

Local Plan Evidence Base

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## Local Plan Evidence Base

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ANON-QNH5-RD1M-G	Cllr Geoff Bagnall	Individual / member of the public		Baseline data - Covid	The ‘base’ highways evidence dates back to 2021 during the Covid Pandemic and therefore the baseline data does not represent an accurate picture of traffic movements. The ‘mitigation measure’ for over capacity issues on the A120 for the traffic to be directed onto the B1256 is flawed and has not been challenged. An up to date highways assessment should be undertaken.	The Council is satisfied that the transport assessment evidence and survey data that underpins the assessment was undertaken in line with the relevant guidelines issued at the time. Caution was taken when considering the modelling outputs from the baseline data, and comparisons were drawn with pre-COVID data. To ensure a robust assessment, 2021 Base flows were factored up during the forecasting to account for this. The transport evidence base prepared in support of the emerging Uttlesford Local Plan forms a robust and detailed analysis of the current and forecast future performance of the transport network across the district and beyond. It provides a proportionate analysis of future demand that will be placed on the network due to Local Plan development, and the interventions required to mitigate the impacts on local communities. The evidence is under pinned by the development of two transport models which were built in accordance with Department for Transport (DfT) TAG guidance, whilst also meeting the requirements of the National Planning Policy Framework (NPPF).
ANON-QNH5-RDTP-P	Ryan Walker	On behalf of an Organisation	abrdn Investments and Mulberry Strategic Land Limited	Call for Sites	The respondents suggest that there may be suitable alternative sites which have not been considered due to the fact that the last Call for Sites was conducted in 2021	Although the last formal call for sites took place in 2021, the HELAA assesses sites which were submitted after the call for sites closed, including sites submitted alongside Regulation 18 representations and those which were submitted for consideration by email or other means. The sources of sites are clearly detailed in the HELAA methodology.
ANON-QNH5-RDCX-D	Theresa Trotzer Wilson	On behalf of an Organisation	HATFIELD BROAD OAK PARISH COUNCIL	Call for sites is out of date and does not reflect current availability	The Larger Villages Housing Requirement is calculated using a HELAA that uses and out-of-date Call for Sites from 2021.	Although the last formal call for sites took place in 2021, the HELAA assesses sites which were submitted after the call for sites closed, including sites submitted alongside Regulation 18 representations and those which were submitted for consideration by email or other means. The sources of sites are clearly detailed in the HELAA methodology. The Larger Villages Housing Requirement takes the updated HELAA information into account and so is based on the latest available information.
ANON-QNH5-RDW7-Z	Simon Phillips	On behalf of an Organisation	Godwin Developments	Challenging the Employment Needs Update Report	Representation challenging the Employment Needs Update Report evidence with CBRE reviewing the evidence. Disagree with the Employment Needs Update Report regarding plot ratios, overall margins and the spatial distribution of employment land needs. Alternatively CBRE assesses that 65% of need should be focused around Stansted Airport and the M11/A120. Alternative employment land forecasts provided which forecast 57.5ha (taking into account Northside), with 29.1ha around Stansted instead of 18 as per the Reg 19 draft plan. CBRE argue that the land sound of the A120 and north of Stortford Road, Great Dunmow is not within the ‘wider Stansted’ area.	The Employment Needs Update Report is considered a robust and sound technical piece of evidence that underpins the spatial strategy and employment site selection process for the Local Plan, produced by specialist consultants that are experts in their fields having supported numerous councils with producing sound local plans. Regarding plot ratios, 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. Regarding the overall margins, 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. Regarding the overall need and spatial distribution, 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 Employment Site Selection Topic Paper updates these figures taking into account the latest completions and commitments figures, resulting in a residual need of 31.5ha. The Reg 19 draft makes provision for 36ha of industrial land at Great Dunmow and Takeley, plus a further 2.5ha at Saffron Walden which comfortably exceeds the requirement. It is considered that the allocation on the

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						B1256 and A120 junction west of Great Dunmow is well-located for both the wider Stansted area and also Great Dunmow itself.
