NDLP2144	Luke King				Objects to HELAA site assessment conclusion (non-promoter)	Third party objection to conclusions on HELAA site Clavering 007 RES on the grounds of surface water flood risk and drainage, potential biodiversity, impact on settlement character and amenity (Public Right of Way), access and heritage.	Noted. The information provided will be considered as part of the HELAA update to support the regulation 19 Local Plan, and suitability conclusions will reflect the identified constraints where appropriate.
NDLP402	Louise Johnson	Parish Clerk Elsenham Parish Council			Omissions from HELAA appendix site maps and proformas	Identification of two sites in Elsenham with planning permission that are not shown in the HELAA map and proformas. Identification of an omitted parcel of Elsenham 008 RES. Identification of inconsistency in parish boundary to the east of Elsenham.	Whilst the HELAA does include sites with planning permission, it does not act as a record of all sites with planning permission in the District. The identified sites west of Hall Road and south of Bedwell Road were not submitted for consideration through the call for sites, although Land south of Bedwell Road was subsequently submitted outside the call for sites process and will be incorporated into the HELAA update to support the Regulation 19 Local Plan. Similarly, the Land west of Isabel Drive (Elsenham 008 RES) was assessed as submitted - no second parcel was submitted for consideration. The inconsistency in the parish boundary is noted and this will be updated for Regulation 19.
NDLP3995	Pelham Structures Limited	Pelham Structures Limited			Planning history not sufficiently taken into account	The extant permission for 32 dwellings and resolution to grant a further 30, as well as the sites' combined capacity of up to 400 homes has not been appropriately considered.	The assessment of the three sites does take into account the extant permission and this is reflected in the site classification. Planning history will be revisited as part of the Regulation 19 HELAA update and amended where necessary.
NDLP973	Catesby Estates Ltd	Director Roebuck	Stacey Rawlings		Site capacity does not take account of constraints	The capacity identified in the HELAA for GtChesterford 002 RES does not account for the presence of a scheduled monument.	The Regulation 19 HELAA will include an updated capacity which reflects the presence of significant constraints in accordance with NPPF Footnote 7. The updated information submitted in the representation

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
	(Stacey Rawlings)	Land and Planning Ltd				Outline planning application demonstrates how amber constraints identified in HELAA in relation to highways, flood risk, TPOs, Public Rights of Way and archaeological sites can be addressed.	and the outline planning application will be reviewed as part of the HELAA update.
NDLP2270	J Noble				Submission of two new sites and one updated HELAA site at Clavering	Two new sites promoted for consideration in Clavering, along with an adjustment to the boundary of Clavering 003 RES.	Noted. The updated site boundary for Clavering 003 RES will be reflected in the HELAA which will inform the Regulation 19 consultation. The two new sites will be considered as part of the HELAA update.
NDLP2241	Ian Butcher				The Local Plan should allocate commitments and completions (employment)	The Local Plan allocations should include committed and completed employment sites which contribute to land supply.	We will consider whether to include non-strategic allocations and allocations of sites with extant permission in the Regulation 19 version of the Local Plan.
NDLP2249	Ian Butcher						
NDLP2318	Paul Cronk				The Local Plan should allocate LtEaston 006 RES due to the allowed appeal on land adjacent to the site.	Notes the outcome of recent planning applications and appeals which have led to permission being granted for development on adjacent sites. Proposes the site should be allocated due to its proximity to other committed sites.	Noted. The site selection process will be revisited to inform the Regulation 19 Local Plan.
NDLP2319	Paul Cronk						
NDLP973	Catesby Estates Ltd (Stacey Rawlings)	Director Roebuck Land and Planning Ltd	Stacey Rawlings		Updated planning history	Updated planning history is provided for GtChesterford 002 RES which proposes a lower quantum of development than the indicative capacity shown in the HELAA.	The planning history for the site will be revisited as part of the HELAA update. The approach to indicative capacity will remain the same in order to provide a consistent means of comparing site capacity, although it is recognised that individual proposals will vary from the standardised assumption applied in the HELAA.
NDLP3929	Pelham Structures Limited	Pelham Structures Limited			Windfall allowance not justified	The windfall allowance is unjustified because there is a finite supply of windfall sites and the availability of such sites is expected to reduce over the plan period.	The windfall allowance has been calculated on the basis of historic delivery rates which demonstrates average completions since 2012/13 exceed the allowance in the emerging Local Plan. This analysis does not indicate a decline in the availability of small sites over this period. The windfall allowance recognises the contribution of small sites to the District's housing supply and encourages the recycling of land in sustainable locations, but it is not considered necessary to allocate small sites which can be progressed through the development management process in accordance with the emerging spatial strategy.

Table 4: Housing Site Selection Topic Paper

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP2052	Mrs Jacqueline Cooper				Site Selection - Clavering	This comment notes that there are no preferred options in the draft Plan for the sites put forward by landowners in Clavering. The respondent assumes that this means none of the sites in Clavering are suitable for larger villages	The Housing Site Selection Topic Paper summarises our approach to selecting strategic sites proposed for housing allocation with the Regulation 18 Consultation version of the Uttlesford Local Plan. As

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
						allocation, noting potential landscape impacts and cumulative impacts on the villages' character.	explained in Paragraph 1.9-1.11 of the Site Selection Topic Paper, the draft Reg 18 Local Plan does not identify any non-strategic sites below 100 dwellings for allocation, but does identify housing requirement figures for our Larger Villages. The Consultation invites Parish Councils and neighbourhood planning groups to consider if they wish to take responsibility for planning for any non-strategic development in their villages through a future Neighbourhood Plan or Neighbourhood Plan update. Consideration of potential non-strategic sites will be undertaken following the consultation to inform the Reg 19 plan in consultation with relevant parishes.
NDLP1250	Elsenham				Site Selection - Elsenham	A number of respondents seek greater clarity on why there are no proposed strategic allocations at Elsenham (Local Rural Centre). It is suggested that further sites at Elsenham should be considered, including an alternative site proposed immediately to the north and east of the residential development recently granted permission on appeal for up to 200 dwellings. It is noted that both Elsenham and Henham does not have a Neighbourhood Area designation at present.	Noted. This matter is set out in the Sites Selection Topic Paper. There are a number of sites at Elsenham that are suitable for development, but these all already have planning permission and account for c 1,000 dwellings coming forward at this settlement. However, this position will be reviewed again to inform Regulation 19 as part of the Housing and Economic Land Availability Assessment considering revised site information and new sites submitted.
NDLP2926	Paul Cronk						
NDLP2928	Paul Cronk						
NDLP2926	Paul Cronk	Agent Grosvenor Property UK	Claire Galilee		Site Selection - Great Chesterford	A number of respondents seek greater clarity on why there are no proposed strategic allocations at Great Chesterford, which is a Local Rural Centre in the settlement hierarchy. It is noted that the Great and Little Chesterford Neighbourhood Plan was adopted in February 2023.	As noted in the Housing Site Selection Topic Paper, there were a number of sites considered at Great Chesterford, but these were all ruled out for various reasons as explained in Appendix A Stage 1 to Stage 5 Site Selection Assessment. Some sites were identified as having potential, but some of these are either not available, have issues (such as access being required through a neighbouring district and thus not being deliverable at the current time) and/ or being at an advanced stage of a planning application process where significant objections were raised by statutory consultees. The potential for large standalone Garden Communities are addressed separately. It should be added however that the Council need to prepare an update their plan every five years and given the gap since Uttlesford last updated their plan, it is proposed that the next plan should be adopted in 2030/31 - thus there will be early opportunity to review potential development opportunities at Great Chesterford, at which time planning for neighbouring Greater Cambridge may be clearer. The HELAA and Site Selection Process will be reviewed and updated to inform the Reg 19 Plan.
NDLP3734	Enterprise Residential Development						
NDLP1123	Guy Kaddish						
NDLP3211	Ceres Property				Site Selection - Green Belt	A number of comments suggests that the Council should further consider whether some or all of the sites located within the Green Belt could represent a more sustainable pattern of development for the District. It is suggested that strategic policy-making authorities are required to consider releasing Green Belt land, amongst other things where it is in a location that is well served by public transport.	No sites in the Green Belt are allocated for development since sufficient areas of suitable land for housing have been proposed and appraised as suitable elsewhere. The Council undertook a review of the Green belt boundaries in 2023. There is no justification for conflict with this policy position.
NDLP3750	Denise Gemmill						

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP2926	Paul Cronk				Site Selection - Hatfield Heath	A number of respondents seek greater clarity on why there are no proposed strategic allocations at Hatfield Heath, which is a Local Rural Centre in the settlement hierarchy.	Hatfield Heath falls entirely with the Green Belt and as such has not been considered for strategic development. It is demonstrated by this paper that there are more than sufficient sites available to meet the housing need elsewhere in the district and for that reason, it is considered that 'exceptional circumstances' would not exist to justify development in the Green Belt.
NDLP497	Nigel Tedder	Managing Director New Homes Project Management s Limited	Nigel Tedder		Site Selection - Larger Villages	it is suggested that the Housing Site Selection Topic Paper should be expanded to review sites at Larger Villages.	Noted. Consideration of potential non-strategic sites will be undertaken following the consultation to inform the Reg 19 plan in consultation with relevant parishes.
NDLP3476	Richstone Procurement Ltd						
NDLP2052	Mrs Jacqueline Cooper				Site Selection - Mapping	It is suggested that the maps in Appendix A is out of date as some of the sites already have planning permission or are under construction.	The published maps, as per the Housing and Economic Land Availability Assessment, reflect a snapshot in time. The respective planning status of individual sites will be reviewed to the inform the Reg 19 plan.
NDLP970	Catesby Estates Ltd (Stacey Rawlings)	Director Roebuck Land and Planning Ltd	Stacey Rawlings		Site Selection - Methodology	It is noted that Appendix A only provides a basic summary of why sites have been or have not been selected for allocation.	Appendix A seeks to provide a summary of the assessment undertaken. The Site Selection process is informed a proportionate range of available technical evidence, engagement with selected stakeholders and the review of relevant planning history, as summarised Paragraph 3.18 and 3.34 of the Topic Paper. The assessment undertaken for Stage 1 and Stage 4 were also documented in detail through the Housing and Economic Land Availability Assessment and the Sustainability Appraisal.
NDLP3874	Grosvenor Property UK				Site Selection - New Settlements	This comment seeks greater clarity on how new settlements have been considered and assessed through the site selection process, particularly in relation to the wider evidence base on landscape, heritage and viability. It is further suggested that proposals for a future garden community at North Uttlesford should be considered to support economic growth at Uttlesford and the greater Cambridge area, and that an alternative Garden Communities proposals should be tested through the Sustainability Appraisal. Viability and deliverability evidence for the promoted site has been submitted.	Large Garden Communities capable of delivering 5,000 homes or above have been considered through the SA and the Site Selection process, and are considered inappropriate for further consideration in this Local Plan to avoid over relying on the delivery of single sites above the identified need to be accommodated on strategic sites without adequate evidence to demonstrate their viability. This reflects the Inspector's comments on previously rejected plans, which stresses the need to allocate more small and medium sized sites that could deliver homes in the short to medium term and help to bolster the five year housing land supply. This does not mean larger scale development would not be appropriate for consideration in the longer term through the next Plan. The Plan does plan for at least a 15 year
NDLP3877	Grosvenor Property UK						

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
							period, being expected to be adopted c. April 2026 and the Plan period running to 2041.
NDLP3698	Newport Parish Council	Newport Parish Council			Site Selection - Omission Site (Newport 012,013)	Highlights exisiting good access from Widdington turn to access the site at Newport 012/013, this is supported by a transport appraisal provided. Also disagreement with the potential designation of Newport Pond Chalk Pit. Overall promotion of the omitted sites citing road links and local wildlife site designation.	The Housing and Economic Land Availability Assessment and Site Selection Topic Paper outline the methodology undertaken and will be reviewed taking into account new information or sites submitted through the Regulation 18 Consultation.
NDLP3772	Harlow Agricultural Merchants Ltd						
NDLP973	Catesby Estates Ltd (Stacey Rawlings)	Director Roebuck Land and Planning Ltd	Stacey Rawlings		Site Selection - Omission Site (GtChesterford002 RES)	This comment notes that GtChesterford 002 RES should not have been rejected through the Site Selection process. It is noted that the site capacity has been tested through an outline planning application proposing up to 350 units, with the majority of the HELAA constraints identified as being suitable or capable of mitigation.	The Housing and Economic Land Availability Assessment and Site Selection Topic Paper outline the methodology undertaken and will be reviewed taking into account new information or sites submitted through the Regulation 18 Consultation. GtChesterford 002 RES is identified as a Clear Omission Site at Stage 3 of the Regulation 18 site selection process. Consultation with Historic England identifies the potential development impacts on the Scheduled Ancient Monument as significant and could not be appropriately mitigated.
NDLP2064	Clare College Cambridge				Site Selection - Omission Site (GtChesterford009 RES)	The site promoter for GtChesterford009RES notes that they are prepared to work with Uttlesford and South Cambridgeshire District Councils to deliver growth in this location should it be considered appropriate in the future.	Willingness to work with the District Councils noted.
NDLP3995	Pelham Structures Limited	Pelham Structures Ltd			Site Selection - Omission Site (GtDunmow042RES, GtDunmow003RES and GtDunmow019RES)	This comment seeks further consideration of Land at St Edmunds Lane and provides further site-specific information. It is noted that the site has a proposed capacity of 400 dwellings, and part of the site already has planning permission. The promoter noted that the site is highly sustainable, within 10 minutes' walk of the town centre, with easy access onto the A120 and is relatively well screened from wider views.	The Housing and Economic Land Availability Assessment and Site Selection Topic Paper outline the methodology undertaken and will be reviewed taking into account new information or sites submitted through the Regulation 18 Consultation.
NDLP1079	Luxus Homes Stoney Common Limited	Director Luxus Homes Stoney Common Limited	Peter Biggs		Site Selection - Omission Site (Stansted003RES)	This comment notes that Stansted003RES was discounted at Stage 2 Site Sifting as it was unable to deliver 100 homes or above individually or cumulatively.	The approach undertaken is consistent with our site selection methodology for selecting strategic sites, defined as sites that could potentially accommodate 100 dwellings or more individually or cumulatively.
NDLP3213	Ceres Property				Site Selection - Omission Site in the Green Belt (Stansted009RES)	This comment notes that Stansted 009 RES performed well in the HELAA but has been excluded as a proposed allocation since all sites located within the Green Belt were automatically discounted without further assessment. The representation suggests that the site is in a sustainable location from a transport and access to employment perspective, and that a larger proportion of the District's growth should be directed to the site near Stansted Mountfitchet, rather than in the proposed allocation.	No sites in the Green Belt are allocated for development since sufficient areas of suitable land for housing have been proposed and appraised as suitable elsewhere. The Council undertook a review of the Green Belt boundaries in 2023. There is no justification for conflict with this policy position.
NDLP985	Mary Power	Director Richstone	Mary Power		Site Selection - Stebbing	This comment highlights that the sites considered through the Housing and Economic Land Availability Assessment stem from the 2021 Call for Sites. Richstone sought	The Housing and Economic Land Availability Assessment considers a wide range of site sources in line with the Planning Practice Guidance. While

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
		Procurement Limited				planning permission for a site in Stebbing for 60 dwellings, which is assessed as Parcel 1D in the LUC Landscape Sensitivity Assessment as having low to moderate landscape sensitivity. Richstone argues that the site, along with three other land parcels, could potentially meet Stebbing's housing requirement, which has not progressed onto Stage 4 of the site selection process. Richstone criticizes this decision as illogical as it has not considered the possibility of multiple sites collectively meeting the housing requirement. It is also noted that the assessment has not referenced Stebbing Neighbourhood Plan's landscape evidence.	<p>sites identified through the Call for Sites 2021 make up a majority of sites submitted, new sites submitted through the Regulation 18 Consultation are now also being considered as part of our ongoing update of the evidence base.</p> <p>The Housing Site Selection Topic Paper focuses on the selection of strategic sites which could individually or cumulatively with adjacent sites deliver 100 homes or more. Stebbing is identified as a Larger Village, where non-strategic allocations are to be identified either through the relevant Neighbourhood Plan or through the Regulation 19 Plan where Town or Parish Councils choose not to prepare one.</p>
NDLP2565	Geoff Bagnall				Site Selection - Takeley	Highlights concerns over approach taken in site selection topic paper to heritage assets for Takeley 007 MIX, Takeley 016 RES and LtCanfield 003 RES.	The council is content that sufficient consideration is given to Heritage Assets in the site selection assessments and HELAA but this needs to be balanced with the sustainability of Takeley as a settlement, being identified as a Local Rural Centre in the Settlement Hierarchy..

