

Chapter 1: Introduction

Contents

Chapter 1: Introduction..... 2

Chapter 1: Introduction

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RD4S-S	Bill Critchley	Individual / member of the public		Additional Evidence Required	Comments note that the Local Plan should be supported by the following evidence: - Natural capital value of the land to be lost; - Ecological impact of the proposed development; - Carbon emissions implications of the Local Plan; and - Impact on the rural economy/food security.	The Council are of the view that the evidence base it has prepared is proportionate to the number and nature of the policies set out within the Local Plan. It is considered that these are sufficient to progress the Local Plan to examination and to demonstrate its soundness
ANON-QNH5-RDZF-J	Anglian Water	On behalf of an Organisation	Anglian Water	Anglian Water - General Support	Anglian Water notes their engagement with UDC which has occurred in the relation to the preparation of this version of the plan and its evidence base. The comment welcomes the changes made that respond to Anglian Water's comments to the Regulation 18 plan. The comment also notes support for the vision and strategic objectives within the Local Plan.	The Council acknowledge and appreciate the comments of support.
ANON-QNH5-RDZU-1	Julie O'Hara	On behalf of an Organisation	Braintree District Council	Braintree District Council - Duty to Cooperate	Braintree District Council highlight that they have no issues to raise regarding the soundness of the Local Plan and that they support Uttlesford's approach of working with Neighbouring Authorities.	Acknowledged.
ANON-QNH5-RDWV-Y	Gary Spilman	Individual / member of the public		Complexity of Consultation	The nature of the Local Plan consultation, including the matter of whether the Local Plan is 'Sound' and legally compliant, is complex and difficult for commenters to make meaningful representations. This is exacerbated by the length and technical complexity of the Local Plan and its evidence base. The Short Guide, whilst useful, omits detail on the implications of the Local Plan.	Noted. The Council appreciate that the breadth and complexity of matters being addressed within the Local Plan and its evidence is significant, however, by asking respondents to comment on issues of 'Soundness' and legal compliance, the feedback received will directly relate to the tests against which the Local Plan will be examined following its submission to the Planning Inspectorate. These questions are standard practice at the Regulation 19 stage of the process, but there is nothing to stop a respondent making any other comments they wish to.
ANON-QNH5-RDN8-R	Great Dunmow Town Council	On behalf of an Organisation	Great Dunmow Town Council	Consistency with 'Made' Neighbourhood Plans	The Local Plan, through its site allocations would conflict with a Made Neighbourhood Plan, including the policies which set defined development area and those that relate to the preservation of views. It is commented that the Neighbourhood Plan should not be discounted by virtue of being more than 5-years old. One comment also discusses paragraph 14 of the National Planning Policy Framework and that this provides a degree of protection from development that conflicts with a 'made' Neighbourhood Plan.	It is necessary for a Local Plan to be capable of being sound in itself, that is that it must be consistent with national Govt. policy, guidance and legislation. National policy makes clear that Local Plans should set 'strategic' policy, including meeting the districts housing requirement across a variety of sites and settlements. It is not always possible to do so without conflicting with 'made' Neighbourhood Plans which, by definition, look at non-strategic matters. The Council have looked to minimise conflict between these documents as far as possible, however, it is not possible to plan for approximately 4,000 dwellings through strategic allocations without developing beyond existing settlement boundaries. The PPG is clear that where there is conflict between Development Plan documents, the most recently adopted will take precedence. Any Neighbourhood Plans that are made or updated in the future will need to be in conformity with the strategic policies set out in the Local Plan. Lastly, it is important to note that Paragraph 14 of the NPPF relates only to decision taking and does not apply to the plan-making process.
ANON-QNH5-RDXZ-4	Richard Bowran	On behalf of an Organisation	Hatfield Heath Parish Council	Deliverability of the Local Plan	The Local Plan is not deliverable without taking account of wider infrastructure.	The Council agree that new residential and economic development needs to be supported by a wide array of infrastructure. The Local Plan includes policies which require new development to support the delivery of schools, habitats, public open spaces, sports pitches, and other important infrastructure. It is recognised that after several years of reliance on speculative development to meet local housing needs, there is an infrastructure deficit in the District. The Local Plan seeks to alleviate this through the siting of new infrastructure in locations which can benefit both new and existing residents. There is a limit to the level of financial contributions which can be extracted from new development to deliver new infrastructure whilst maintaining its viability. Whilst it may not be possible to overcome all existing infrastructure shortfalls, the Local Plan will go as far as possible to alleviate the deficit and will deliver far more infrastructure than would otherwise result from unplanned development.