ANON-QNH5-RDXH-J	Mark Fisher	Individual / member of the public		Complex, local methodology (not national)	Comment stating that the methodology is a local UDC one, not a national one, and is complex.	There is no national methodology to calculating housing requirement figures for larger villages or for Neighbourhood Plans. NPPF Paragraph 67 outlines the considerations to be taken into account in establishing housing requirement figures, which “reflects the overall strategy for the pattern and scale of development and any relevant allocations”. The Larger Village Housing Requirement Topic Paper outlines how the NPPF and Planning Practice Guidance requirements have been addressed, and then explains how the four scenarios have been prepared before generating a mid-point average of the four to determine the housing requirement figures and the residual figures taking into account completions and commitments, ensuring that the figures are deliverable by factoring in HELAA capacity. It is slightly complex in that there are numerous ‘top down’ and ‘bottom up’ issues at play and to be balanced, but it is considered a sound and evidence-based approach in the Uttlesford context.
ANON-QNH5-RDUE-C	Justin Brannon	Individual / member of the public				
ANON-QNH5-RD9K-P	Andrew Ttofalli	Individual / member of the public				
ANON-QNH5-RDCW-C	Jane Smith	Individual / member of the public				
ANON-QNH5-RD9T-Y	James Ward	Individual / member of the public				
ANON-QNH5-RD74-W	Zoe Rutterford	Individual / member of the public				
ANON-QNH5-RD7Z-3	Michele Turner	Individual / member of the public				
ANON-QNH5-RD77-Z	Derek Ward	Individual / member of the public				
ANON-QNH5-RD7J-K	Fiona Price	Individual / member of the public				
ANON-QNH5-RDWF-F	Amanda Malins	Individual / member of the public				
ANON-QNH5-RDW6-Y	Laurence Ward	Individual / member of the public				
ANON-QNH5-RDWR-U	Philip & Jenny Loader	Individual / member of the public				
ANON-QNH5-RDWH-H	Catherine Ward	Individual / member of the public				
ANON-QNH5-RDR9-W	Peter Canning	Individual / member of the public				
ANON-QNH5-RDRX-V	Paul Maxin	Individual / member of the public				

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ANON-QNH5-RDHT-E	Lisa Fuller	Individual / member of the public				
ANON-QNH5-RDT6-V	Anthony Gibbs	Individual / member of the public				
ANON-QNH5-RDXX-2	Andrew Ttofalli	Individual / member of the public				
ANON-QNH5-RDN2-J	Derek Blizzard	Individual / member of the public		Data - Car use in Uttlesford	The Respondent highlights that the Plan draws from data collected and published in 2021, following the COVID-19 pandemic. Government data suggests that car use in 2020-2021 dropped as far as -21.9% when measured against pre-COVID levels.	The Council is satisfied that the transport assessment evidence and survey data that underpins the assessment was undertaken in line with the relevant guidelines issued at the time. Caution was taken when considering the modelling outputs from the baseline data, and comparisons were drawn with pre-COVID data. To ensure a robust assessment, 2021 Base flows were factored up during the forecasting to account for this.
ANON-QNH5-RD1N-H	Barbara Light	Individual / member of the public		Duty to Co-operate	A resident suggests that Council have failed in its Duty to Co-operate using the planning permission at Hinston as an example where 1,500 homes and new research campus have been granted 5 miles north of Saffron Walden in South Cambridgeshire but there is no evidence of agreements with them on this given the pressure on infrastructure requirements likely in Uttlesford.	UDC have engaged South Cambs Partnership including Cambridge City and all its neighbouring authorities and County Council's on the Local Plan throughout its preparation, as set out in the Duty to Co-operate Topic Paper. A SoCG was published at Reg 19 stage and final signed version will be available at Submission.
ANON-QNH5-RD4X-X	Sally Taylor	On behalf of an Organisation	Birchanger Parish Council	Duty to Cooperate - East Herts DC	Collaboration with East Herts DC is needed on planning for industrial land in the area around M11 J8 and the Countryside Protection Zone, with Statements of Common Ground agreed.	A signed SoCG was achieved for Reg 19 of the Local Plan which highlights the strategic issues between East Herts and Uttlesford. These include employment, the Airport and transport issues to name a few. Any issues raised by East Herts through the DtC process were addressed effectively and are summarised in the appendix to the SoCG. Any further issues raised through the Reg 19 process will be summarised through this consultation statement process and where necessary the SOCG updated. An updated DtC report has also been published with the Submission version of the Plan.