Table 5: Green Belt Study Update

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP1082	Luxus Homes Stoney Common Limited	Director Luxus Homes Stoney Common Limited	Peter Biggs		GB Designation at Stansted Mountfitchet	It is suggested that whilst the majority of sites considered by the GB review were deemed to make a strong contribution to GB purposes, there is one site, at Stansted Mountfitchet, that makes a more moderate contribution to the purposes. And, for that reason, it is suggested that the site should be allocated for non-strategic housing.	Noted. This matter will be reviewed to inform the Reg 19 Plan. ECC has requested that land at Stansted Mountfitchet is safeguarded for future expansion of the Secondary School and the Neighbourhood Plan group are looking at potential opportunities for limited development. These matters will be considered in the round.
NDLP1512	Natural England				GB Enhancements	Natural England welcomes the opportunities listed in Chapter 5 of the Green Belt Study to enhance the Green Belt to address issues of flood risk, limited and fragmented woodland cover, limited habitat connectivity, recreational pressures within the District and limited access to semi-natural green space, as well as poor	Noted. This matter will be reviewed to inform the Reg 19 Plan.

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
						water quality in some watercourses. The Green Belt Study cross references enhancement opportunities with the Uttlesford Green and Blue Infrastructure (GBI) Strategy (2023), which is welcome; we have commented below on the GBI Strategy. Natural England would emphasise the need to provide costed actions and consider where funding for enhancements will come from, in order to achieve the stated aims.	

Table 6: Rural Area and Large Village Housing Requirement Topic Paper

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP1042	Jackie Deane	Parish Clerk Takeley			Disagree with numerical approach and reliance on HELAA capacity to deliver the numbers	The methodology for distribution scenarios are numerical and are not sensitive to local settlement patterns and the HELAA assessments have clearly been reworked to provide potential housing numbers to fit the outcome required by the for each large village	The scenarios are numerical as they have been designed to weight the relative sustainability of the Larger Villages to arrive at a fair and proportionate split of the larger villages allowance. The HELAA capacity has been used as an input to ensure the numbers are deliverable, but they have not been 'reworked' to provide predetermined numbers. The HELAA process has treated all sites equally.
NDLP1057	Jackie Deane	Parish Clerk Takeley					
NDLP1126	James Balaam	G W Balaam & Son	Matthew Thomas		Disagree with scenarios 1 and 2 as it does not taken into account sustainability credentials	We have specific concerns around the weight afforded to scenarios 1 and 2. The Local Planning Authority should be seeking to allocate appropriate levels of development to the most sustainable locations. Simply apportioning the housing requirement evenly across the Larger Villages is not appropriate as it fails to recognise the unique sustainability credentials of each village in turn.	Scenario 1b is designed to split the larger villages allowance evenly incorporating the commitments and completions data. As one scenario that has been averaged out it does not unduly skew the figures.
NDLP988	Mary Power	Director Richstone Procurement Limited	Mary Power		General comment	General comment summarising the approach taken in the plan and topic paper.	Comment noted.
NDLP402	Louise Johnson	Parish Clerk Elsenham Parish Council			Henham vs Elsenham data	Completions and commitments data has not been taken into account properly at Elsenham and Henham. Sites at Elsenham in Henham Parish should be used to rule out more new houses in Henham.	The data for Henham settlement excludes figures at Elsenham settlement, however this will be made clearer in an update for Regulation 19. The mismatch between Parish level and Settlement level data will be fully addressed.
NDLP848	Allison Ward	Parish Clerk High Easter Parish Council	Allison Ward		High Easter HELAA sites are not located adjacent to the village	High Easter HELAA sites are not located adjacent to the village	The HELAA data used in the Topic Paper for Regulation 18 was based on Parish level data rather than settlement data. This is an oversight that will be addressed at Regulation 19 stage.
NDLP402	Louise Johnson	Parish Clerk Elsenham Parish Council			No regard to availability of sites.	No regard has been had to the availability of sites in the topic paper.	HELAA data has been used to inform the numbers, ensuring that the housing requirement numbers can be delivered based on suitable, available and achievable sites. However, the Topic Paper for Regulation 18 was based on Parish level data rather

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
							than settlement data. This is an oversight that will be addressed at Regulation 19 stage.
NDLP402	Louise Johnson	Parish Clerk Elsenham Parish Council			No regard to infrastructure capacity.	Insufficient regard has been had to infrastructure capacity in determining these numbers	The housing requirement figures are based on completions, commitments, population data and settlement hierarchy scoring to disaggregate the allowance set in Core Policy 2. The decision over specific site allocations and infrastructure requirements is something to be dealt with through Neighbourhood Plans or at Regulation 19 stage if Neighbourhood Plans are not being prepared.
NDLP2223 NDLP935	N/A Great Easton and Tilty Parish Council	Clerk Hatfield Broad Oak Parish Council Clerk/Responsible Financial Officer Great Easton and Tilty Parish Council			Parish vs settlement data	The data in the topic paper is presented for the Parish whereas the settlement hierarchy should refer to the specific settlement. This can artificially inflate the scores where multiple settlements exist within a Parish	The HELAA data used in the Topic Paper for Regulation 18 was based on Parish level data rather than settlement data. This is an oversight that will be addressed at Regulation 19 stage.
NDLP3828	Hillrise Homes Limited				Scenario 1a should be discounted	Scenario Option 1a is an average split across settlements. This is a crude methodology, taking no account of village population sizes or facilities and so should be discounted as any basis for housing distribution.	Scenario 1a is included for balance to show what the impact would be if all Larger Villages were to be treated equally. As one scenario that has been averaged out it does not unduly skew the figures.
NDLP1126	James Balaam	G W Balaam & Son	Matthew Thomas		Scenario 3 should carry the greatest weight as it reflects relative sustainability	Scenario 3 should carry the greatest weight as it reflects relative sustainability	A weighting approach between the scenarios has not been applied, the scenarios have been simply averaged out. Relative sustainability is one consideration in setting a housing requirement figure, which the NPPF states at paragraph 67 should reflect the overall strategy for the pattern and scale of development and any relevant allocations.
NDLP499	Nigel Tedder	Managing Director New Homes Project Managements Limited	Nigel Tedder		Sites that can improve or provide new village facilities should be given more support	Sites that can improve or provide new village facilities should be given more support	The decision over which sites to allocate will be made by Neighbourhood Plans or at Regulation 19 stage, where site-specifics such as the provision of facilities and impact on infrastructure can be taken into account.

Table 7: Housing Delivery

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
No comments submitted							

Table 8: Housing Trajectory 2021-2041

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP3608 NDLP3908	Knight Frank Pelham Structures Limited	Pelham Structures Ltd			5-Year Housing Land Supply Requirement	Some comments suggest that the Local Plan does not prioritise short term housing delivery sufficiently and that the Council may not be able to demonstrate a 5-year land supply upon the point of adoption of the Local Plan.	The Council are confident that they will be able to demonstrate in excess of a 5-year land supply at the point of adoption of the Local Plan. This can be demonstrated using the figures within the Housing Trajectory (assuming a point of adoption of April 2026) and is achievable due to the substantive number of 'Outline' permissions which have been granted in recent years which are projected to be delivered in the short-medium term, alongside the delivery of non-strategic allocations and any windfall sites.
NDLP3870 NDLP4232	Grosvenor Property UK City and Country Residential Ltd				General Comment	<p>This comment reviews the Housing Trajectory 2021-2041 and makes the following points:</p> <ol style="list-style-type: none"> 1. There is significant disparity between the housing completions figures published by the Council and DLUHC relating to the first two years of the Local Plan. 2. Within the trajectory there is an element of double counting. This relates to overlap between the figures calculated for the northern Saffron Walden allocation and an existing permission. 3. The lead-in times stated by the trajectory are overly optimistic in relation to the three largest allocations, Takeley, Great Dunmow, and Saffron Walden. 4. The Council's buffer shown above the Local Housing Need is too small and should be increased to 20%. 5. The Housing Trajectory should be bolstered in the later years of the Local Plan period, potentially through the allocation of a new settlement within the district. 	<p>The comments made are noted.</p> <ol style="list-style-type: none"> 1. The housing completions have been accurately recorded through the Council's annual monitoring exercise and the disparity with the data DLUHC have available will be investigated and rectified. 2. The Council acknowledge an element of double counting relating to the northern Saffron Walden allocation and will rectify this for the Regulation 19 version of the Housing Trajectory. 3. The Council deem that the lead in times and build out rates for the committed and allocated developments are appropriate, but will review this element for the next draft of the Housing Trajectory and will seek to provide more evidence of delivery where necessary. 4. The Council consider that a 20% buffer would be excessive, however, the headroom allowed above the Local Housing Need is set to be significantly increased from the Regulation 18 plan, which demonstrated a 5% surplus. 5. For the reasons set out within the Sustainability Appraisal, the allocation of a new settlement within Uttlesford is not deemed to be a 'reasonable alternative' and thus is not being pursued through the Regulation 19 plan.

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP402	Louise Johnson	Parish Clerk Elsenham Parish Council			Updates to the Housing Trajectory	The comment notes a number of changes that have occurred, either by way of new permissions or the commencement of development, at a number of sites listed within the Housing Trajectory.	Noted. The Housing Trajectory provides a description of the status of housing commitments/completions as they were at 1st April 2023, so as to align with the Council's annual monitoring exercise. The Housing Trajectory will be refreshed for the Regulation 19 Local Plan and will include any new permissions or development updates up to the 1st April 2024.

Table 9: Employment Needs Update

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP1706	Rosper Estates Ltd				Agree with the market analysis	The market analysis in the Employment Needs update is agreed with and supported; however there is disagreement with the recommended policy solution.	The agreement with the market analysis is noted.
NDLP3482	Allison Evans				Comment about the use of historic data informing the employment need.	Comment about the use of historic data informing the employment need.	Historic data is one part of the methodology to estimate employment needs within the Employment Needs Update which also takes into account economic projections, feedback from the local agents and CoStar trends. Paragraph 5.56 and 5.57 state "5.56 The trend based VOA, AMR completions and CoStar trends are considered the most useful models for future industrial needs and all point to a need of around 50 ha. The CoStar forecast outlook in their model does not accord with the property market feedback or historic position, which suggests it underestimates needs. 5.57 It is recommended that the needs derived from the CoStar model is used of 52.1 ha or 234,500 sq. m because this enables differentiation between Stansted / non Stansted specific trend. The Stansted element would therefore be 80,700 sq. m and the remainder of the district 153,800."
NDLP902	Jessica Allsopp	Assistant Planner CBRE	Jess Allsopp		Disagree about overall margins	The use of a margin to allow flexibility should be applied to the whole employment needs assessment through the various models considered rather than in different ways	The consultants "consider that it would be prudent to include a 'margin' to provide for some flexibility, recognising: The potential error margin associated with the forecasting process; To provide a choice of sites to facilitate competition in the property market; and To provide flexibility to allow for any delays in individual sites coming forward." Paragraph 5.41 states "There are different approaches to identifying a margin, using either a number of years of past take up (i.e. completions, typically 2-5 years) or 10-20% of future need with 20% used here." The margin is therefore the upper end (20%) of the figures suggested. The 20% figure is based on the need, which varies across the different models.

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP902	Jessica Allsopp	Assistant Planner CBRE	Jess Allsopp		Disagree about plot ratio assumptions	Market evidence confirms that plot ratios for industrial and distribution sites will be closer to 30% than the 40-50% envisaged as developers are providing greater amenity space and land to meet BNG requirements.	The Employment Needs Update uses the following Plot Ratios: 0.3 for office and R&D uses; 0.4 for industrial uses; and 0.5 for warehouse / distribution floorspace. This is based on the experience of the consultants who have undertaken comparable studies in other locations and has been tested through local market engagement. It is possible that BNG requirements may impact plot ratios however this is site-specific dependent on the baseline value of the site and in any case there is the potential for off-site BNG provision to deliver a policy compliant level of BNG. It is noted that many of these identified by CBRE are large scale logistics parks / very large units which may not be applicable to mid and smaller developments in Uttlesford. Plot sampling for Uttlesford is table from existing developments in the district.
NDLP902	Jessica Allsopp	Assistant Planner CBRE	Jess Allsopp		Disagree about the spatial distribution of employment land needs between Stansted and the rest of the district	CBRE have undertaken our own analysis of the property market and reviewed the evidence in the Employment Land Needs Assessment Update and concluded that 65% of needs should be focused around Stansted Airport and the M11/A120, with the remaining 35% apportioned to the remainder of the District. CBRE have set out alternative employment land forecasts, which conclude that for the area around Stansted Airport and the M11/A120 adjacent 57.5 ha of land should be allocated for industrial and logistics uses. This is significantly more than the 17.9 ha currently proposed. Taking into account existing commitments at Northside this would require further allocations of 29.1ha.	The recommendations for employment land shows that out of the 30.4ha residual need for industrial land (paragraph 6.13) beyond Stansted airport 15ha of the need is at Stansted; 5-10ha is at Great Dunmow (along the A120) and 5ha is needed at Saffron Walden. The majority of need is at Stansted and the A120 corridor. The Reg 18 draft makes provision for 30ha of industrial land at Great Dunmow and Takeley.
NDLP1706	Rosper Estates Ltd				Disagree with recommendation for a single site in the Stansted area to improve deliverability	The conclusion in the Employment Needs Update the solution, of a single large employment site of 15 ha, means that the entirety of new provision is focused in a single location and its delivery is controlled by a single party. The benefit of multiple locations is that it provides choice for the market, is likely to provide a greater range of premises, and ensures that new supply is not dependent upon the decisions of a single landowner.	The point around dispersal of more and smaller employment sites is noted however the proposal in the plan is to over-allocate relative to the residual employment need in order to ensure that need is met in full. The employment site selection topic paper sets out the rationale for this approach and the selection of the sites allocated within the plan.
NDLP1827	Essex County Council				Economic and Employment Strategy should be updated.	Essex County Council recommends that Uttlesford District Council updates its Economic and Employment Strategy, and that the Local Plan is in accordance with this.	The Council has no plans to produce an Economic and Employment Strategy before Regulation 19 consultation in time to inform the Local Plan. The Local Plan is informed by the latest available evidence containing a review of qualitative and quantitative needs, which in turn is informed by engagement with local agents and the business community
NDLP634	Matt Brewer	Director Urbanspace Planning Ltd	Matt Brewer		Employment allocations not shown correctly on diagrams within the plan	The employment allocations in Core Policy 4 do not match the key diagram	This is a mistake in the Reg 18 plan. The text is correct whilst the diagram at Figure 4.2 needs to be updated for Reg 19.