ANON-QNH5-RDH7-H	Robert Birss	Individual / member of the public		Economic Development	The allocated employment development will increase road traffic, pollution, affect house prices, and is not appropriate.	The Council have published a suite of evidence, including relating to transport, which underpin its strategic allocations. These demonstrate that the highways impact of the proposed employment can be made acceptable through a series of mitigation. On the basis of this evidence, it would not be defensible for the Council to discount the selected sites on the basis of highways impact. Regarding the affect on house prices, as planning is intended to protect the public interest, private matters such as property value are not material considerations in the plan-making process.
ANON-QNH5-RDEP-7	Martin Crisp	On behalf of an Organisation	Essex Bridleways Association	Effect of Regulation 18 Comments	Some responses queried why their comments submitted under the Regulation 18 Local Plan had not resulted in a material change to the Regulation 19 Local Plan. Such comments included suggestions surrounding:	In response to the Regulation 18 Local Plan consultation, the Council received over 5,000 responses on individual issues. Each of these responses was reviewed, processed and responded to by Local Plan officers. The responses received contributed greatly to the next iteration of the Local Plan, the content of which is markedly changed and improved as a result of the consultation feedback received. Such changes

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RDN8-R	Great Dunmow Town Council	On behalf of an Organisation	Great Dunmow Town Council		- Safety of equestrians and availability of local equestrian friendly routes; - Removal of specific allocations.	include the evolution of the Local Plan allocations, as well as enhanced and altogether new policies which will support higher quality development going forward. All comments received were greatly appreciated, however, due to the complex and oftentimes competing nature of the comments, it was not always feasible to amend the Local Plan as requested by each respondent. This is particularly the case where suggestions would have significant implications for the deliverability of specific developments or the plan as a whole. A summary of the extent of consultation undertaken and the key issues identified can be found on the Council's Local Plan consultation webpage here: https://www.uttlesford.gov.uk/article/9425/Regulation-18-Consultation-Report
ANON-QNH5-RD1W-T	Zhanine Smith	On behalf of an Organisation	Essex County Council	Essex County Council - Duty to Cooperate	Essex County Council notes its role as the responsible authority for the Greater Essex Local Nature Recovery Strategy and notes general support to the reference to local nature recovery in Chapter 1. Essex County Council recommend an additional reference to local nature recovery at Paragraph 1.11. ECC make clear that they consider UDC have met their Duty to Cooperate.	Noted. The Council will make the recommended modification to paragraph 1.11 and will continue to liaise with Essex County Council to facilitate a positive and constructive approach.
ANON-QNH5-RD75-X	Graham Jolliffe	Individual / member of the public		Extent of Consultation	Some comments state that the Council's community consultation throughout the plan-making process has been lacking. Specifically, that the Local Plan was progressed despite resident and some Councillor objection. It is noted that the full suite of Regulation 18 comments was poorly publicised and inaccessible. The Local Plan Panel meetings lacked any meaningful discussions and there was little debate. Major changes occurred as part of the Regulation 19 Local Plan publication, however, these should have first been consulted on. One commenter queries why they were not directly contacted regarding the Local Plan proposals despite being impacted by them.	In preparing its Local Plan, the Council have undertaken a variety of forms of public consultation. This began in November 2020 with a consultation on the 'Issues and Options' for the Local Plan to consider. This was then followed in September 2023 with a consultation on the first full draft of the Local Plan (Regulation 18). Feedback from this consultation was then incorporated into the Local Plan, leading to the 'Regulation 19' draft of the Local Plan which is the subject of this consultation. It is worth noting that many Local Authorities will choose not to publish any policies or site allocations in their Regulation 18 Local Plan consultation, limiting this document to discussing only 'Issues and Options'. Uttlesford however were keen to ensure residents and interested parties could comment on a comprehensive Local Plan draft as soon as possible. The Local Plan Panel meetings in between Reg 18 and 19 stages provided an opportunity for ongoing public feedback and for Councillor's to discuss updates to the Local Plan, however, as is to be expected, much of what was discussed was work in progress and there were limitations on exactly how detailed any debates could be. During these consultation periods the Council have utilised a variety of mediums to engage with local residents, including news releases & local newspaper coverage, e-newsletters, social media, drop-in exhibitions, distributing Local Plan material to Parish Councils, and (at Reg 18 stage) a leaflet drop to all Uttlesford residences. In doing so, the Council has exceeded its statutory obligations with regards to the extent of public engagement provided.