ANON-QNH5-RD1W-T	Zhanine Smith	On behalf of an Organisation	Essex County Council	Duty to Co-operate - ECC - SoCG needed	<p>ECC is broadly satisfied that UDC has met the duty to co-operate. But further discussions are needed to address education, transportation and infrastructure (IDP) matters. This is necessary due to ECC's key role as an infrastructure partner, that will seek to ensure that the development allocations proposed are properly funded by the proposed development, are realistic and do not place an unnecessary (or unacceptable) cost burden on ECC's ability to deliver unfunded infrastructure or that raise other unmitigated impacts.</p> <p>Recommended modifications (outlined in their Appendices 1 to 5) include amendments to policies, supporting text, Site Development Templates, local plan appendices and the Policies Map to ensure consistency with national policy, effective delivery, reflect the evidence base, and address outstanding ECC representations made at the Regulation 18 stage. Amendments and corrections are also sought to the IDP to ensure accuracy. They suggest that ECC enter into a Statement of Common Ground with UDC to address their representations with a view of supporting UDC at Examination, where this can be done and is appropriate.</p>	UDC welcome the continued support and assistance of ECC to engage on DtC matters.
ANON-QNH5-RDHK-5	Jackie Deane - Parish Clerk	On behalf of an Organisation	Takeley Parish Council	Duty to Cooperate - importance	In their full representation Takeley Parish Council have commented on the content of the SoCG, one they believe is missing (Harlow DC) and comment on the similarity between the SoCG but comment notably that only one LPA has recognised the regional importance of Stansted Airport	Harlow District Council have a signed SoCG dated July 2024 and was published with the Reg 19 Plan on page 203 of the DtC Topic Paper. The similarity in the SoCG is because of the necessity to comply with the Duty as set out in the Localism Act 2011 and national policy and planning practice guidance. There are often similar issues across stakeholders and so for consistency we started with the same wording across all stakeholders

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				of Stansted Airport	to employment under the Duty to Co-operate and that no strategic co-operation has been agreed. They state that SoCG need to be signed on housing needs between relevant LPAs and that all stakeholders should have signed SoCG. Concluding, they do not believe that any strategic matters have been addressed and that the allocation of a strategic settlement at Takeley has the potential to affect the future employment growth of the area which would have long term regional repercussions. They therefore consider it would not lead to a sound plan and that a revised strategy is required to locate housing and employment development in more sustainable locations.	which was adjusted through engagement with each body as appropriate until each were content it reflected the issues between their organisation or authority area and Uttlesford. There are currently 2 SoCG that include Stansted Airport as issues for them that includes East Herts DC and Herts County Council. We have secured eight additional SoCG for Submission and these are: Cambridge City Council and South Cambridge DC; Essex County Council; Natural England; National Highways; Network Rail; Manchester Airport Group; Essex County Fire and Rescue Service; National Trust. There are no outstanding new SoCG and some minor updates to those published with the Reg 19 have been made and those are set out in the updated DtC Topic Paper.
ANON-QNH5-RDRS-Q	Richard Agnew	On behalf of an Organisation	Gladman Developments Ltd	Duty to Co-Operate - Legislation	A developer sets out the requirements in national policy and the upcoming change and that set out in guidance and what the LPA should be doing to meet the Duty to Co-Operate	The Council is satisfied that they have met the Duty in accordance with legislation and guidance. Details are set out in its published Duty to co-operate topic paper with the Reg 19 Local Plan. Engagement continues with those stakeholders where this is necessary up to Submission and beyond in some cases to ensure all matters are resolved through any amended Statements of Common Ground or new ones as might be the case.