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP4153	Endurance Estates Land Promotion Ltd				Evidence base may not adequately assess employment need	The evidence base may not have adequately accounted for suppressed demand and future drivers, particularly relating to the industrial and logistics sectors. An alternative calculation by CBRE has been provided which states 29.1ha should be provided for in the Stansted area instead of the 17.9ha proposed.	The Employment Needs Update utilises a number of information sources to identify qualitative and quantitative employment need in the district for R&D, office and industrial and logistics uses. Low vacancy rates and consequential suppressed demand has been factored in to the assessment, and a 'flexible margin' has been utilised in order to recognise the potential error margin associated with the forecasting process; to provide a choice of sites to facilitate competition in the property market; and to provide flexibility to allow for any delays in individual sites coming forward.
NDLP902	Jessica Allsopp	Assistant Planner CBRE	Jess Allsopp				
NDLP3090	Segro				Evidence supports more flexible employment allocation	The conclusions of the Employment Needs Update suggest that the employment allocations within the plan should be flexible in order to meet demand over the plan period.	The greenfield allocations along the A120 corridor within the Reg 18 Local Plan are flexible in order to meet the quantitative and qualitative need within the Employment Needs Update however the allocations at The Elsenham Estate and Chesterford Research Park are more specific given they are expansions of established locations. The proposed policy approach with Core Policy 45, 46 and 47 provide flexibility for alternative development over the plan period subject to criteria being met.
NDLP3090	Segro				Expansion of existing industrial buildings should be supported.	The expansion of existing industrial buildings should be encouraged given the lack of industrial supply within the District	The expansion of existing industrial sites is something that is supported via Core Policy 45 which will be strengthened for Regulation 19 stage with the completion of an updated Employment Land Review.
NDLP3177	Phoenix Life Limited and Mulberry S				General comment	General comment summarising the content of the evidence base and the proposed plan approach.	Comment noted
NDLP4154	Endurance Estates Land Promotion Ltd						
NDLP3090	Segro				General support	The conclusions of the Employment Needs Update are supported, including regarding industrial land in the Stansted area.	The support for the conclusions of the Employment Needs Update are noted.
NDLP902	Jessica Allsopp	Assistant Planner CBRE	Jess Allsopp		Role of Stansted Airport not fully recognised.	The role of Stansted Airport on the local economy is not fully recognised, the airport is one of the largest passenger airports in the UK with connections across Europe, which remains the largest trading partner of the UK. Stansted Airport is also the 3rd largest freight airport in the UK handling close to 250,000 tonnes per annum with the opportunity to grow further from the 14% of additional tonnage over the past 10 years. The airport provides nearly 25% of employment in Uttlesford and contributes 15% of the Districts Gross Added Value from a tiny proportion of its land area. Its role is wider than that of Uttlesford alone being a key asset contributing to the wider economic area from north London through to Cambridge along the M11.	The Employment Needs Update recognises the importance of Stansted Airport to the local and regional economy and notes the dual role that the Northside permission will play providing both strategic scale units and units more likely to meet locally derived employment requirements. As a result it is recommended in the ENU that around half of the Northside supply is discounted from that which can support local needs. The strategic role that Stansted Airport plays in the region has been recognised in the decision to have a bespoke policy for the sustainable growth of Stansted Airport (Core Policy 11) rather than treating it as a typical "Existing Employment Site" under Core Policy 45.

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP2240	Ian Butcher				Site promotion can meet the demand identified in the Employment Needs Update.	A comment is made promoting a site that it is believed is capable of meeting the need identified in the Employment Needs Update.	All sites submitted to the Council are assessed through the HELAA process and then further assessed through the Site Selection Topic Paper. The reasoning behind the choice of selected employment sites is provided in the Employment Site Selection Topic Paper.
NDLP3300	24/7 Investments Limited						
NDLP799	David Adams				Workers at the proposed employment sites would not be able to afford to live in the district	The plan is unsound as existing house prices in Takeley and Dunmow are too expensive for workers in industrial jobs at the proposed allocation sites	The plan seeks to meet employment and housing needs in the most sustainable locations to increase the opportunities for sustainable transport. Existing housing is expensive however new housing would be required to be in accordance with the housing mix set out in the plan, informed by the local housing need assessment, and would deliver affordable housing. This is intended to improve housing affordability over the plan period.

Table 10: Employment Site Selection Topic Paper

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP4163	Threadneedle Curtis Limited				Additional capacity at Northside	Additional capacity from the HELAA at Northside is not reflected in the site selection topic paper or allocations	The Employment Land Review will inform the boundaries of "existing employment sites" in the Regulation 19 draft. The Council also intends to update Core Policy 11 (Stansted Airport) to identify those parts of the airport which are airport related. The Council will consider whether to identify the Northside site as a 'general' employment site or whether given the relationship to the airport whether the site (or part of it) should be part of the Stansted Airport policy area under Core Policy 11. Core Policy 45 allows in principle for the intensification of employment use on existing employment sites whilst Core Policy 46 covers development at allocated employment sites.
NDLP1707	Rosper Estates Ltd				Assumption that industrial and logistics sites would be large units	The site selection process for industrial and logistics allocations is flawed as it assumes that large units would be delivered. The evidence base identifies a need for different sized units.	Employment Needs Assessment Update states "It is recommended that more land is allocated in the Stansted vicinity around Takeley / Bishop's Stortford borders / Stansted Mountfitchet / Birchanger of 15 ha. A larger allocation(s) may be preferable to piecemeal to improve deliverability." By their nature Industrial and Logistics sheds are typically larger units however it is acknowledged that this is not necessarily the case. The evidence base identifies the need for a range of small, medium and large industrial and logistics units. However, given the recommendation for a larger site allocation in the Stansted area in the ENAU, the cumulative impact of multiple smaller shed-type units on a larger site

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
							would still likely have a harmful impact on the rural setting of the airport in the CPZ.
NDLP2242	Ian Butcher				Commitments should be allocated	Committed employment sites (sites with planning permission that have not yet been implemented) that are being relied on to meet the identified employment need should be allocated as employment sites in order to ensure their delivery over the plan period, should permissions not be implemented for any reason.	Committed sites fall between being an "existing employment site" under CP45 and an "allocated employment site" under CP4. It is acknowledged that in the Regulation 18 draft, without the benefit of an allocation if a planning permission lapses there is no policy support to ensure a revised employment scheme can come forward in its place. It is proposed at Regulation 19 stage that employment sites with an extant or recently lapsed permission for employment land are treated favourably for future employment planning applications in the policy. This approach will ensure that for any sites with planning permission during the plan-making process that are not implemented, the presumption of employment uses will have been established.
NDLP3302	24/7 Investments Limited						
NDLP3959	The Streeter Family				Employment Site Selection Topic Paper not clear	The Employment Site Selection Topic Paper is not clear as it does not contain a full list of the 43 sites considered, and there is no clear audit trail explaining at which stage, and why, particular sites (including Gt Hallingbury 004 EMP) were rejected.	The long list of sites is included in Table 9 of the Draft Housing and Economic Land Availability Assessment which was the starting point for the Employment Site Selection Topic Paper. The Topic Paper explains at paragraph 3.4 that the qualitative and quantitative need set out in the Employment Needs Assessment Update means that only the sites promoting research and development, office, industrial and logistics in Saffron Walden, Great Dunmow and the wider Stansted Area are taken forward for assessment, as only those sites are capable of meeting the identified need. Section 4 contains the assessment of the sites and the reasons for selecting the preferred allocations in the Regulation 18 draft. Sites in the rural area such as Great Hallingbury 004 EMP were rejected as they do not fit the spatial strategy and are not capable of meeting the qualitative and quantitative need identified.
NDLP335	Martin Dunn				Lack of detail regarding North of Takeley Street allocation	Query where the employment allocations are made and a request for further clarity.	The allocations are made in Core Policy 4 however it is acknowledged that the allocation mapping is not clear in the Regulation 18 draft. The Regulation 19 draft will provide a detailed Policies Map showing the allocation boundaries and will contain Site Development Templates providing further detail.
NDLP1707	Rosper Estates Ltd				Rejection of employment sites north of the A120 on landscape grounds is unjustified	There is no site-specific evidence to justify the rejection of sites north of the A120, which is effectively a blanket ban. An appropriate (smaller) scale of development may be possible north of the A120 without harm to landscape character.	The recommendation in the Employment Needs Assessment Update is for a larger 15ha allocation to improve deliverability, and Policy CP4 consequently allocates strategic scale employment sites to meet the need. It is considered that such a large allocation north of the A120 would likely have a harmful impact on the rural setting to the airport and the CPZ. The Employment Land Review will look at existing employment sites and the potential for small-scale expansions as non-strategic allocations.

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP3183	Phoenix Life Limited and Mulberry S				Site selection should pick sites that avoid impacts on Hatfield Forest	Employment sites should not be allocated if they may adversely impact Hatfield Forest, including from recreational users and on the watercourse that drains southwards into the Forest.	Hatfield Forest is negatively impacted by recreational users of the site whereas a proposed employment allocation is less likely to result in recreational visits compared to residential development. Any negative impacts on Hatfield Forest will need to be mitigated.
NDLP218	Mr Richard Gilyead				Transport connectivity to Saffron Walden	The transport connectivity to the strategic road network and rail services at Saffron Walden is limited which will limit attractiveness to industrial employers.	The Employment Needs Assessment Update identifies a need of up to 5ha for industrial development at Saffron Walden. A significant number of existing industrial estates are located within Saffron Walden and the Employment Land Review will identify those that warrant protection as Existing Employment Sites under Core Policy 45. It is noted that some sites have been redeveloped for alternative uses since the 2005 plan was adopted however it is considered that in line with the evidence base there is demand for industrial development in Saffron Walden and allocations should be made to meet future need.
NDLP1707	Rosper Estates Ltd				Treated office development differently to Industrial and logistics	The site selection process for office development is different to that of industrial and logistics. The industrial and logistics sites north of the A120 in the CPZ plus an extension to Stansted Courtyard were rejected whereas the Gaunts End/Elsenham Business Park site has been allocated.	The Employment Needs Assessment Update identifies a smaller-scale office need in the wider Stansted area of 3-5ha, noting that current market signals are weak. The Stansted Courtyard site (Takeley 012 EMP) was promoted for an unspecified employment use of 1ha whereas the Gaunts End allocation (Elsenham 003 MIX) is a larger office promotion capable of meeting the need in full. The Employment Land Review will look at existing employment sites and the potential for small-scale expansions as non-strategic allocations.

Table 11: Retail Capacity Study

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP402	Louise Johnson	Parish Clerk Elsenham Parish Council			Comment on retail provision at Elsenham.	At the entry to Elsenham, very limited parking makes accessibility by car challenging, and results in unwanted parking on local streets. The Tesco Express store is not large enough to accommodate additional demand. Elsenham compares badly by way of retail provision with other settlements of similar size. Elsenham is more than one kilometre from Stansted Mountfitchet.	Comment noted. Consideration will be given to providing improved access and parking for the existing retail offer at Elsenham, although it should also be considered that the retail provision is within walking and cycling of many parts of Elsenham which helps to make it more sustainable. Anyone completing a weekly shop is more likely to travel to a larger supermarket outside of Elsenham.

Table 12: Climate Change Evidence

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
No Comments Submitted							

Table 13: Habitat Regulation Assessment

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP1510	Natural England				Natural England HRA Comments	Natural England agrees with the conclusion of the HRA that there will be no adverse effects on integrity with respect to recreation impacts on the Essex Estuaries Special Area of Conservation (SAC) and the Blackwater Estuary (Mid Essex Coast Phase 4) Special Protection Area (SPA)/Ramsar at this stage in the plan-making process. Prior to the next iteration of the Local Plan HRA (at Regulation 19), further checks will be necessary with Anglian Water and further evidence gathering will be required in order to clarify the relevant water treatment works for the growth proposed, the available headroom / capacity at those works and any water quality risks to the Essex Coast sites. Natural England agrees with the HRA conclusion and we look forward to being consulted again on this matter at Regulation 19. We advise on the following minor changes to the first few paragraphs of Core Policy 38.	Noted and support welcome. The Council looks forward to continuing to work closely with Natural England to inform the Reg 19 Plan.
NDLP2076	Ms Debbie Bryce				Uk Priority Habitat	The evidence misses UK priority Habitat and should be included in the evidence base	The HRA addresses specific requirements as set out in legislation and associated guidance, however, the Plan is also supported by a Green Infrastructure Strategy and contains policies that seek to support a 20% net gain in biodiversity.

Table 14: Air Quality Management Area Assessment

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP728	Lewis Elmes				Air Quality - AQMA	The Air Quality values below appropriate guidance levels based on 2021 are skewed by the effects of Covid 19 lockdowns. With the exclusion of earlier years in the assessment, a reassessment of the AQMA needs to be reconsidered.	The Uttlesford District Council 2023 Air Quality Annual Status Report (ASR) (May 2023) concurs with the Air Quality Report that no air quality exceedances were identified in 2022 and no exceedances were identified in the past 6 years. The conclusions of the Air Quality Report are still valid

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
							and it is unnecessary to undertake a reassessment of the AQMA based on the 2023 Air Quality Annual Report.

Table 15: Water Cycle Study

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP2900	Martyn Everett				Buffer Zone	Comment requesting a higher buffer zone of 25 metres either sides of streams in built up areas, woodlands and dew ponds	We are revisiting the evidence on chalk streams to take into account updated requirements for biodiversity net gain and the extent of the natural flood plain. If this work identifies that the 15m buffer zone is no longer appropriate, we will consider whether changes are required to the Water Cycle Study and Core Policy 35 of the draft Local Plan.
NDLP1475	Environment Agency				Environment Agency Recommendations	Environment agency highlight the outcomes from the stage 1 addendums but note that Uttlesford should be completing stage 2 of the WCS to ensure a sound plan. The council should also ensure that development isn't delayed and that there is sufficient wastewater capacity is available by collaborating with Affinity water to address water supply limitations based on the updated WRMP (2024). They also state that stricter water efficiency measures are in place in chalk stream catchment areas. They highlight that the plan should also address agricultural practices contributing to water pollution and ensure that the plan mitigates stormwater drainage impacts and they should consider upgrading the network where necessary. as per The National Planning Practice Guidance and Building Regulations Approved Document H.	The response is noted. The Stage 1 Water Cycle Study is being updated and will be published alongside the pre-submission Local Plan. A Stage 2 study is also underway. Both studies will be informed by renewed engagement with statutory consultees including the Environment Agency, natural England and the water companies, and will take into account the most recent Water Resource Management Plans. Cumulative growth, including cross-border issues, will be considered as part of the evidence base work. We note the support for the higher efficiency targets and further evidence to support this ambition will be published at Regulation 19. Alongside the efficiency standards, we are reviewing the evidence supporting Core Policy 35 which relates to chalk streams and the provision of buffers to reduce run-off into watercourses.
NDLP4049	Saffron Walden Town Council				Localised Overcapacity Evidence	A number of comments referring to neighbourhood plan, planning application and previous local plan evidence stating that there isn't capacity for further growth in Clavering, Thaxted, Newport and Saffron Walden. They point to a water cycle study completed in 2010 by Hyder Consulting that stated the existing waste water works could not accommodate growth in Thaxted and Newport. They question the data presented in the stage 1 addendum WCS published alongside the regulation 18 plan, highlighting inconsistencies.	The Water Cycle Study was informed by recent engagement with the water companies, Natural England and the Environment Agency. This included testing the proposed level of growth to determine whether there were likely to be supply or wastewater treatment capacity issues. Further testing of the proposed growth will be carried out as part of a Stage 2 Water Cycle Study, to be published alongside the pre-submission (Regulation 19) Local Plan. If supply/capacity issues or potential for increases in pollutants are identified as part of this ongoing work, this will be taken into account in the Local Plan, but it should be noted that there is a statutory duty for wastewater undertakers to ensure there is sufficient capacity to accommodate planned development. . The information gathered for the Water Cycle Study supersedes that provided during

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
							the preparation of the 2012 Water Cycle study, which is now considerably out of date.
NDLP3699	Newport Parish Council	Newport Parish Council			Localised Overcapacity Evidence	A number of comments referring to neighbourhood plan, planning application and previous local plan evidence stating that there isn't capacity for further growth in Clavering, Thaxted, Newport and Saffron Walden. They point to a water cycle study completed in 2010 by Hyder Consulting that stated the existing waste water works could not accommodate growth in Thaxted and Newport. They question the data presented in the stage 1 addendum WCS published alongside the regulation 18 plan, highlighting inconsistencies.	The Water Cycle Study was informed by recent engagement with the water companies, Natural England and the Environment Agency. This included testing the proposed level of growth to determine whether there were likely to be supply or wastewater treatment capacity issues. Further testing of the proposed growth will be carried out as part of a Stage 2 Water Cycle Study, to be published alongside the pre-submission (Regulation 19) Local Plan. If supply/capacity issues or potential for increases in pollutants are identified as part of this ongoing work, this will be taken into account in the Local Plan, but it should be noted that there is a statutory duty for wastewater undertakers to ensure there is sufficient capacity to accommodate planned development. . The information gathered for the Water Cycle Study supersedes that provided during the preparation of the 2012 Water Cycle study, which is now considerably out of date.
NDLP3700	Newport Parish Council	Newport Parish Council					
NDLP3641	Newport Parish Council	Newport Parish Council					
NDLP679	Mr Neil Hargreaves						
NDLP784	Richard Pavitt						
NDLP2819	Stephen and Heather Ayles						
NDLP716	Mr Neil Hargreaves						
NDLP2059	Mrs Jacqueline Cooper						
NDLP2882	D MacPherson						
NDLP2883	D MacPherson						
NDLP1515	Natural England				Natural England Recommendations	Broad support for the plan from Natural England, noting that they are willing to help provide evidence for the higher water efficiency standard of 90 litres per person. They also note Affinity Waters water savings market scheme, BREEAM outstanding and the review for water neutrality in stage 2 study. They also recommend that the issue of small diameter pipes raised by Thames Water be investigated.	We welcome the broad support for the findings of the Water Cycle Study and the recommendations for higher efficiency targets. We will engage further with Natural England as part of the ongoing work to update the Stage 1 study and prepare the Stage 2 Water Cycle Study and would welcome contributions and advice as we develop further evidence to support the policies in the Local Plan.