ANON-QNH5-RDAQ-4	James Firth	On behalf of an Organisation	Bower Croft Ltd and Oaks Croft Ltd			
ANON-QNH5-RD34-S	Adam Davies	On behalf of an Organisation	The Davies Family			
ANON-QNH5-RD3M-J	Adam Davies	On behalf of an Organisation	Ceres Property on behalf of Richard Martin M Scott Properties Ltd			
ANON-QNH5-RDRS-Q	Richard Agnew		Gladman Developments Ltd	General Support	Comments provided general support for the progression of a new Local Plan in Uttlesford. Particular comments noted the importance of an up-to-date Local Plan in allowing the Council to regain a greater level of control in planning decision making, and the role of the new Local Plan in placing continued importance to the District's historic environment. Certain responses noted the plan and its policies were sound and legally compliant, whilst other responses contextualised this support, noting that further improvements could be made as recommended by their responses to specific policies.	The Council acknowledge and appreciate the comments of support.
ANON-QNH5-RDRD-8	N/A	On behalf of an Organisation	Little Easton Parish Council			
ANON-QNH5-RDRT-R	Tracy Coston	On behalf of an Organisation	Littlebury Parish Council			
ANON-QNH5-RDX8-2	Katrina Levy	On behalf of an Organisation	Widdington Parish Council			
ANON-QNH5-RDXZ-4	Richard Bowran	On behalf of an Organisation	Hatfield Heath Parish Council			
ANON-QNH5-RD9D-F	Stop Easton Park	On behalf of an Organisation	Stop Easton Park			
ANON-QNH5-RD9A-C	Nick Dukes	On behalf of an Organisation	Littlebury Residents Group			

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RDN8-R	Great Dunmow Town Council	On behalf of an Organisation	Great Dunmow Town Council	Great Dunmow Town Council Meeting	Great Dunmow Town Council have provided a summary of the discussions held at an extraordinary meeting of its Planning and Transport Committee, which informed its response to this Regulation 19 consultation.	The Council acknowledge the context of Great Dunmow Town Council's extraordinary committee meeting.
ANON-QNH5-RDT1-Q	Sharon Critchley	Individual / member of the public		Interpretation of Policy	One comment suggests that what constitutes 'good design' is not given clarity and is open to interpretation.	The Plan includes Core Policies 52 and 52a which set clear standards for the design of new developments. This is supplemented by Uttlesford's new design code which sets out in great detail what these standards mean in practice to ensure new developments are planned to a high quality.
ANON-QNH5-RDT1-Q	Sharon Critchley	Individual / member of the public		Lack of Focus on Existing Residents	The Local Plan focuses primarily does not support existing residents in overcoming their day to day challenges.	Whilst the Local Plan is a very important document and has several implications, it is fundamentally a document through which new development is managed. The Local Plan can assist with delivering new infrastructure, which is of benefit to existing communities if well-located, however, the Local Plan is limited in its capacity to change the day-to-day activities of existing residents where they do not relate to changes in the built environment.