ANON-QNH5-RDAS-6	David Churchill	On behalf of an Organisation	Wethersfield Homes Ltd	Duty to Co-operate - new standard method	A developer has expressed that the proposed changes to the planning system may not be fully enacted. This notwithstanding, the Council has a duty-to-cooperate with its neighbouring Councils and it should reflect on the potential wider impacts of the proposed changes to the planning system within this wider context. The new standard method results in an increase in the local housing need in Uttlesford of 74 dwellings per annum (from 675 to 749) which is significant over the Plan period. In addition to this, the increase in the local housing need in the surrounding area are greater and early engagement with neighbouring Councils will be critical.	UDC have an extremely out of date Local Plan. It is very important for the Council and local residents to get an Adopted Plan as soon as possible to create certainty and stability in the planning system in Uttlesford. UDC have worked with its neighbouring LPAs and as each of them are at differing stages of plan making and the impending changes to the Planning system the Council's decision and that in line with the Government was to press on with the Local Plan. And when the new standard method and any additional housing targets start to apply these can be planned for in the next iteration of the plan which is likely to be upon the immediate review of the Adoption of this Local Plan.
ANON-QNH5-RDRT-R	Tracy Coston	On behalf of an Organisation	Littlebury Parish Council	Duty to Co-operate - Support	Littlebury Parish Council consider that appropriate engagement with stakeholders, in particular neighbouring authorities, including our closest neighbouring authority (South Cambridgeshire District Council). There do not appear to be any significant areas of disagreement which could affect our parish.	Noted.
ANON-QNH5-RDZV-2	n/a	On behalf of an Organisation	Chelmsford City Council	Duty to Cooperate - Support - Chelmsford City Council	Chelmsford City Council welcomes the opportunity to comment on the Local Plan prior to help influence the document and monitor the key cross-boundary and strategic issues that affect Chelmsford City. They welcome the commitment to continue joint working over the development of the plan making process to consider any cross-boundary concerns regarding housing, employment, transport infrastructure, education, Gypsy, Travellers and Travelling Showpeople, Hatfield Forest and Essex Coast RAMS. They confirm a SoCG has been signed between the Councils and that they do not raise any objections under the Duty to Co-operate.	Noted with thanks.
ANON-QNH5-RDZY-5	Mark Norman	On behalf of an Organisation	National Highways	Duty to Cooperate and transport issues - National Highways	National Highways confirmed they have been working closely with the Council on the New Local Plan, meeting regularly since 2020. They acknowledge that the transport assessment used was the West Harlow VISUM model forecast year 2041 which represented the end of the local plan period and used to rank sites in terms of their sustainability. This is a more detailed assessment to understand the	The Council recognise the outstanding issues and welcome the continued efforts from National Highways to work with the Council to resolve these outstanding matters prior to the EiP. The detailed response to the transport matters will be addressed through a revised SoCG in time for the EiP.



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					scale and nature of the impacts and to model the local impacts on the A120 for example. They attach their latest SoCG setting out their current position and are optimistic that a lot of the issues will be resolved before the Examination, through continual engagement. They confirm their commitment to continue to work with the Council in a collaborative and constructive manor to support the progression of the plan, in particular to develop a greater understanding of the impact of the proposed development upon the A12 and the required mitigation which should go into the IDP.	
ANON-QNH5-RDTP-P	Ryan Walker	On behalf of an Organisation	abrdn Investments and Mulberry Strategic Land Limited	Employment site selection - Taylors Farm	The allocation of the Land North of Taylors Farm, Takeley Street is not justified by the evidence base, and does not meet the qualitative or quantitative need identified in the evidence base.	The allocation of employment sites is addressed in the Employment Site Selection Topic Paper. The Site Selection Topic Paper states concludes "Another 18ha allocation at Takeley Street (Takeley 005 EMP) is proposed which leads to a technical oversupply against the requirement, but it is considered pragmatic to plan on the basis for some headroom should any of the industrial allocations not come forward in full or be delayed, plus allowing for some flexible employment floorspace on the site to respond to market conditions and potentially deliver office floorspace to meet the residual office need in the District. The Takeley Street site is well located to the M11 and Stansted with no significant transport constraints identified that would preclude development".