Table 16: Strategic Flood Risk Assessment

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP3184	Phoenix Life Limited and Mulberry S				Employment sites flood risk	Comment highlighting that the flood risk associated with the employment growth in the plan particularly citing the are north and south of Takeley Street resulting in a 3% chance of flooding in a 30 year period .	The Level 1 SFRA is being updated and will be published alongside the pre-submission (Regulation 19) Local Plan to take into account the most recent modelling and flood risk data. The site allocations will also be assessed in further detail in a Level 2 SFRA that considers flooding from a range of sources and which will be published alongside the pre-submission Local Plan.
NDLP1477	Environment Agency				Environment Agency - Technical Evidence	Detailed evidence from the environment agency to inform the Level 2 SFRA, they highlight updating flood risk models and incorporating recent changes in developments, they request prioritising development in areas of lower flood risk and they request that detailed flood risk assessments take place for all potential development sites in the stage 2 SFRA by consulting with the Environment Agency early in the process.	An updated Level 1 SFRA will be prepared an published alongside the pre-submission (Regulation 19) Local Plan which takes into account updated modelling and flood risk data as well as the updated NPPF and Planning Practice Guidance. In conjunction with the Level 1 SFRA updates, a Level 2 SFRA will be produced to assess those sites identified as being at fluvial flood risk or significant risk of surface water flooding. This will include consideration of other sources of flooding. The Environment Agency will be consulted as part of this ongoing work.
NDLP1172	Louise Howles				Lack of assessment for cumulative impact	Water cycle study doesn't take into account of the cumulative flood risk to other areas	Cumulative flood risk is assessed in the Level 1 SFRA (November 2021) rather than in the October 2023 addendum which was published alongside the draft local Plan. An updated Level 1 SFRA which takes into account the most recent flood risk data will be published alongside the pre-submission (Regulation 19) Local Plan.
NDLP3701	Newport Parish Council	Newport Parish Council					

Table 17: Transport Evidence Topic Paper

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP2539	D J Bagnall				A120 Corridor	A number of respondents have stated that the evidence for A120, B1256 and settlements along the routes is reviewed to ensure it is accurate and up-to-date. Comments were made concerning the evidence regarding the impact of traffic on the village.	The Council is content that transport evidence base is appropriate and robust for the wider A120 corridor. The DfT have confirmed that the use of the 2021 survey data is acceptable. The transport evidence is under constant review and the Council will ensure that it has the most appropriate evidence available at Reg.19 and examination. The revised transport
NDLP2542	D J Bagnall						
NDLP3024	Jean Johnson						
NDLP3526	Takeley Neighbourhood Plan Steering Group						

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
							evidence will inform any revised Reg.19 policies which provides the direction in relation to what is required from the strategic allocations in relation to highway interventions, active travel and sustainable transport measures. There are also other policies in the Local Plan which require further consideration of the impact of development on the highway network, the provision of active travel routes and the delivery of other transport measures. Development proposals will deliver proportionate off-site improvements to the highway network.
NDLP3888	Lands Improvement Holdings					The comment suggests that the Transport Evidence needs to consider and assess a number of spatial options in order to determine the most appropriate spatial option approach.	"The Transport Evidence Topic Paper is a summary of the evidence that has informed the spatial option that is included within the Reg.18 Draft Local Plan. Alternative spatial options have been assessed and the results of these assessments will be detailed in other documents. The Council is content that transport evidence considers many of the transport issues affecting Uttlesford including the capacity of the highway network. The transport evidence is under constant review and the Council will ensure that it has the most appropriate evidence available at Reg.19 and examination.
NDLP3547	Ashdon Neighbourhood Plan Steering					The comment suggests that Ashdon's categorisation as a larger village means that there is a contradiction with the Local Transport Plan themes.	Comment has been noted. Ashdon is now identified as a Smaller Village and there are no allocations identified for this village.
NDLP3884	Grosvenor Property UK				Capacity of the Network	The comment relates to making sure the spatial strategy reflects the capacity of the highway network.	The Council is content that transport evidence considers many of the transport issues affecting Uttlesford including the capacity of the highway network. The transport evidence is under constant review and the Council will ensure that it has the most appropriate evidence available at Reg.19 and examination. However, it will be reviewed to ensure it reflects the most up-to-date guidance available at the time of production. The transport evidence has informed the spatial strategy and the evidence has assessed the impact of the growth proposals on the transport network.
NDLP2342	Richard Haynes				Coverage of the evidence	It was stated that the evidence is deficient in certain aspects and the Transport Evidence needs to be more comprehensive.	The Council is content that transport evidence considers many of the transport issues affecting Uttlesford. The transport evidence is

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP2553	Geoff Bagnall						under constant review and the Council will ensure that it has the most appropriate evidence available at Reg.19 and examination. However, it will be reviewed to ensure it reflects the most up-to-date guidance available at the time of production.
NDLP223	Mr Richard Gilyead				E-Bike Scheme	The respondent has questioned whether providing an e-bike to each resident may not be workable and suggests a hire type scheme instead.	The Council is reviewing this mitigation and will be proposing a sustainable transport approach that can be applied to the strategic allocation. This approach will be supported in the Transport Evidence.
NDLP1822	Essex County Council				ECC	Essex County Council as Highway Authority have asked for further detail on the transport evidence and asked a number of detailed technical questions regarding transport modelling. ECC want to continue the productive working relationship working towards Reg.19	The Council is content that transport evidence base is appropriate and robust and that it does take into account the latest information. However, it will be reviewed to ensure it reflects the most up-to-date guidance available at the time of production.
NDLP1170	Michael Marriage				Flitch Way	The comment states that the Flitch Way evidence does not recognise the condition, on the ground, of the route and that it is unsuitable to be upgraded to an active travel route.	The revised transport evidence will inform any revised Reg.19 policies which provides the direction in relation to what is required from the strategic allocations in relation to highway interventions, active travel and sustainable transport measures. There are also other policies in the Local Plan which require further consideration of the impact of development on the highway network, the provision of active travel routes and the delivery of other transport measures. Development proposals will deliver proportionate off-site improvements to the highway network.
NDLP225	Mr Richard Gilyead				Mode shift targets	A comment was made concerning the mode shift targets that have been used in the transport modelling evidence and that they may be overly ambitious.	The Council is content that transport evidence base is acceptable and that it does take into account the latest information regarding potential mode shift from new developments. However, it will be reviewed to ensure it reflects the most up-to-date guidance available at the time of production.
NDLP727 NDLP3702	Mr Neil Hargreaves Newport Parish Council	Newport Parish Council			Newport	One respondent has asked that the evidence for Newport is reviewed to ensure it is accurate and up-to-date. Comments were made concerning the evidence regarding the impact of traffic on the village.	The Council is content that transport evidence base is appropriate and robust for transport conditions affecting junctions in Newport. The DfT have confirmed that the use of the 2021 survey data is acceptable. The transport evidence is under constant review and the Council will ensure that it has the most appropriate evidence available at Reg.19 and examination. The revised transport evidence will inform any revised Reg.19 policies which provides the

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
							direction in relation to what is required from the strategic allocations in relation to highway interventions, active travel and sustainable transport measures. There are also other policies in the Local Plan which require further consideration of the impact of development on the highway network, the provision of active travel routes and the delivery of other transport measures. Development proposals will deliver proportionate off-site improvements to the highway network.
					Rural Network	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.	The Council is content that transport evidence considers the rural nature of Uttlesford. The transport evidence is under constant review and the Council will ensure that it has the most appropriate evidence available at Reg.19 and examination. 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.
					Saffron Walden	One respondent has asked that the evidence for Thaxted is reviewed to ensure it is accurate and up-to-date. Comments were made concerning the evidence regarding the impact of traffic on the village.	The Council is content that transport evidence base is appropriate and robust for transport conditions effecting junctions in Thaxted. The DfT have confirmed that the use of the 2021 survey data is acceptable. The transport evidence is under constant review and the Council will ensure that it has the most appropriate evidence available at Reg.19 and examination. The revised transport evidence will inform any revised Reg.19 policies which provides the direction in relation to what is required from the strategic allocations in relation to highway interventions, active travel and sustainable transport measures. There are

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
							also other policies in the Local Plan which require further consideration of the impact of development on the highway network, the provision of active travel routes and the delivery of other transport measures. Development proposals will deliver proportionate off-site improvements to the highway network.
					Saffron Walden Link Road	A comment was made supporting the link road, however, the respondent suggested that it should connect all around to Newport Road to have maximum benefits.	The Council is content that transport evidence base is appropriate and robust for Saffron Walden. The Council is satisfied that proposed link road through the proposed allocation between Radwinter Road and Thaxted Road will serve as a local distributor road and that the supporting transport evidence provides sufficient justification. The link road will provide a multi-modal route around the east of Saffron Walden that will provide an alternative route for all vehicles and will be designed as the main street serving the development. The transport evidence demonstrates that the link road does distribute traffic away from the Radwinter/Thaxted Rd junction and does outperforms the proposed link to the west in distributing traffic and being suitable for all traffic including buses and HGV's. The delivery of a new road to link with the M11 and a new junction onto the M11 is not deliverable as part of the local proposals and would require significant funding which would have to come direct from central government. The future delivery of a link road will be safeguarded from Thaxted Road around the south of the town to Newport Road. This safeguarded route will be reflected in the revised policy.
NDLP402	Louise Johnson	Parish Clerk Elsenham Parish Council			Stansted Mountfitchet	A number of respondents have stated that the evidence for Stansted Mountfitchet is reviewed to ensure it is accurate and up-to-date. Comments were made concerning the evidence regarding the impact of traffic on the village.	The Council is content that transport evidence base is appropriate and robust for transport conditions in Stansted Mountfitchet and the wider A120 corridor. The DfT have confirmed that the use of the 2021 survey data is acceptable. The transport evidence is under constant review and the Council will ensure that it has the most appropriate evidence available at Reg.19 and examination.
NDLP1802	Stansted MF Parish Council						
NDLP3336	Mr Raymond Woodcock						

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP1713	Thaxted Parish Council	Thaxted Parish Council			Thaxted	One respondent has asked that the evidence for Thaxted is reviewed to ensure it is accurate and up-to-date. Comments were made concerning the evidence regarding the impact of traffic on the village.	The Council is content that transport evidence base is appropriate and robust for transport conditions effecting junctions in Thaxted. The DfT have confirmed that the use of the 2021 survey data is acceptable. The transport evidence is under constant review and the Council will ensure that it has the most appropriate evidence available at Reg.19 and examination. The revised transport evidence will inform any revised Reg.19 policies which provides the direction in relation to what is required from the strategic allocations in relation to highway interventions, active travel and sustainable transport measures. There are also other policies in the Local Plan which require further consideration of the impact of development on the highway network, the provision of active travel routes and the delivery of other transport measures. Development proposals will deliver proportionate off-site improvements to the highway network.
NDLP3883	Grosvenor Property UK				Transport Assessment	A comment was made regarding the Council's Transport Assessment.	The Council is content that transport evidence considers many of the transport issues affecting Uttlesford including the sustainable travel. The transport evidence is under constant review and the Council will ensure that it has the most appropriate evidence available at Reg.19 and examination. However, it will be reviewed to ensure it reflects the most up-to-date guidance available at the time or production. The transport evidence has informed the spatial strategy and the evidence has assessed the impact of the growth proposals on the transport network and what sustainable transport measures will be proposed in the plan policies.

Table 18: Transport Baseline Assessment

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
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NDLP577	Mark Coletta				A120 Corridor	It was suggested that the evidence for transport in the A120 corridor was inaccurate and a misrepresentation of the actual conditions.	<p>The Council is content that transport evidence base is appropriate and robust for transport conditions in the A120 corridor. The DfT have confirmed that the use of the 2021 survey data is acceptable. The transport evidence is under constant review and the Council will ensure that it has the most appropriate evidence available at Reg.19 and examination.</p> <p>The revised transport evidence will inform any revised Reg.19 policies which provides the direction in relation to what is required from the strategic allocations in relation to highway interventions, active travel and sustainable transport measures. There are also other policies in the Local Plan which require further consideration of the impact of development on the highway network, the provision of active travel routes and the delivery of other transport measures. Development proposals will deliver proportionate off-site improvements to the highway network.</p>
NDLP211 NDLP214	Mr Richard Gilyead Mr Richard Gilyead				Data Presentation	Comments asked that the presentation of data is consistent across the evidence documents and easy to understand	<p>The evidence will be presented in a consistent and understandable format.</p> <p>The revised transport evidence will inform any revised Reg.19 policies which provides the direction in relation to what is required from the strategic allocations in relation to highway interventions, active travel and sustainable transport measures. There are also other policies in the Local Plan which require further consideration of the impact of development on the highway network, the provision of active travel routes and the delivery of other transport measures. Development proposals will deliver proportionate off-site improvements to the highway network.</p>
NDLP1825	Essex County Council				Essex CC	Essex County Council as Highway Authority have asked for further detail on the transport evidence and asked a number of detailed technical questions regarding transport modelling. ECC want to continue the productive working relationship working towards Reg.19	<p>The Council is content that transport evidence base is appropriate and robust and that it does take into account the latest information. However, it will be reviewed to ensure it reflects the most up-to-date guidance available at the time of production.</p> <p>Many of the issues raised concerning the transport evidence and transport modelling will be resolved in due course. The Council will continue to work with Essex County Council on the emerging evidence base and the next stages of Local Plan policy development.</p>
NDLP984	Louise Howles				General	A number of respondents have raised the issue of the data collection in 2021. Concerns were raised	The Council is content that transport evidence base is appropriate and robust for transport conditions

NDLP1806	Stansted MF Parish Council					regarding the evidence in the A120 corridor and whether the sustainable transport mitigations are reasonable and deliverable.	in the A120 corridor. The DfT have confirmed that the use of the 2021 survey data is acceptable. The transport evidence is under review and the Council will ensure that it has the most appropriate evidence available at Reg.19 and examination. The revised transport evidence will inform any revised Reg.19 policies which provides the direction in relation to what is required from the strategic allocations in relation to highway interventions, active travel and sustainable transport measures. There are also other policies in the Local Plan which require further consideration of the impact of development on the highway network, the provision of active travel routes and the delivery of other transport measures. Development proposals will deliver proportionate off-site improvements to the highway network.
NDLP3490	Allison Evans						
NDLP2381	National Highways				National Highways	National Highways as highway authority for the Strategic Road Network have asked for further detail on the transport evidence and asked a number of detailed technical questions regarding transport modelling. NH want to continue the productive working relationship working towards Reg.19	The Council is content that transport evidence base is appropriate and robust and that it does take into account the latest information. However, it will be reviewed to ensure it reflects the most up-to-date guidance available at the time of production. Many of the issues raised concerning the transport evidence and transport modelling will be resolved in due course. The Council will continue to work with National Highways on the emerging evidence base and the next stages of Local Plan policy development.
NDLP2382	National Highways						
NDLP2383	National Highways						
NDLP2384	National Highways						
NDLP2385	National Highways						
NDLP2386	National Highways						
NDLP2387	National Highways						
NDLP2388	National Highways						
NDLP2389	National Highways						
NDLP2390	National Highways						
NDLP2397							