ANON-QNH5-RD1S-P	Andrew Martin	On behalf of an Organisation	S. Robinson Farms Ltd	Lack of Local Plan soundness	Comments which state that the Local Plan as a whole does not meet the tests of soundness set out within the National Planning Policy Framework (NPPF). These comments are often made with reference to individual comments on specific policies which are provided separately. Broadly, comments state that the plan is not founded on sufficient evidence, does not facilitate sustainable development, and does not overcome concerns raised by the inspector reports made in relation to previous withdrawn Local Plans. Moreover, some comments state that the Local Plan has been hastily prepared in an effort to avoid the changes to the Standard Method and the NPPF that have been proposed by the Government. In not planning for the emerging national policy context, the Local Plan is not fulfilling its statutory obligations in delivering housing against its unmet need. One comment states that the Local Plan would be considered 'out-of date' immediately upon adoption even if its examination was successful.	Comments on the soundness of the Local Plan in relation to specific chapters and policies are addressed separately, however, the Local Plan as a whole is considered to be both sound and legally compliant by the Council. To this effect, the plan is justified with the body of evidence supporting it being substantial and far exceeding the minimum statutory requirements. The Council have demonstrated that its objectively assessed needs can and will be met in full and, in collaboration with the Council's partners, will be delivered within the plan period so as to ensure the proposals are effective and positively prepared. The Local Plan is deemed to be in compliance with all other aspects of national policy. On the emerging changes to national policy, it is important to note that the Council's Local Development Scheme, which details the targeted timeframes for the consultation and submission of the Local Plan for examination, was approved in October 2023 prior to the general election and the new Government's consultation upon the NPPF. The Council is seeking to meet its agreed timeframes within the Local Development Scheme to ensure that the District benefits from an up-to-date Local Plan as soon as possible, however, the process has not been expedited in any way as a result of the proposed changes to the NPPF. As part of these proposed changes, the Government has set out clear transitional arrangements (paragraph 226) for Local Authorities in the midst of preparing or adopting a new Local Plan, specifically to ensure that plan making does not halt unnecessarily. The Council has had full regard to these arrangements and consider that the Local Plan can proceed as presently drafted whilst meeting the tests of soundness and complying with the Duty to Cooperate. The Local Plan would not be considered 'out-of-date' upon adoption as is clear from national policy.
ANON-QNH5-RDDJ-Z	Mark Behrendt	On behalf of an Organisation	Home Builders Federation			
ANON-QNH5-RDAY-C	Samuel Bampton	On behalf of an Organisation	Pelham Structures Ltd			
ANON-QNH5-RD3H-D	Kim Rickards	On behalf of an Organisation	Durkan Estates Ltd			
ANON-QNH5-RDWV-Y	Gary Spilman	Individual / member of the public		Local Plan Implications	One comment queries whether the Local Plan will: - Mean no more gas boiler installations; - Deliver new Park and Ride facilities; and - Ensure more sustainable building fabrics.	The new Local Plan includes a policy to require new dwellings to achieve a net zero operational carbon standard. This will require new development proposals to prioritise energy efficient building fabrics and renewable sources of energy to secure planning permission. Proposals for new gas boilers would therefore be heavily resisted. There are no proposals for new park and ride facilities specifically, though the local plan does prioritise the installation of new public transport facilities within and adjacent to allocations for new development. Moreover, developer contributions stemming from new development can help ensure existing bus routes can benefit from increased frequency of service.
ANON-QNH5-RDAQ-4	James Firth	On behalf of an Organisation	Bower Croft Ltd and Oaks Croft Ltd	Local Plan Period	It is noted that the Local Plan Period should extend to the end of 2041 rather than March 2041, to ensure that the Local Plan will cover a minimum of 15 years from the point of eventual adoption. One comment requests that this period be extended even further to ensure that the Council takes a long term view of planning for the District.	With Local Plan adoption expected in early 2026 there is no need to consider extending the plan period.
ANON-QNH5-RDAD-Q	Marie Jasper	On behalf of an Organisation	Landsec			
ANON-QNH5-RD7U-X	Saffron Walden Town Council	On behalf of an Organisation	Saffron Walden Town Council	Local Plan Reviews	Paragraph 1.16 should be clearer in stating that a Local Plan Review is not merely administrative but may include significant changes. What will trigger the Local Plan reviews?	Reference to Local Plan reviews is consistent with national policy. Local Plan Reviews are triggered every 5 years and are necessary "to ensure that policies remain relevant and effectively address the needs of the local community" (Planning Practice Guidance: Plan-making).Reviews should be proportionate to the issues in hand. However, UDC have made clear that they intend to start work on the next Local Plan immediately after this one is adopted (commence c. 2026 with adoption c. 2030) to ensure Uttlesford is ahead of the curve, once it has an up to date an adopted plan, following a gap of 20 years without a new plan.