ANON-QNH5-RDRZ-X	Takeley Street Resident s Group	On behalf of an Organisation	Takeley Street Residents Group	Evidence Base - Transport	<p>Takeley Street residents Group highlights the following issues</p> <p>Misrepresentation in Appendix 8: Safeguarded Land for Transport Uses in relation to Core Policies 8 and 14. The “safeguarded transport land” for longer term expansion of the secondary school at Takeley is in fact in Saffron Walden which is 14 miles away.</p> <p>Misrepresentation in Appendix 8 in relation to Core Policies 8 and 14. The “land safeguarded for a public transport and active travel connection between the Takeley allocation and Stansted Airport, Takeley” ends in a parcel of land located within the MAG airport boundary.</p> <p>Misrepresentation in Appendix 8 in relation to Core Policies 8 and 14: The parcel of land “Safeguarded for transport use (A120 Access)” is unsustainable due to 3 clear reasons:</p> <ul style="list-style-type: none"> <li>• Area is located within the current and proposed CPZ.</li> <li>• Area is located within a high-risk flood area with potential for loss of life.</li> <li>• There is no direct access available to the A120, and unlikely to be so in the future.</li> </ul> <p>Misrepresentation in Appendix 8 in relation to Core Policies 8 and 14. “Land safeguarded for mobility hub uses” is incorrectly drawn on the map.</p> <p>Incorrect maps shown within the ‘Multi-modal viability study for the A120 corridor in Uttlesford’ for Takeley EMP005. Page 14 Figure 3.2 &amp; Page 19 Figure 4.1: Both maps show an incorrect boundary for Land North of Takeley Street. Page 31, Section 5.1 states: “Crossing facilities and new cycle and footpaths would ..... no pedestrian and cycle facilities are currently provided at this location”. This is unsound following the MAG response at Regulation 18. UDC claims to use data from the Census 2011 for Uttlesford, when in fact they have used the data from the TRICS national database.</p> <p>The A120 corridor assessment*, page 14, Table 2-2 has the following “Proposed Interventions in Takeley”: Public Transport: PT.02. New bus</p>	<p>The transport evidence base prepared in support of the emerging Uttlesford Local Plan forms a robust and detailed analysis of the current and forecast future performance of the transport network across the district and beyond. It provides a proportionate analysis of future demand that will be placed on the network due to Local Plan development, and the interventions required to mitigate the impacts on local communities. The evidence is underpinned by the development of two transport models which were built in accordance with Department for Transport (DfT) TAG guidance, whilst also meeting the requirements of the National Planning Policy Framework (NPPF).</p> <p>The Council disputes the suggested figures put forward regarding HGV use on the B1256. The Local plan transport assessments have followed the prescribed methodology and applied the number of expected HGV trips associated with the uses classes identified in the proposed employment allocation.</p> <p>The transport evidence which supports the Local Plan demonstrates that the Taylors Farm strategic site can be delivered with the primary access being onto the B1256 with trips travelling westward towards the M11 J8. Some mitigation measures are required in order to deliver this access onto the B1256. Development proposals will be required to assess the transport impacts in further detail and submit a transport assessment. The transport assessment that accompanies future planning applications will likely assess whether the safeguarded route between Taylors Farm and the A120 is required to deliver the site. Any future work on the delivery of this route will need to consider flood risk and a range of other environment issues and constraints. The sustainable transport links in Takeley will provide enhanced connections to the Airport for residents of the new developments and the existing communities between key settlements and service. The improved connectivity and services will provide direct public transport link to the multi-modal transport interchange at the Airport and a safe and direct active travel route between the B1256 and Parsonage Road. The Council is satisfied that the evidential conclusions are correct and the approach set out in the Plan is appropriate and proportionate, however, detailed discussions on service provision and the level of developer contributions towards the enhancement of public transport is a detailed matter that will be considered at the planning application stage.</p> <p>The Council agrees that there are no further schemes identified for J8 M11 beyond those associated with the permitted planning consents at the Airport.</p> <p>The Council will continue to work with STAL on active travel and sustainable transport connections taking into account the operation complexities at the Airport and the exact nature of the active travel route and interventions required will be agreed with Essex Highways as part of the development management process. The comprehensive suite of transport evidence also includes a consideration of sustainable transport in the</p>