NDLP2397							
NDLP3703	Newport Parish Council	Newport Parish Council			Newport	One respondent has asked that the evidence for Newport is reviewed to ensure it is accurate and up-to-date. Comments were made concerning the evidence regarding the impact of traffic on the village.	<p>The Council is content that transport evidence base is appropriate and robust for transport conditions in Newport.</p> <p>The DfT have confirmed that the use of the 2021 survey data is acceptable. The transport evidence is under review and the Council will ensure that it has the most appropriate evidence available at Reg.19 and examination.</p> <p>The revised transport evidence will inform any revised Reg.19 policies which provides the direction in relation to what is required from the strategic allocations in relation to highway interventions, active travel and sustainable transport measures. There are also other policies in the Local Plan which require further consideration of the impact of development on the highway network, the provision of active travel routes and the delivery of other transport measures. Development proposals will deliver proportionate off-site improvements to the highway network.</p>
NDLP402	Louise Johnson	Parish Clerk Elsenham Parish Council			Stansted Mountfitchet	One respondent has asked that the evidence for Stansted Mountfitchet is reviewed to ensure it is accurate and up-to-date. Comments were made concerning the evidence regarding the impact of traffic on the village.	<p>The Council is content that transport evidence base is appropriate and robust for transport conditions in Stansted Mountfitchet.</p> <p>The DfT have confirmed that the use of the 2021 survey data is acceptable. The transport evidence is under review and the Council will ensure that it has the most appropriate evidence available at Reg.19 and examination.</p> <p>The revised transport evidence will inform any revised Reg.19 policies which provides the direction in relation to what is required from the strategic allocations in relation to highway interventions, active travel and sustainable transport measures. There are also other policies in the Local Plan which require further consideration of the impact of development on the highway network, the provision of active travel routes and the delivery of other transport measures. Development proposals will deliver proportionate off-site improvements to the highway network.</p>
NDLP413	Alan Carter				Traffic Surveys	It was suggested that the use of 2021 survey data in the transport modelling is not appropriate as it is too close to the Covid restrictions period when traffic was still recovering.	<p>The Council is content that transport evidence base is appropriate and robust. The DfT have confirmed that the use of the 2021 survey data is acceptable. The transport evidence is under constant review and the Council will ensure that it has the most</p>

							<p>appropriate evidence available at Reg.19 and examination.</p> <p>The revised transport evidence will inform any revised Reg.19 policies which provides the direction in relation to what is required from the strategic allocations in relation to highway interventions, active travel and sustainable transport measures. There are also other policies in the Local Plan which require further consideration of the impact of development on the highway network, the provision of active travel routes and the delivery of other transport measures. Development proposals will deliver proportionate off-site improvements to the highway network.</p>
NDLP213	Mr Richard Gilyead				Use of existing guidance	Comments were made which asked that the council considers all of the available evidence and guidance documents available.	The Council is content that transport evidence base is appropriate and robust and that it does take into account the latest information. However, it will be reviewed to ensure it reflects the most up-to-date guidance available at the time of production.

Table 19: Village Facilities Study

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP2133	Jane Gray				Corrections	It is suggested that the Villages Facilities Study contains a number of factual errors and should not have been used to inform the Local Plan.	The village facilities study has been amended following the Reg 18 to make any factual corrections, but also to make an adjustment to ensure the scoring is by settlement, not by parish. This helps to avoid some areas being skewed into the Larger Village category where facilities are provided across smaller villages.
NDLP2225	Clerk Hatfield Broad Oak Parish Council	Hatfield Broad Oak Parish Council			Methodology	Seeks clarification of the Methodology including scoring and cut-offs for the tiers. Queries the allocated distribution of development as a consequence e.g. Great Chesterford. In addition there was a complaint that the topic paper had confusingly two different names such that the Parish Council overlooked the opportunity to comment: "Settlement Services and Facilities Topic Paper" and "Village Facilities Study". Notes that Googlemaps were used to identify facilities etc but that this is not always the most accurate and suggests that visiting the settlements would be preferable. General comments on methodology and detailed assessment of services and facilities indicating where corrections are required	The Village Hierarchy evidence paper sets out how the facilities were scored in a similar manner to the previous 2019 Local Plan and other local plans, with a higher weighting attributed to a facility normally associated with a higher order and/or more sustainable settlement such as a secondary school or railway station. The quality of the facility itself was not considered except for certain services such as buses and broadband (because of the relatively subjective nature and potential to improve a local facility especially associated with population growth). The settlement scorings were then compared with the population figures for each parish to determine the hierarchy tiers. The allocation of strategic development sites was also dependent on sites coming forward and their being assessed as suitable for development; the sites at Great Chesterford were not in the end considered

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
							deliverable for the Local Plan. . The settlement hierarchy and facilities work overall has been checked in the light of more recent information from survey and from parish councils and the settlement hierarchy reviewed as necessary in the next Regulation19 stage of the Local Plan. Naming of evidence papers will be reviewed and made consistent and clear for the next stage of the Plan.
NDLP957	Great Easton and Tilty Parish Council	Clerk/Responsible Financial Officer Great Easton and Tilty Parish Council	Kate Rixson		Methodology	Seeks clarification of the Methodology including scoring and cut-offs for the tiers. Queries the allocated distribution of development as a consequence e.g. Great Chesterford. In addition there was a complaint that the topic paper had confusingly two different names such that the Parish Council overlooked the opportunity to comment: "Settlement Services and Facilities Topic Paper" and "Village Facilities Study". Notes that Googlemaps were used to identify facilities etc but that this is not always the most accurate and suggests that visiting the settlements would be preferable. General comments on methodology and detailed assessment of services and facilities indicating where corrections are required	The Village Hierarchy evidence paper sets out how the facilities were scored in a similar manner to the previous 2019 Local Plan and other local plans, with a higher weighting attributed to a facility normally associated with a higher order and/or more sustainable settlement such as a secondary school or railway station. The quality of the facility itself was not considered except for certain services such as buses and broadband (because of the relatively subjective nature and potential to improve a local facility especially associated with population growth). The settlement scorings were then compared with the population figures for each parish to determine the hierarchy tiersThe allocation of strategic development sites was also dependent on sites coming forward and their being assessed as suitable for development; the sites at Great Chesterford were not in the end considered deliverable for the Local Plan. The settlement hierarchy and facilities work overall has been checked in the light of more recent information and the settlement hierarchy reviewed as necessary in the next Regulation19 stage of the Local Plan. Naming of evidence papers will be reviewed and made consistent and clear for the next stage of the Plan.
NDLP987	Great Easton and Tilty Parish Council	Clerk/Responsible Financial Officer Great Easton and Tilty Parish Council	Kate Rixson				
NDLP2292	Stuart Hastie						
NDLP2413							
NDLP1106	Jane Gray						
NDLP1099							
NDLP948	Theresa Trotzer Wilson						
	James Balaam	G W Balaam & Son					
	Sarah Brewin		Matthew Thomas				

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP501	Nigel Tedder	Managing Director New Homes Project Managements Limited	Nigel Tedder		Service provision	Given the level of growth in some settlements there should be a requirement in the plan to improve the level of facilities accordingly	The growth expended over the past few years has been unplanned without the benefit of a reasoned approach to new development that takes into account the supporting infrastructure. The consents granted have not been able to require associated infrastructure in the absence of an up-to-date local plan. The concept master plans proposed for the strategic sites in this plan include the requirement to provide the necessary community, highway, transport and utility infrastructure. It is also the case that directing development to the largest and most sustainable settlements helps to strengthen the viability of services and facilities in those places (as there are more people to use them) and that any new services or facilities provided, benefit the existing community as well as the new ones.
NDLP3778	Manor Oak Homes				Settlement hierarchy - Hatfield Heath	Settlements were assessed in the District in terms of education, health, community facilities, commercial development, open space and transport and connectivity, resulting in an overall service score for each settlement. Hatfield Heath, as a Local Rural Centre, has a higher service score (93) than Newport (86) and Elsenham (83) despite both settlements having a larger population. Queries why there was no allocation for Hatfield Heath, categorised in the second tier as a Local Rural Centre which would assist in its sustainability to support local services	Hatfield Heath is located within the Metropolitan Green Belt and Exceptional Circumstances need to be set out to justify any development within the GB. The Council does not consider there are any Exceptional Circumstances to justify development at Hatfield Heath in the GB as there are numerous locations for development available outside the GB.
NDLP2506	Michael Cox				Settlement hierarchy - Littlebury	Welcomes designation of Littlebury but queries definition of the settlement being suitable for 'limited infill' only. Questions the overall scoring for Littlebury and that some of the facilities identified by the Council are not in fact present in the village. Feels Littlebury should be at the lower end of the 'Small Village' category or even in 'open countryside'. Swards End and Wenden's Ambo need reviewing.	The settlement hierarchy and facilities work will be checked in the light of more recent information and the settlement hierarchy reviewed as necessary in the next stage of the Local Plan. CP3 sets out detailed criteria to define 'limited infill' and it is considered that this is sufficiently clear.
NDLP2506	Michael Cox						
NDLP2094	Jane Dukes						
NDLP1771	Janice Heales						
NDLP2102	Lindsey and Tim Coyne						
NDLP1915	Louise Johnson						
NDLP2108	Amanda Barclay & Iain Black						

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP1922	Sally Kennedy						
NDLP1927	Carmel Carline local h						
NDLP2130	Malcolm Domb						
NDLP2156	Lucinda Whife						
NDLP2048	Mr Robert Osborne						
NDLP2161	Thomas and Isabelle Page						
NDLP2108	Amanda Barclay & Iain Black						
	Malcolm Domb						
NDLP2130	Lucinda Whife						
NDLP2156	Thomas and Isabelle Page						
NDLP2161	Robin Grayson						
NDLP2191	Mrs Isobel Grayson						
NDLP2198	Claudia Haisman-Green and Mike Green						

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP2207	Michael Hancock						
	Jennifer Parkinson						
NDLP2403	Rosemary Wild						
	Andrew Figge						
NDLP2409	Tom Hallmark						
NDLP2471	Linda Kelsey						
NDLP2478	Mr and Mrs John and Gillian Broomfield						
NDLP2520							
NDLP2524	Mrs Isobel Grayson						
NDLP2669	Nick Dukes						
	Mr and Mrs John and Gillian Broomfield						
NDLP2762							
NDLP2799	Mr Brian Johnson						
NDLP2941	Tim and Alexandra Bradshaw						
NDLP3033	Nikhil Saraswat						

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP4125	Katie Ransom						
	Katie Ransom						
NDLP1632	Mr and Mrs Roberts						
NDLP1504							
NDLP1504							
NDLP2832							
NDLP2291	Stuart Hastie				Settlement hierarchy - Ashdon	Considered that the work associated with assessing the hierarchy of settlements was not as accurate as it should have been for Ashdon and would benefit from input from more competent local knowledge and recognition of the village and smaller settlement boundaries.	Noted. The Settlement Facilities Work informing the Reg 18 Plan considered facilities at a Parish level rather than a Settlement level which needs updating to inform the Reg 19 Plan. This has led to some changes being proposed, including for Ashdon to be re-classified as a smaller village.
NDLP3534	Ashdon Neighbourhood Plan Steering						
NDLP2400	Jane Gray						
NDLP4162	G W Balaam & Son				Settlement hierarchy - Clavering	Supports the overall process of assessing the level of suitability and service provision across settlements. However there are a number of services and facilities in Clavering that have not been recognised as part of the assessment such as the provisioo of three types of indoor sports facility; with regard to public transport there is access to the Essex Demand Responsive Transport (DaRT) service and the 306 and 446 registered bus services. Correction of the range of facilities would underline the sustainability of Clavering and the potential to allocate further development here.	The Settlement Facilities Work informing the Reg 18 Plan considered facilities at a Parish level rather than a Settlement level. The Council is satisfied that Clavering falls within the Larger Village category. The methodology for identifying housing figures is set out separately and considered in relation to Core Policy 19.
NDLP1130	James Balaam						
NDLP695	Nigel Wood						
NDLP877	Juergen Kissinger						
NDLP1291	Mr Jeremy Veitch						
	Mr and Mrs Hockley						

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP2112							
NDLP2857 NDLP2905	Jeanette O'Brien Debden Parish Council				Settlement hierarchy - Debden	Debden including Debden Green has already seen a large number of "windfall" planning permissions granted in the recent past, and hence the allocated expansion of Debden should be limited to the 25 houses for which outline planning permission has been granted. Assertion that another 92 dwellings over the next 18 years will be sustainable, bearing in mind the loss of agricultural land in the vicinity to 60 hectares for solar panels; water levels are limited; the Debden Primary School is currently full with temporary classrooms and secondary school children have to travel to Newport or Saffron Walden. There is no doctor's surgery in the village and only small post office, poor walking environments and infrequent bus routes and only two 'main' roads.	The scoring for the settlement hierarchy afforded Debden a large village status considered against the scoring of other parishes. However it should be noted that Debden is not allocated a figure of 92 dwellings to plan for, that is the total including all the development that has already come forward. the Residual to plan for figure is for 25 additional dwellings.
NDLP3396	Strategic Land V Limited & Ms Hawke				Settlement Hierarchy - Flitch Green	The two settlements of Flitch Green and Felsted are directly related to one another and are on the same bus route so the options of sustainable travel between the two settlements are numerous. It is therefore reasonable to share services and facilities due to the accessibility between the two. The well-connected relationship between the two settlements and the shared services and facilities provides a strong justification to support further growth for Flitch Green. Flitch Green has the highest population: Little Canfield (1,341); Barnston (926); and Little Bury (868) . Queries the thinking behind Ashdon as a Large Village which has a smaller population than Flitch Green (2,643) . More consistency needs to be applied to present a more accurate outcome.	The Settlement Facilities Work informing the Reg 18 Plan considered facilities at a Parish level rather than a Settlement level which needs updating to inform the Reg 19 Plan. However, the Council are content these are separate settlements - there is clear countryside between the two villages that have clear and separate identities, etc Evidence for Ashdon has been reassessed and it is no longer in the large village category. .
NDLP1044 NDLP958 NDLP442	Great Easton and Tilty Parish Council Great Easton and Tilty Parish Council Sally Irving	Clerk/Responsible Financial Officer Great Easton and Tilty Parish Council Clerk/Responsible Financial Officer Great Easton and Tilty Parish Council	Kate Rixson Kate Rixson		Settlement hierarchy - Great Easton	Comments that the classification of settlements does not reflect the generality on the ground with two settlements in the parish and the larger designated as open countryside which is inaccurate. Only one of the two settlements in Great Easton parish is considered in the hierarchy and even then the village is not considered to be sustainable being without many daily facilities available some distance away in Thaxted or Great Dunmow and with a subsidised bus service available only until 2025.	Comments from the Parish councils and other responders are noted. The Settlement Facilities Work informing the Reg 18 Plan considered facilities at a Parish level rather than a Settlement level but has been updated and may lead to some adjustments to the hierarchy to be included in the Reg 19 Plan.