ANON-QNH5-RD4S-S	Bill Critchley	Individual / member of the public		Loss of Agricultural Land	One comment notes that development should not occur on sites with an agricultural land classification of between 1 and 3b, as this would have a negative impact on food supplies.	The Government's methodology for calculating a Local Authorities' housing need determines that approximately 13,500 homes are required in Uttlesford between 2021-41. Given the rural nature of the District, it is only feasible to meet this housing need through the release of greenfield sites at a strategic

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
					One comment notes that the agricultural industry is not supported through the Local Plan.	scale. In turn, almost all of the agricultural land in Uttlesford is classified as grade 2, 3a, or 3b. It is therefore necessary to release parcels of agricultural land to meet the housing need identified through the Government's methodology. The loss of agricultural land does not comprise the 'exceptional circumstances' required to deviate from the calculated housing need and such an approach would not be compliant with national policy. Furthermore, restricting housing within the aforementioned land classifications would entail forfeiting the genuine and pressing housing needs of the District. Lastly, the Council supports the diversification and growth of Uttlesford's rural economy. Whilst planning has fewer controls over agriculture, the diversification of rural businesses including in the Agri-tech, Agri-food and Forestry sectors will be supported where they preserve the character of the rural surrounding, as detailed in Core Policy 21.
ANON-QNH5-RDT1-Q	Sharon Critchley	Individual / member of the public				
ANON-QNH5-RDA3-6	Hyacinth Cabiles	On behalf of an Organisation	NHS Property Services (NHSPS)	NHS - Healthcare	New and improved healthcare is resource intensive and depends upon new development making contributions to alleviate pressure in the system. Planning policies should enable the delivery of essential healthcare infrastructure in consultation with the NHS.	Acknowledged. The Council agree with the comment and are seeking developer contributions for such purposes. The Council will continue to consult with the NHS throughout the plan-making and development management process to ensure sufficient contributions are extracted from new development.
ANON-QNH5-RDY5-Z	Clare Skeels	On behalf of an Organisation	North Herts Council	North Hertfordshire District Council - Duty to Cooperate	NHDC confirm that an MOU between NHDC and Uttlesford was signed in 2024 and that they have no specific comments on the Regulation 19 Local Plan.	Acknowledged.
ANON-QNH5-RD7U-X	Saffron Walden Town Council	On behalf of an Organisation	Saffron Walden Town Council	Relationship between the Local Plan and Made Neighbourhood Plans	It should be made clear within Chapter 1 that Neighbourhood Plans do not have equal weight to the Local Plans and that the relationship is hierarchical.	National policy makes clear that Local Plans should set 'strategic' policy, including meeting the districts housing requirement across a variety of sites and settlements. Conversely, Neighbourhood Plans address non-strategic issues. The relationship, however, is not hierarchical in terms of weight afforded, with both types of document forming part of the 'Development Plan', the primary consideration in planning decisions. It is important to note that following the adoption of a new Local Plan, 'made' Neighbourhood Plans will remain a part of the 'Development Plan', against which applications for development will be assessed for conformity, albeit if there were any conflict between plans, it would be the most recently adopted plan that takes precedence. And, any new or updated Neighbourhood Plans would need to be in conformity with the strategic policies of the new Local Plan.
ANON-QNH5-RD4S-S	Bill Critchley	Individual / member of the public		Typographical Errors	Comments noted that the Local Plan may contain typographical errors. One comment notes that the Local Plan should be amended to include clear paragraph/section numbers to ensure effective and accurate referencing of policies.	Noted. the Council are able to propose modifications to fix typographical issues in the Local Plan and will do so where these are highlighted through the Regulation 19 consultation or discovered separately. The Local Plan text already contains paragraph/policy/ section numbering.
ANON-QNH5-RDDJ-Z	Mark Behrendt	On behalf of an Organisation	Home Builders Federation			
ANON-QNH5-RD7U-X	Saffron Walden Town Council	On behalf of an Organisation	Saffron Walden Town Council			
ANON-QNH5-RD21-N	John Spencer White	Individual / member of the public		General	Comment refers to the Plan Soundness but does not make any wider comments.	Noted.