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					<p>service between the development site and Stansted Airport utilising a sustainable transport corridor. This proposed intervention is unlikely. The A120 corridor assessment*, page 42 Table 6-2 recommended interventions and indicative costs total £11,500,000 with the sustainability of these costs questioned.</p> <p>The A120 corridor assessment*, Page 68 details the impact of the new housing allowance upon a “new access road” to be built within the proposed 1506 residential homes site in Takeley. This number of additional vehicles per day only includes the residential impact and does not include the impact of the 2 x 18ha employments sites included within Takeley. This additional 1700 traffic flow in one hour will have to join Parsonage Road or the B1256 causing unsustainable traffic. 1,773 OGV movements per day in the Takeley EMP005 site, is not obvious within the ‘Multi-modal viability study for the A120 corridor in Uttlesford’. UDC’s claim of no expected change in number HGV Flows in Takeley is a misrepresentation of data. The assumptions made are incorrect.</p> <p>An increase of HGV movements will occur at the proposed allocation at the Takeley North industrial site on the B1256 (Takeley EMP005), with the potential of 1,773 additional total HGV movements per day. The Transport evidence base is incorrect. The only road that exists is the B1256 which is at capacity. Takeley Street Residents group have undertaken their own calculations using UDC data from the TRICS database. UDC’s own data suggests there will be an additional 1,773 HGV movements per day at the Takeley North industrial site (Takeley EMP005), yet the UDC report claims that HGV movement numbers on the B1256 are not expected to change. The mitigation plans to route traffic away from the B1256 are not possible.</p> <p>“Sustainable Transport Local Plan” falsely refers to Highway Mitigation and junction improvements and M11 Junction 8. The Transport Evidence document* specifies that “there is clearly a need for a long-term solution to address delays which occur at M11 J8” and that “local plan development sites would contribute a commensurate amount towards the cost of the scheme”. There are 2 major errors in the above statements.</p> <ul style="list-style-type: none"> <li>• M11 J8 upgrades are not forthcoming (Reference: 2 Essex FOI).</li> <li>• There are no further M11 J8 upgrade plans within the Essex Highways Roadmap. (Reference: 2 Essex FOI).</li> </ul> <p>Detailed discussions will also have to occur with MAG to determine whether they will consider signalised crossings of road infrastructure at the airport, on their private maintained roads.</p>	<p>District including a full assessment of sustainable transport opportunities, a Local Cycling and walking Infrastructure Plan, the potential for public transport enhancements in the A120 corridor and consideration of how ‘Shared Transport’ schemes can be delivered on large scale development sites.</p>
ANON-QNH5-RDRZ-X	Takeley Street Resident s Group	On behalf of an Organisation	Takeley Street Residents Group	Evidence unsound	<p>The evidence base for Transport and Travel is unsound (see our Document C Transport). The base year for the modelling is 2021 which was during the Covid Pandemic. Air travel was restricted and the high level of homeworking impacted traffic flows. Therefore, the data doesn’t reflect normal patterns. The evidence provided by UDC for Sustainable Travel is unsound and likely to be an overestimate. The study cites an estimated 15% shift away from car use and there appears to be no evidence base or testing as to what would happen should this not be achieved. The potential of junction 9a of the M11(Stumps Cross) is not</p>	<p>The transport evidence base prepared in support of the emerging Uttlesford Local Plan forms a robust and detailed analysis of the current and forecast future performance of the transport network across the district and beyond. It provides a proportionate analysis of future demand that will be placed on the network due to Local Plan development, and the interventions required to mitigate the impacts on local communities. The evidence is under pinned by the development of two transport models which were built in accordance with Department for Transport (DfT) TAG guidance, whilst also meeting the requirements of the National Planning Policy Framework (NPPF).</p> <p>The Council is satisfied that the transport assessment evidence and survey data that underpins the assessment was undertaken in line with the relevant guidelines issued at the time. Caution was taken when</p>