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP770	John Stevens						
NDLP928	Great Easton and Tilty Parish Council	Clerk/Responsible Financial Officer Great Easton and Tilty Parish Council	Kate Rixson				
NDLP959	Great Easton and Tilty Parish Council	Clerk/Responsible Financial Officer Great Easton and Tilty Parish Council	Kate Rixson				
NDLP1116	Maggie Stevens						
NDLP1637	michael howarth						
NDLP1109	Theresa Trotzer Wilson				Settlement hierarchy - Hatfield Broad Oak	Contests the housing allocation figures for Hatfield Broad Oak and its scoring in the settlement hierarchy which places it just in the Large Village category but it has a e relatively low range of facilities locally with a dispersed population and hence the need to travel by car with a poor bus service that finishes at 9pm. The allocation does not reflect the rural nature of the parish with scattered homes and the main village of Hatfield Broad Oak having 71% population, and 60% homes, hence the dependence on the car. Parish Council requests that in any housing development one half is allocated for affordable housing and request that it identifies its own development sites.	The settlement scores have been reviewed and checked in the light of more recent evidence. Hatfield Broad Oak remains a large village status because of the relative range of facilities it has. Its housing allocation to accommodate small development sites over the Plan period is under review. Parish Councils are invited to come forward to identify sites for new housing as part of their Neighbourhood Plan and this would be welcomed for Hatfield Broad Oak. With regard to affordable housing the local plan policy generally seeks 35% allocation.
NDLP2914	Christine Chester						
NDLP1591	Maureen Geddes						
NDLP2566	Little Hallingbury Parish Council				Settlement Hierarchy - Little Hallingbury	Requests correction to Little Hallingbury's score because of the absence of a secondary school	Noted. The Settlement Facilities Work informing the Reg 18 Plan considered facilities at a Parish level rather than a Settlement level which needs updating

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							to inform the Reg 19 Plan. However, Little Hallingbury is not identified as a Larger Village and so is not identified any proposed allocations.
NDLP2812	Stephen and Heather Ayles				Settlement Hierarchy - Newport	The scoring of facilities at Newport has been overstated and does not reflect the quality of service e.g. trains.	Noted, although Newport is classified as a Local Rural Centre and scores much mor highly than villages falling into lower categories.
NDLP2575	Stebbing Parish Council				Settlement hierarchy - Stebbing	Parish Council queries the allocation to Stebbing in the context of the spatial strategy that seeks development in the more sustainable locations which are less car dependent and have facilities, unlike Stebbing. A high number of primary schoolchildren travel for a distance by car which contributes to local congestion. The Parish Council urges that specific projects which will promote cycle lanes, footpaths, car free and pedestrian zones and specific school bus runs, are developed to tackle climate change in a more meaningful way.	Although the range of facilities is not of the scale of the larger settlements such as Great Dunmow, the village does have facilities that can meet some daily needs and has a primary school. Hence its categorisation as a large Village. The NPPF requires Local Plans to identify housing requirement figures for Neighbourhood Plans that have passed the area designation stage, that 10 % of sites should be on sites of less than one hectare, and that development should be supported in rural settlements where development can support the viability and vitality of those communities. The large majority of growth is directed to the Key Settlements and Local Rural Centres, but some (a comparatively modest amount) is directed to the larger and most sustainable of the Larger Villages. This is an appropriate approach in accordance with national policy. It is also interesting to note that the level of growth proposed in the Larger Villages for the remainder of the Plan period (c. 18 years) is a substantial reduction in the level that has already come forward in just the last two years, in the absence of an up to date plan, or land supply.
NDLP2512	Widdington Parish Council				Settlement hierarchy - Widdington	Requests correction to Widdington's score because of the absence of a mobile library service. Notes traffic in the village arising from pit activity	Noted. The Settlement Facilities Work informing the Reg 18 Plan considered facilities at a Parish level rather than a Settlement level which needs updating to inform the Reg 19 Plan. Widdington is not classified as a Larger Village and so is not identified any allocations.
NDLP402	Louise Johnson	Parish Clerk Elsenham Parish Council			Settlement Hierarchy-El senham	Parish council wishes to correct the description of the village as linear when it has an east-west axis as well as the railway line and recent peripheral developments. The railway line does not connect to Stansted Airport. There are three hamlets: Tye Green, Gaunts End and Fullers End.	The description of the village form and related connections and hamlets will be amended in the settlement hierarchy paper but it will not impact on the categorisation of Elsenham.
NDLP1869	Mike Parnell				Settlement hierarchy -High Easter	Disputes the allocation of scores against the village facilities and requests a review because several of the facilities are not available either to the public or for only a limited time of the day or week. The settlement hierarchy score therefore exaggerates the range of services actually available and means that the village has been placed in a higher category than it should have been. Objects to designation of High Easter as a Large Village because it does not have a range of facilities nor a primary school, has an infrequent bus service and poor quality roads	The assessment of services and facilities across the parishes was undertaken using real information directly from the parishes themselves and published information from elsewhere. The access to primary school is an essential criterion for a settlement to be designated 'large village'. The settlement hierarchy and applied criteria are being reviewed for the Regulation 19 Plan and High Easter does not have Large Village status.
NDLP1982	Rebecca Foley						
NDLP2184	Amanda Deans						
NDLP846			Allison Ward				

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP762	Allison Ward	Parish Clerk High Easter Parish Council					
	Allison Ward	Parish Clerk High Easter Parish Council	Allison Ward				
NDLP869	Allison Ward	Parish Clerk High Easter Parish Council	Allison Ward				
NDLP823	Allison Ward	Parish Clerk High Easter Parish Council	Allison Ward				
NDLP1241	Mr Bill Critchley				Settlement hierarchy- Takeley	Notes and corrects oversights regarding facilities recorded for Takeley.	The assessment of services and facilities across the parishes was undertaken using real information directly from the parishes themselves where parishes responded to the Council's request for information, and from published information from elsewhere such as Google maps. Site visits across the District were also made to help gain a better understanding of the character and range of facilities available in each parish. However it is recognised that there are corrections and updates needed to complete this work on the settlement hierarchy. It will be reviewed for the Regulation 19 Plan
NDLP2774	Wimbish Parish Council				Settlement Hierarchy- Wimbish	The facilities and services identified for Wimbish (post office, public house convenience store, community transport, are not all accurate and hence the scoring should be adjusted accordingly.	The updated work following the Reg 18 consultation considering scoring by settlement rather than by parish has led Wimbish to drop out of the Larger Village category.
NDLP568	Mr Michael Young						
NDLP2176	Anne Bulling				Stansted Mountfitchet	Corrects factual errors about location of facilities in the town and the lack of connectivity within it.	Factual description of Stansted Mountfitchet will be amended in the Reg 19 draft of the Plan

Table 20: Leisure and Built Facilities Study

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP402	Louise Johnson	Parish Clerk Elsenham Parish Council			Parks and gardens	The respondent highlights that Station Road Memorial Garden, Elsenham is very small and should probably be noted as such. They consider it inappropriate to refer to the small site in the same report as The Common and Bridge End Gardens, both in Saffron Walden, which are much larger spaces.	The study does refer to the size of the site and reflects that the Station Road Memorial Garden is very small, stating 'Three of the sites; Bridge Street, Dorset House and Station Road Memorial Garden are particularly small at 0.08, 0.06 and 0.03 hectares respectively.' The purpose of the study is to record all assets in the district regardless of size. Each will perform a different function depending on location.
NDLP402	Louise Johnson	Parish Clerk Elsenham Parish Council			Open space	Elsenham Parish Council highlights that Franklin Drive play area, Elsenham is unknown to them; that Barley Way play area, Elsenham is usually known as Isabel Drive play area; and that the main children's play area in Elsenham, off Leigh Drive, is not mentioned.	Comments are noted and will be reviewed as part of the final documents for Reg 19.

Table 21: Open Space Report

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP1523	Natural England				Hatfield Forest	Natural England have suggested that given Hatfield Forest SSSI/NNR is suffering from recreational pressure and the National Trust charge for entry and parking at the site, it is recommended that the Open Space evidence base runs a scenario that excludes Hatfield Forest from the baseline assessment of accessible greenspace provision. Thus not skewing the data. Similarly, the Flitch Way is no wider than other Public Rights of Way (PRoW) in the district, therefore they consider the 15 minute walking 'buffer' that has been applied should be removed and redrawn only around pocket areas of extended space 1 hectare along the Flitch Way. Natural England's Accessible Greenspace Standards can be used to inform this. The outcomes should be used to update the GI Strategy and Figure 6 in particular. Clarity is needed on where the open space standards have derived from. Enhancement of provision is also key. The National Trust similarly highlight that the Council must not rely on Hatfield Forest as open space provision for new housing and that the Local Plan must address these deficits and ensure that adequate open space is delivered in a timely manner as new homes are built and occupied. The delivery strategy set out in the Local Plan, GI Strategy and the IDP.	The Council is finalising its suite of open space and leisure evidence to inform Reg 19 and these comments will be reflected on in that process. A further study on SANG was commissioned and has informed the strategic site design guidance in order broadly to accommodate sufficient green open space to meet NE standards to relieve visitor pressure on Hatfield Forest.
NDLP2676	National Trust						

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP2429	Saffron Walden Town Council				Population figures	Page 5 - 2.21 – states population of Saffron Walden as 17,018 – this information conflicts with other reports. The population in this document is contrary to that shown in the Open Space Update report by Knight, Kavanagh and Page which shows SW population as 14,970. It is likely the Open Space report is incorrect. Respondent queries the impact of any error on calculations for open space, community facilities etc and seek an amendment to the population figures in the Open Space report which may require projections to be re-run.	Population figures will be checked and updated as necessary and any implications for provision considered and factored into the preparation of the Reg 19 Plan.

Table 22: Viability Assessment

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP614	Natasha Styles	Group Planning Associate The Planning Bureau on behalf of McCarthy Stone	Natasha Styles		BNG	A detailed submission is made setting out evidence relating to the viability of delivering more than 10 % BNG.	The Council is satisfied the approach is robust and fit-for-purpose, however, the Council will ensure the consultants preparing the Viability work for them have reviewed the Reg 18 comments and made any adjustments where considered appropriate.
NDLP3895	Grosvenor Property UK				North Uttlesford	States that the North Uttlesford site was not included in the site development proposals and therefore not in the viability assessment. Detailed analysis of the attributes and soundness of the north Uttlesford site as a development proposal are submitted. Developer appraised two options for 1500 and 4500 homes and was able to afford associated infrastructure; hence questions the Local Plan statement that the viability assessment was such that a garden community could not be sustained. States that the viability assessment, accepting it is high level, did not test the north Uttlesford site in the same way as the other three man strategic sites. The viability assessment used samples that were very similar to the north Uttlesford housing types/values and it is considered that there is suitable evidence that a viable development can be achieved at North Uttlesford. This should not form a barrier to the further consideration of a suitable allocation for the site through future iterations of the plan; supported with commensurate viability evidence.	The viability of the North Uttlesford site was not tested because it was not a preferred site in the approach of the Spatial Strategy. The Council has not indicated that a Garden Community would not be viable; there are a series of reasons why a large garden community is not supported in this local plan, but the Council has also been clear that such proposals should be revisited in the next Local Plan that will need to be adopted by c. 2030/31.
NDLP614	Natasha Styles	Group Planning Associate The Planning Bureau on behalf of McCarthy Stone	Natasha Styles		Older people's specialist housing	A detailed submission is made setting out evidence relating to the viability of Extra Care Schemes.	The Council is satisfied the approach is robust and fit-for-purpose, however, the Council will ensure the consultants preparing the Viability work for them have reviewed the Reg 18 comments and made any adjustments where considered appropriate.

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP3197	Dianthus Land Limited				Saffron Walden infrastructure	The respondent considers that the viability assessment does not properly consider the Saffron Walden infrastructure especially the link road. There will need to be an equalisation process and development of a sufficient scale to afford the infrastructure. The respondent notes that two sites have a sec 106 so it will be difficult to raise additional funds.	The more detailed viability assessment will take place once the policies and site proposals are progressed and will be presented for consultation as part of the Regulation 19 . The assessment will utilise the costed Infrastructure Delivery Plan which will include the link road as necessary.
NDLP3097	Segro				Viability - employment space	The viability of non-residential/commercial schemes needs to be considered so that the viability of development and the delivery of much needed employment floorspace within the District is sustained..	Noted the point about non-residential floorspace. The next detailed Stage 2 viability assessment will be an essential part of the Regulation 19 plan to ensure that policies and infrastructure associated with all land uses are deliverable.
NDLP615	Natasha Styles	Consultee Organisation	Natasha Styles		Viability - specialist housing	Respondent queries the viability of providing the affordable housing element in accordance with the housing policy on specialist housing and extra care sites because of the variables that impact on values between specialist and non-specialist units of similar size and the extra costs in provision. This varies across the district too. Requests that the viability assessment is fine-tuned and reviewed . Request that the policy and supporting paragraphs be amended to make it clear that older person's housing is exempt from all types of affordable housing (in line with the viability study) to ensure the plan is sound, deliverable, justified and consistent with national policy.	The viability assessment was an initial overview of the Market at that time and took theoretical thresholds for affordable housing and market values. Now the proposed uses, policies and sites are becoming more clear the viability consultants will test the schemes and the Plan as a whole in much greater detail so that the full range of factors, including those identified by the respondent can be taken into consideration and applied to the particular requirements for the sites and the relevant policies.

Table 23: Infrastructure Delivery Plan

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP1845	East of England Ambulance				Ambulance Infrastructure & Facilities	The East of England Ambulance Service welcomes and supports the IDP endorsing the approach working with partners and commented that it needed to include Ambulance Infrastructure & Facilities including: Upgrading/ refurbishment of existing premises, or redevelopment/ relocation of existing ambulance stations; provision of additional medical, pharmacy & IT equipment & digital software; An increase in the number & type of ambulances; and the recruitment, training, equipping & tasking of Community First Responders. To assist in the preparation of the IDP (and the review of any S106 developer contributions SPD) they provided an Annex 3 in the rep submission offering facts and figures for inclusion in the next update of the IDP and site-specific viability work.	Comments and support are noted and will be considered to inform the Reg 19 Plan and IDP.
NDLP1847	East of England Ambulance						

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP2084	Councillor Fiddy				Culture	This comment highlights the benefits the arts provide for mental health and wellbeing and tourism revenue and that the baseline assessment report should feed into the IDP.	A baseline assessment of culture, creativity and the arts was undertaken earlier in the LP process and has informed the IDP and LP. The LP does include a policy supporting Public Art.
NDLP3704	Newport Parish Council	Newport Parish Council			Education	A representation highlights that the provision of a new car park adjacent to the primary school and land as part of the S106 for UTT/20/2632/FUL provides potential to expand the school into the area currently occupied by the existing car park and neighbouring land for early years provision. A new nursery building would be needed to replace this and would bring two sites into one facility. 3.96 - Continued mis-spelling of Joyce Frankland Academy, Newport. Appendix A figures are out of date, census 2021 Newport, Essex population is 2,941 which is substantially higher than the figures recorded.	Comments noted. Spelling errors will be corrected for Reg 19 and Census 2021 data should have been used for Reg 18 and will be checked and updated as necessary for Reg 19.
NDLP1681		Planning Advisor Essex Police			Emergency services	Essex Police welcomes the inclusion of the emergency services within the draft IDP and the recognition that growth and development within the district will impact on emergency services provision which should be considered within development and infrastructure planning and design. On-going consultation with Essex Police during the planning and design stages to ensure a policing perspective is encouraged to consider impacts on operational policing, road traffic management, designing out crime and infrastructure strategies.	Comments and support are noted. These comments will help to inform the Reg 19 plan and IDP.
NDLP2081 NDLP2678	Councillor Fiddy National Trust				Environment	Comment highlights that the evidence prepared included facilities that do not have accessible for the community including the Friends School as it closed in 2017 and the MOD site and that the evidence base report needs to be amended to reflect any gaps as these are likely to be larger than identified. The IDP needs to ensure the required provision for open space, recreation and sport is fit for purpose and meets the needs of future developments and is not underestimated or under-costed. The National Trust are pleased that the existing and future recreational pressure on Hatfield Forest is acknowledged but it does not set out the strategy for how these will be delivered. They state it is important that the evidence bases work as a suite of documents to ensure the delivery of adequate green and blue infrastructure across the district, reducing reliance and pressure on Hatfield Forest.	Noted. The Friends School is being reviewed and will be amended as necessary. The MOD site does have community access to a degree for some clubs and societies. The report does reflect the limited access and risk of tenancy for the community. These factors will be taken into account within the future leisure strategies that are being prepared to support Reg 19. Similarly with the Hatfield Forest evidence, the documents are being finalised and will be updated and form a collated evidence base in support of the GI Strategy, Leisure evidence and Local Plan policies and set out the infrastructure requirements in the IDP.
NDLP1835	Essex County Council				General comments	Three reps offer general comments. ECC highlight that: the IDP will need to reflect up to date costings that align with development phasing and requirements are appropriately reflected in the Local Plan and site allocation policies; that it's important to note the IDP is a 'living document' and a snapshot in time; and that information within the IDP will be	The Council will update the IDP for Reg 19 and this will be based on the latest available evidence from a wide range of resources, including working with site promoters of proposed allocations. Shortfalls in infrastructure from previous developments since the last adopted plan will be considered where possible. Whilst the Plan can

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP2821 NDLP2859	Stephen and Heather Ayles	NHS Property Services Ltd				subject to further review as part of the detailed planning application process, where costings (including indexation) will become known for the land use mix, housing mix, site and wider infrastructure requirements. Another rep refers to Newport stating that the shortfall in infrastructure associated with recent significant growth in the village should be included in the IDP. They list their needs as follows: a new purpose-built GP surgery; early years primary education; improvement in cycling and footpath provision to nearby settlements, particularly Saffron Walden; improvements to the bus services and connectivity to the airport; new sports pavilion for the recreation ground, to incorporate a facility to house the history group's artefacts and records. NHS Property Services Ltd request that when developing any future guidance on developer contributions or updating the SPD, the Council engage the NHS, as early as possible.	only require developers to contribute to the infrastructure needs of this Local Plan by planning for this infrastructure to come forward in places where the new infrastructure has widest possible benefit (accessible to the wider community etc), this approach does help to maximise the value of combining new development in sustainable locations. Engagement with all stakeholders will continue to Reg 19 and beyond.
NDLP466	Mr James Taylor	Future Infrastructure Risk Essex County Fire and Rescue Service			Essex County Fire and Rescue Service Response	The Essex County Fire and Rescue Service seeks the opportunity to input into the Local Plan, to support risk reduction and promote emergency service provision.	Comments are noted and the Council will work to ensure the Local Plan supports the provision of new development which accommodates emergency service functionality, in collaboration with Essex County.
NDLP4172	Saffron Walden Town Council				Sustainable Urban Drainage Systems	Sustainable Urban Drainage Systems should not be treated as public open space and should not offset a developers requirement to provide such space.	Noted. Flooding/Drainage and open space provision are addressed separately under the Infrastructure Delivery Schedule and do not preclude one another.
NDLP2321	Exolum Pipeline				Submission of Excom Gas Works	A map providing details of Excoms Pipelines in Uttlesford	Noted, Uttlesford will consider this in relation to allocated sites

Table 24: Green and Blue Infrastructure Strategy

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP1081	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			Active travel connections	Supports the GBIS and the proposed creation of a country park at Great Easton. Requests amendment to permit equestrian use and connections to bridleways as well as the Flitch Way. Requests that where pedestrians and cyclists are mentioned this should be amended to read: "all non motorised users: walkers, equestrians, wheelchair users and cyclists"	Note the support for the GBIS and acknowledge the recognition of the need for a new country park for a growing population. Consideration will be given to the wording as indicated.

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
		comments both on behalf of an organisation and as an individual					
NDLP723	Kim Crow				Car parking	Requests that a large car park be included with the country park (Strategic Opportunity 8) to avoid congestion on the local roads at popular times and events, and that could in itself be used further activities such as model car clubs. Would include separate areas for mobility parking.	Note the underlying support for the country park. Ongoing work will include an assessment of the intended range of supporting facilities including car parking and access arrangements in general., as well as the most appropriate location for a new country park.
NDLP3141, repeats NDLP3134	Stop Easton Park				Easton Park	Overall support for the GBIS Opportunity 8 and for the proposed creation of a Country Park at Easton Park which helps to meet the Plan's meet Strategic Objective SO1 , SO2, SO3, SO5, and SO6 . Several respondents provide descriptions of the salient points in the history of Easton Park and a plea to restore it to its public use and in line with the Countess of Warwick's wishes. Supports the the opportunity to recreate a historic landscape and integrate historic features and buildings, and protect heritage assets including The Gardens of Easton Lodge (Grade II Registered Gardens), Brook End Stables (Non-Designated Heritage Assets), and Little Easton Conservation Area (Little Easton Manor and Grade I listed church) providing opportunity for the re-establishment of the historic landscape character of the parkland. It will also give opportunity to enhance biodiversity, to address public open space deficiencies and to provide an alternative to Hatfield Forest. As well as the potential strategic function within the County's Nature Recovery Strategy Great Easton Country Park provides opportunity to extend woodland, linking to existing and ancient woodland and connecting habitats with accessible links to Great Dunmow, the Saffron and Harcamlow long distance footpaths and the Flitch Way. Mention should be made in the supporting statement in para 9.150 of the heritage and landscape features of the Easton parklands between Stansted airport and Little Easton that reflect the relative altitude of this plateau, the 'Essex Heights', its previous role as part of the Essex Forest that extended from Epping Forest to Thaxted and the former use as a WWII airfield. It would relieve visitor pressure on Hatfield Forest and address pressure on public open space from the expansion of Great Dunmow, Takeley and the 1200 homes consent at Great Easton . It will also meet the vision of SEP (Save Easton Park).	Note and welcome the considerable underlying support for the GBIS in general. Work is ongoing to assess the feasibility of the proposals which will be reported at the Regulation 19 stage and will include an assessment of the landscape heritage, biodiversity and nature value of the site as well as how measures can be put in place for it to function as a designated country park to comply with Natural England standards and criteria around access, visitor facilities, catchment population, environmental qualities etc. However, it is envisaged that the Country Park provision in this Local Plan will be focused in Saffron Walden with a commitment to secure a site at a later stage in the southernmost part of the district whilst securing generous amounts of open space as part of the strategic developments. At Takeley and Great Dunmow these spaces will be more than sufficient for the level of growth proposed. A longer term ambition for an even larger park will be retained for consideration in the next plan and beyond.
NDLP1072	Ms Sarah Hodgson	secretary: FWAG, area representative and member: EBA, Flitch Way			Flitch Way	Challenges whether the Flitch Way proposals will be taken forward seriously including the need to link into the wider network particularly into Dunmow town centre for which the respondent makes suggestions. There is a need for an agreed and	The Flitch Way is recognised in the GBIS as a strategic route but which would benefit from a review of its condition, linkages, usage , nature value etc. The council worked with consultants to undertake initial proposals and will explore

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
		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				considered plan to take forward proposals to improve the overall functionality of this route	how to take these forward to develop a programme of works to be agreed and consulted with interested parties and local organisations and which would be funded in part through development proposals.
NDLP1519 NDLP420 NDLP1608 NDLP1609	Natural England Mr Andy Dodsley Anglian Water Anglian Water				GBIS standards and multifunctionality	Different types of designated open space have different criteria and standards. Support for the GBIS 'Opportunities' that will strengthen the nature network and act as part of the county-wide nature recovery strategy particularly in the areas associated with the Rivers Roding and Chelmer, and Flitch Way and its inclusion in the South Area Strategy. Support for the GBIS 'Opportunities' that will strengthen the nature network and act as part of the county-wide nature recovery strategy particularly in the areas associated with the Rivers Roding and Chelmer, and Flitch Way , and welcomes inclusion in the Strategy for South Uttlesford. Encourages a joined-up approach to green and blue infrastructure and links to the Local Nature Recovery Strategy priority areas (to be published from March 2025) and hence can reinforce biodiversity net gain, alongside surface water management. Multifunctional benefits and access to GBI should be considered in line with the Government's Environmental Improvement Plan. Respondents welcome the development of a design checklist for Green and Blue Infrastructure and for major developments to include a GBI plan with stewardship. This should include Natural England's GI Design Guidelines which provide details on good GI design, linked to the ten characteristics of well-designed places set out in the National Model Design Code and the National design guide. The GBI Plan must set out clear, measurable targets for improving the quantity and quality of GI provision in Uttlesford and provide additional detail for specific projects that will be delivered and funded. Relevant standards should be applied locally and directly referenced in policies and design codes. Hatfield Forest is not a country park but does have SSSI and NNI status and could be described as 'semi-natural open space'. The GBI Master Plan's stewardship arrangements should cover 30 years and require an appropriate endowment . Biodiversity offset arrangements should be covered in policy as relevant . More detail is needed on the welcomed country park proposals which should also comply with SANG guidelines. Overall proposals should ensure access to open space within 15-20 minutes of neighbourhoods relating to size, proximity,	Comments are supportive, detailed, highly pertinent and helpful to ensuring an effective GI strategy, stewardship, tree cover and effective multifunctional use of open space. They will be used to refine policy, site guidance and as the GBIS is reviewed and will be taken on board in the Regulation 19 Plan, working in association with Natural England. The role of the GBIS is to try to provide the integration of proposals that benefit public access to local space, biodiversity, water management, health and wellbeing etc. It links with the county nature plan and LNRS recovery proposals where the District Council is working with the County. It will provide a framework for new projects and potential initiatives deriving from development proposals. The South Area Strategy adopts the recommendations in the GBIS and requires compliance through the policies that will progress the implementation of development and key strategic sites which together will help to implement the GBI Strategy, and link into the LNRS. The feasibility study into the creation of a country park and need for SANG assessment has informed amendments to the Master Plans for the strategic sites.

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
						capacity and quality of open space, and linking active travel, carbon emissions and green infrastructure. Targets for tree canopy cover should be set from a tree survey baseline using the NE urban tree canopy cover standard which is part of the NE GI Framework. The local plan's policy on tree cover is welcomed but need to require more detail on diversity of habitats, multi- functional design etc. Projects for tree planting and improvements to Flitch Way need to be detailed to ascertain how they are to be funded and delivered, including in relation to Hatfield Forest.	
NDLP1581	David Perry				Great Dunmow	The Town Council has undertaken new woodland planting south of Great Dunmow and encourages biodiversity both planting along grass verge and access to Flitch Way and the PRO network. Management of grass verges should be in accordance with Natural England biodiversity principles	Notes the suggestions for biodiverse planting and to explore the integration of the Town Council planting. The GBIS provides opportunity to develop these themes and to incorporate them in policy. The proposed amendments to strategic development at Great Dunmow will substantially reduce the area proposed for development and greatly increase the areas proposed as open space/ woodland/country park, thus greatly improving the GI aspects of the development and reducing any impact of development on the landscape and heritage setting of the area.
NDLP3705	Newport Parish Council	Newport Parish Council			Harcamlow Way	Existing and attractive Harcamlow Way will be punctured by a road which is contrary to the aspiration to use the route as a green corridor	The route of the Harcamlow Way in relation to the development proposals will be respected to ensure it is protected and enhanced as the master plans and other site proposals are reviewed for Regulation 19 .
NDLP2677	National Trust				National Trust	Notes that the Local Plan does not refer to the NT Open Space Update Report or the two evidence reports commissioned from Footprint Ecology. NT welcomes engagement on the subsequent stage of the GBIS and the strategic opportune but recommends such as the Country Park to help alleviate pressure in Hatfield Forest and which needs to be delivered early in the Plan period. The countryside park east of Saffron Walden should be developed according to SANG criteria as should the provision of other green space designed to complement new housing areas. The National Trust recommends that a monitoring strategy is prepared to monitor quantity and quality of new open space delivered during the local plan period. The Flitch Way Country Park is a linear 15-mile multi-user trail from Braintree to Bishops Stortford which passes along the boundary of Hatfield Forest. Recommendations made to improve and enhance the Flitch Way and facilitate access by non-motorized modes of transport to and from the Forest could assist with increased visits to Hatfield Forest. Any proposals will need to assess the recreational impacts that these could have on Hatfield Forest.	The role of the National Trust as a major stakeholder in the ownership and management of green open space heritage across the District is fully recognised, and that it seeks engagement in the next stages of the implementation of the GBIS. The council has commissioned a feasibility study into the creation of country parks to include SANG assessments. The feasibility study will be completed for the Regulation 19 stage and will include an assessment of the landscape heritage, biodiversity and nature value of the site as well as how measures can be put in place for it to function again as a designated country park to comply with Natural England standards and criteria around access, visitor facilities, catchment population, environmental qualities etc. Discussions on the deliverability of the Country Parks will establish the timescale for implementation. tThe Flitch Way is recognised in the GBIS as a strategic route but which would benefit from a review of its condition, linkages, usage , nature value etc. The council worked with consultants to undertake initial proposals

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
						<p>The National Trust welcomes the acknowledgement of the recreational pressures at Hatfield Forest and the recommendation for support for the conservation of Hatfield Forest. Greater reference should be made to the findings and recommendations in the Footprint Ecology visitor surveys and impact management report, the Strategic Access Management and Monitoring Strategy (Hatfield Forest Mitigation Strategy) and the agreed Zone of Influence (11.1km). The Trust strongly agrees that the provision of suitable alternative natural greenspaces (SANGs) must form part of the strategy for mitigating the recreational impacts of new residential development on Hatfield Forest. To be effective these should be delivered early in the plan period, prior to the occupation of any significant number of new dwellings. The Trust agrees that the ongoing monitoring and management of visitors to Hatfield Forest is essential and as set out in the Hatfield Forest Mitigation Strategy. Financial contributions from new developments towards this, in accordance with the Strategy and local plan policy will assist. The National Trust would welcome the provision of a new country park at Easton Park, located within the Hatfield Forest Zone of Influence and with the potential to significantly address recreational pressure on the Forest by delivering new public open space of a sizeable scale which could offer a range of facilities and opportunities. However, it is unclear how this would be delivered and is not proposed as an allocated site in the South Uttlesford Area Strategy. The National Trust considers that the current draft Local Plan does not adequately plan for the early provision of new public open space to reduce the recreational pressures on Hatfield Forest. A large, new public open space, such as a country park, must be planned for, as a minimum, close enough to Hatfield Forest, preferably within the Zone of Influence, to divert pressure away from the Forest. It would need to be of sufficient size to provide adequate dog walking space, and other increasingly popular recreational activities such as running and mountain biking, along with basic visitor facilities. Attractive in its own right in landscape terms it would provide for a range of habitats and biodiversity.</p>	<p>and is exploring how to take these forward to develop a programme of works to be agreed with interested parties including the National Trust and local organisations and which would be funded in part through development proposals. The Open Space Update Report and the two evidence reports commissioned from Footprint Ecology will be used to help inform any policy or supporting statement amendments for the Regulation 19 plan.</p>
NDLP1646	Wimbish Parish Council				Rowney Woods-new proposal	<p>Suggested incorporation for consideration Rowney Woods with the Carver Barracks area of c 500 acres that could serve as a country park for the north of the District. It would enable more woodland planting as part of the proposed strategic woodland initiative between Hatfield Forest and Thaxted and incorporate the Harcamlow Way. The parish council would be happy to assist the District council in exploring such a project.</p>	<p>The GBIS sets out a framework for improving the green infrastructure across the district and ideas such as that proposed by the parish council would help to deliver wider objectives. The proposed use of these lands for a country park was not included in the draft Regulation 18 Plan but parkland can be considered as an opportunity to support large scale development proposals where a significant amount of green space is required, subject to land owners'</p>

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
							willingness to participate. There are potential links to the LNRS network and wider woodland planting initiatives. The Regulation 19 plan GBIS policy can be reviewed to see if it can be made flexible to allow for such new suggestions where they meet the overall objectives of the GBIS. The assistance of the parish council is noted and welcomed.
NDLP883	Theresa Egan				Support	Overall support for the GBIS Opportunity 8 and for the proposed creation of a Country Park at Easton Park which helps to meet the Plan's meet Strategic Objective SO1 , SO2, SO3, SO5, and SO6 . Several respondents provide descriptions of the salient points in the history of Easton Park and a plea to restore it to its public use and in line with the Countess of Warwick's wishes. Supports the the opportunity to recreate a historic landscape and integrate historic features and buildings, and protect heritage assets including The Gardens of Easton Lodge (Grade II Registered Gardens), Brook End Stables (Non-Designated Heritage Assets), and Little Easton Conservation Area (Little Easton Manor and Grade I listed church) providing opportunity for the re-establishment of the historic landscape character of the parkland. It will also give opportunity to enhance biodiversity, to address public open space deficiencies and to provide an alternative to Hatfield Forest. As well as the potential strategic function within the County's Nature Recovery Strategy Great Easton Country Park provides opportunity to extend woodland, linking to existing and ancient woodland and connecting habitats with accessible links to Great Dunmow, the Saffron and Harcamlow long distance	Note and welcome the considerable underlying support for the GBIS in general. Work is ongoing to assess the outline feasibility of the proposals and will include an assessment of the landscape heritage, biodiversity and nature value of sites as well as how measures can be put in place for it to function as a designated country park to comply with Natural England standards and criteria around access, visitor facilities, catchment population, environmental qualities etc. However, it is envisaged that the Country Park provision in this Local Plan will be focused at Saffron Walden with Takeley and Great Dunmow accommodating generous amounts of open space to help relieve the pressure on Hatfield Forest. Whilst these will be more than sufficient for the level of growth proposed, a longer term ambition for a more formal country park will still be retained for consideration in the next plan period.
NDLP2090	Lauren Burgess					footpaths and the Flitch	
NDLP3134, repeats NDLP3141	Stop Easton Park					Way. Mention should be made in the supporting	
NDLP954	Sarah Brewin					statement in para 9.150 of the heritage and landscape features of the Easton parklands between Stansted airport and Little Easton that reflect the relative altitude of this plateau, the 'Essex Heights', its previous role as part of the Essex Forest that extended from Epping Forest to Thaxted and the former use as a WWII airfield. It would relieve visitor pressure on Hatfield Forest and address pressure on public open space from the expansion of Great Dunmow, Takeley and the 1200 homes consent at Great Easton. It will also meet the vision of SEP (Save Easton Park).	
NDLP1760	Mr Bob Brooker						
NDLP183	Jonathan Fox						
NDLP212	Mars Lisa Smith						
NDLP245	Oriel Gordon						
NDLP276	Alastair Farr						
NDLP415	Mark Lewis						
NDLP418	Mr Andy Dodsley						
NDLP419	Mr Andy Dodsley						
NDLP421	Mr Andy Dodsley						

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP422	Mr Andy Dodsley						
NDLP423	Mr Andy Dodsley						
NDLP424	Mr Andy Dodsley						
NDLP425	Mr Andy Dodsley						
NDLP426	Mr Andy Dodsley						
NDLP475	Simon Gardner						
NDLP720	Kim Crow						
NDLP1113	Maggie Stevens						
NDLP510	Chris Brooks						
NDLP646	Andrew Wise						
NDLP1508	Rosemary Drew						
NDLP1554	Stephen Dutton						
NDLP1507	Stephen Dutton						
NDLP438	Mr Bruce Drew						

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP477	Jo May						
NDLP792	Stuart Gilbert						
NDLP1778	Stephanie de Howes						
NDLP3135	Jeremy Toynbee						
	Stop Easton Park						
NDLP1478	Environment Agency				Water management	Proposals for the country park should have more focus on water and flood management. This would include biodiversity enhancement such as wetland creation. The response cites various SUDs criteria that should be applied and references the condition of rivers in the area that should be covered in consideration of water quality.	The management and consideration of multiple benefits of water are key concerns in the local plan. The respondent's comments will be considered in the context of the overall water management and water quality impact, acknowledging crossover with the GBIS.

Table 25: Landscape Sensitivity Study

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP2344	Richard Haynes				Methodology	Two representations have expressed concern relating to the methodology used in the landscape sensitivity assessment. This includes the approach to the assessment parcels and how they relate to the proposed site allocations and the apparent lack of views in the assessment process. They explain that some have been considered whilst others disregarded, e.g. on Landscape sensitivities. There view is that the parcels around different settlements were often too broadly drawn to consider landscape harm. The general assessment was often irrelevant when considering specific sites given the variety in sensitivity within different parcel parts. They use Takeley (parcel TPG1) as an example and the areas around Prior's Green and Smith's Green and Prior's Wood being completely different but being assessed as one. They put the failure done to the report lacking an analysis into views. They consider the report should be a visual impact assessment and note it was raised as an issue previously. The	The landscape sensitivity evidence has been undertaken in compliance with the NPPF, guidance and completed by appropriately qualified landscape architects. In the limitations section of the report it states '1.21 It [the landscape sensitivity report] should not be interpreted as a definitive statement on the suitability of certain locations for a particular development. It is not a replacement for detailed studies for specific siting and design and all developments will need to be assessed on their individual merits. 1.22 The study is based on an assessment of landscape character using carefully defined criteria. Landscape sensitivity is the result of a complex interplay of often unequally weighted variables (or 'criteria'). We have sought to address this issue in our summary of overall landscape sensitivity given for each assessment area (or 'parcel') – which considers how the criteria-based assessments
NDLP2555	Geoff Bagnall						

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
						outcome they say is that the proposed allocations are made without proper assessment of the impact the development would have n the most sensitive rural areas of the district.	combine to give an overall sensitivity result for the different development types under consideration. The assessments are based on professional judgement, taking account of the interplay between criteria, as well as those which might be more important to the landscape character of the parcel.' The study also considers the visual character of the landscape for each parcel. This includes a consideration of visual prominence, extent of openness or enclosure in the landscape (due to landform or land cover), the degree of intervisibility with the surrounding landscape (i.e. the extent to which potential development would be visible). Visually prominent landscapes are likely to be more sensitive to development than those which are more hidden or less widely visible. The study also considers whether the landscape forms a visually distinctive skyline or an important undeveloped skyline. Prominent and distinctive and/or undeveloped skylines, or skylines with important landmark features, are likely to be more sensitive to development because new buildings/structures may detract from these skylines as features in the landscape. As a strategic study, the LSA does not consider the potential effects on the visual amenity of specific groups of people at different locations (e.g. the views of walkers at a promoted viewpoint, or the private views of residents from their homes). These are issues that would be considered when individual proposal are put forward and addressed as part of a more detailed Landscape and Visual Appraisal (LVIA) submitted with a planning application. The Council has used this report in conjunction with all other evidence bases prepared in support of developing the Local Plan to reach a balanced judgement on which are the most sustainable sites for development. Individual site specific aspects are considered further both working towards the Reg 19 stage and later at the planning application stage.

Table 26: Landscape Character Assessment

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP1715	Thaxted Parish Council	Thaxted Parish Council			Landscape character assessment	It is suggested that the updated Landscape Work commissioned by UDC is more 'broad brush' than detailed work already undertaken by Thaxted for the Neighbourhood Plan. It is further suggested that the	The Council is satisfied the evidence supporting the emerging LP is fit for purpose, although some of the evidence will be updated to inform the Reg 19 Plan. It is noted that the submission

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NDLP1319	Su Morgan				objection - Thaxted specific	site proposal does not demonstrate how it will comply with the processed policy to protect and enhance views to the historic core of the village and that views of the church should be maximised. Two further comments add that the evidence is out of date and should use the Thaxted NP landscape evidence.	acknowledges that the proposed site allocation policy includes the requirement to protect the important landscape views including the views of the church and the Council is satisfied the proposal will be able to achieve this. It is important to understand that the Local Plan sets the strategic policy framework for the district for which Neighbourhood Plans need to be in conformity with and in some instances, it may be that the Local Plan will supersede any existing Neighbourhood Plans. However, in this case, for reasons set out in relation to the Thaxted proposals, it is recommended that strategic development does not come forward at Thaxted and the proposals included in the Reg 18 plan are removed.
NDLP1333	jAMES Redgwell						
NDLP1524	Natural England				Landscape character assessment support	Natural England are pleased that the draft plan is supported by a recent Landscape Character Assessment (LCA) to reflect an accurate, current landscape baseline. They infer compliance with Paragraph 174 of the NPPF and welcome the cross-referencing with Natural England's Nation Character Areas in the LCA and the detailed assessment of local character areas. These should be referenced in the design of new allocations and they would recommend the Council reviewing their guidance on an approach to landscape sensitivity in considering what the landscape sensitivity evidence needs might be to inform spatial planning and site allocations.	Comments and support are noted. The guidance will be considered and integrated into the next iteration of the Reg 19 Plan.
NDLP994	Great Easton and Tilty Parish Council	Clerk/Responsible Financial Officer Great Easton and Tilty Parish Council	Kate Rixson		Visual impact of development	No analysis done on the effect of development on views and the visual impact of development generally.	The landscape evidence base, alongside all other evidence base prepared to support the Local Plan, has been used to inform the proposed allocations and policies. This has included the site requirements and masterplanning of proposed allocations, which includes vistas and important views of landscape and heritage assets. Further work is being undertaken for Regulation 19 to help shape this further.

Table 27: Heritage Study

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP1716	Thaxted Parish Council	Thaxted Parish Council			Heritage Assessments	Some respondents have questioned the weight given in the Oxford Archaeology report commissioned by UDC to the impact on the heritage and countryside setting as a result of development of certain sites, Thatxed and Little Canfield in	UDC believes it has included and referred to the appropriate evidence base for the development of this plan. However, further work has been undertaken to inform the Reg 19 plan and a number of wider changes are being proposed. For example, strategic development at Thaxted is no longer included in the Plan and
NDLP2343	Richard Haynes						

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP2554	Geoff Bagnall					particular. Other respondents question compliance with NPPF para. 199-202.	development proposed at Takeley has been amended significantly to ensure there is no development close to the historic asset.
NDLP3185	Phoenix Life Limited and Mulberry S						
NDLP1379	Historic England	Historic Environment Planning Adviser, East of England Historic England			Heritage Assessments in relation to Local Plan Allocations	Claim that the supporting evidence understates the harm to the heritage setting of Church End, Great Dunmow, and North East Takeley. Recommendation to undertake HIA's for all sites. Lack of consistent use of site reference numbers and letters.	UDC believes it has included and referred to the appropriate evidence base for the development of this plan. However more detailed HIA's will be undertaken for these sites and the wider evidence will also be updated more generally.
NDLP968	Catesby Estates Ltd (Stacey Rawlings)	Director Roebuck Land and Planning Ltd	stacey Rawlings		Omission of Great Chesterford	It is suggested that by not assessing potential development sites at Great Chesterford from a heritage perspective, the Council have missed an opportunity to plan effectively.	There are no sites available at Great Chesterford at the current time. Several sites were assessed (albeit not for heritage) and found to be either unavailable or undeliverable. The potential for larger (garden community) scale development will be considered more effectively in the context of the next plan that will need to be adopted by 2031/31. This timing will also enable more effective consideration of the implications and relationship with Cambridge that is currently unable to progress its plan.
NDLP440	Jo May				Over-development	The importance of the historic environment in Uttlesford is raised and the suggestion that there should be no more new houses planned for.	UDC is committed to providing new housing in sustainable locations to provide for existing and new residents, in line with government national policy and legal requirements. Not planning for an appropriate level of housing does not restrict housing growth, it simply provides an opportunity for speculative and less well planned, and likely to be more harmful development to come forward, that has been the case in recent years where Uttlesford has not had an up to date plan or land supply. However, we are keenly aware of the historic context and have selected sites for potential development that are in sustainable locations and are expansions of pre-existing settlements.

Table 28: Duty to Cooperate Paper

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP1994	Home Builders Federation				DTC and housing needs	Five representations were received on the duty to co-operate (DtC) and housing need topic. One of these was pleased to see DtC discussions have started with some of the relevant organisations as part of the evidence base for the Local Plan. However, it noted that a number of these meetings	The Council is satisfied that it has met the Duty to Cooperate and sets full details out in its DtC Topic Paper. The work is ongoing through preparation of the Reg 19 Local Plan. An update to the DtC report will be published at that time and any forthcoming SOCG will be

Comment ID	Full Name	Company / Organisation	Agent's Full Name	Agent Company / Organisation	Comment Category	Comment Summary	Officer Response
NDLP1998	Home Builders Federation	Director Pigeon Investment Management Ltd	Sophie Pain			happened in 2020 and that they do not appear to have progressed as identified in the Councils Duty to Co-Operate Topic Paper, October 2023. Strongly advise that discussions resume.	published to the Council's website prior to that and at the Reg 19 Stage. However, the Council has engaged with all relevant DTC bodies in the run up to the Reg 18, including with Neighbouring Authorities and none have asked UDC to continue to their own housing need at the current time. The matter of housing is discussed more in relation to Core Policy 2.
NDLP3275	Weston Homes Plc					The Home Builders Federation (HBF) recognise that the Government propose to remove the DtC but until then the duty remains to consider strategic and cross boundary issues. They explain one of those key challenges facing the south of England is the unmet housing needs that have arisen due to constraints, such as the Metropolitan Green Belt. They believe the Council needs to work closely with its neighbouring LPAs to ascertain whether there are unmet needs in those areas but also to consider whether the plan should increase supply to address London's growing unmet needs. The HBF suggest that without considering this it risks the plans legal compliance and should at least consider and appraise reasonable alternatives, including a housing requirement that is substantially above the current requirement.	
NDLP3353	Gladman						
NDLP3983	Hawridge Strategic Land						
NDLP1132	Rob Snowling					<p>A couple of others echo the HBF rep by expressing the importance of the Councils ongoing engagement with neighbouring authorities on housing need and supply to ensure the Plan is legally compliant and positively prepared and another refers to relevant organisations.</p> <p>Another representation highlights some wording in the DTC topic paper in Table 1 around housing and neighbouring LPAs local plan timetables and the SOCG appended to the report. They suggest that the wording is contradictory in the reports and that 'An Authority being able to meet its own needs (which [the respondent] currently does not believe the Consultation Plan achieves) does not therefore mean it should not help meet any wider unmet need...'. Furthermore, they suggest there has been insufficient cooperation between neighbouring authorities. They highlight the missing SOCG with some of the neighbouring authorities and this demonstrates a plan consultation that has not been positively prepared nor meets statutory requirements of the Duty. They express that Uttlesford is unconstrained and it should be actively looking to help address regional unmet housing need.</p> <p>Another rep gave the example of the outcome of the 2020 Sevenoaks District Council Local Plan examination and subsequent Judicial Review, stating it was concluded that if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an</p>	

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						<p>Inspector must recommend non-adoption of the Plan. They go on to recognise that the DtC is a process of ongoing engagement and collaboration and that it is intended to produce effective policies on cross-boundary strategic matters. They reference planning guidance on SoCG and state these should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs.</p> <p>A rep refers to growth in Greater Cambridge in economic and housing terms, reflecting that this is all within a severely water stressed area, where the Environment Agency are presently objecting to any major planning applications which cannot demonstrate that the deterioration of waterbodies will be avoided. They are therefore, encouraged to see the emerging Local Plan refer to the fact that it must be prepared mindful of the need to deliver new homes to support jobs and economic growth in Greater Cambridge, mindful that a new Cambridge South Station will soon open that is very well linked to Uttlesford. Therefore, up-to-date conversations should resume as soon as possible, unless forthcoming changes to national planning policy suggest alternative means of engagement with other neighbouring authorities.</p>	
NDLP1818	Essex County Council				ECC representation	<p>Comment from ECC highlighting their willingness and need for cooperation throughout the preparation of the plan, they particularly highlight that the plan should deliver economic benefits for the existing and future population and that infrastructure requirements for developers are clear from the outset. They also highlight the responsibilities to consult ECC as the: Lead highway and transport authority, Mineral and Waste Planning Authority and the lead authority for education.</p>	Noted. Uttlesford is committed and will ensure continued engagement with ECC throughout the Local Plan process especially on the matters listed.