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ANON-QNH5-RD19-V	Giles Ward	On behalf of an Organisation	Environment Agency	Flood Risk - Sequential Test	<p>The Environment Agency states that the draft Local Plan is considered to be unsound as there is no evidence of the flood risk Sequential Test having been applied to the proposed site allocations, and as a result there is insufficient information to demonstrate that the Local Plan is consistent with national planning policy. The EA also notes that there is no evidence of the Council having taken into account the findings of the Level 1 SFRA in deciding which sites to take forward in the Local Plan Update, and that the Sustainability Appraisal does not contain any reference to the results of the Sequential Test. Consequently, the Environment Agency recommends that evidence of the application of the Sequential Test is submitted as part of this Local Plan stage and has offered to assist the Council in applying the Sequential Test.</p>	<p>The Council welcomes the EA's offer of assistance with regard to the Sequential Test and agrees to work closely with the EA on the most appropriate way of demonstrating the application of the test. It should be noted that the majority of proposed allocations in the Local Plan are at low risk of flooding from all sources, and that for those sites which contain areas of higher risk of fluvial or surface water flooding the indicative development frameworks have been designed to avoid development in the areas at risk.</p>



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ANON-QNH5-RD1D-7	Ian Butcher	On behalf of an Organisation	Artisan New Homes Ltd	Flood Risk - Sequential Test	The respondent suggests that their client's site should be classified as deliverable within the first 5 years of the plan period and that it should be classified as suitable due to its allocation in the Little Chesterford Neighbourhood Plan and the Regulation 18 HELAA assessment of the site. They also note the presence of the Neighbourhood Plan allocation not referenced in the HELAA and request an update to this site information.	The resubmission of the site is noted. Whilst the Council acknowledges that the respondent's site is subject to pre-planning discussions, the Local Plan period runs from 2021 and in the absence of full planning permission it is therefore not considered to be realistically deliverable within the first 5 years of the plan period. The Council does acknowledge the error with regard to the site's allocation in the Little Chesterford Neighbourhood Plan, and will correct this oversight in the next HELAA update, but as explained in the HELAA methodology the Regulation 19 HELAA differs from the Regulation 18 version in that it takes into account each site's accordance with the emerging spatial strategy. In this case, the site is located in the open countryside away from the settlements in the upper three tiers of the settlement hierarchy, and allocation of the site would not be in accordance with the spatial strategy.
ANON-QNH5-RD46-V	David Corke	On behalf of an Organisation	Walden Countryside	Habitat Regulations Assessment (HRA)	Comment refers to a consultant's report which includes details of SACs outside District, which the Council has no responsibility for.	It is believed that the comment refers to the Habitat Regulations Assessment (HRA). The HRA does not relate to the Council's responsibility for the management of Habitats sites, but rather it provides an assessment of whether the policies in the Local Plan could lead to adverse effects on Habitats sites of international importance, including those which lie outside the District such as the SACs listed in the HRA report. The Appropriate Assessment is a statutory requirement and is therefore an essential component of the evidence base.
ANON-QNH5-RD36-U	Kate Sutton	On behalf of an Organisation	AM Planning on behalf of Richstone Procurement Ltd	HELAA - Clavering 014 RES	The respondent has submitted additional supporting information for a site in Clavering which was assessed through the HELAA. The supporting information addresses several of the criteria for which the site received an amber rating in the HELAA assessment, including landscape character, flood risk, access and sustainability.	The supporting information is noted and will be considered for a future update of the HELAA if the site remains available. It should be noted that no strategic allocations are made in Clavering, and non-strategic allocations will be made through a Neighbourhood plan, as set out in Core Policy 19.
ANON-QNH5-RDC6-B	Edward Green	Individual / member of the public		HELAA - Clavering 019 RES	The comment identifies inaccuracies in the conclusions for HELAA site Clavering 019 RES with regard to flood risk, the historic environment and achievability and seeks its removal from the HELAA.	The HELAA assesses all known sites in the District, identified using the sources noted in Stage 1 of the methodology. The site in question was submitted for consideration and was therefore assessed according to the methodology and with regard to the supporting information provided to support the site submission. As noted in the methodology, developable site areas were adjusted to take into account insurmountable constraints, including areas within Flood Zones 2 and 3. In this case, the part of the site which is at risk of fluvial flooding corresponds with the area of surface water flood risk, and the developable area has been reduced as a result but the Council agrees that the site proforma should be amended to change this to an amber rating. The HELAA clearly identifies constraints which may require mitigation should development occur, including those linked to its proximity to heritage assets and its function as an important open space within the Conservation Area. These constraints are not considered to be insurmountable, and no constraints have been identified which would render the site unsuitable or unachievable for development.
ANON-QNH5-RD34-S	Adam Davies	On behalf of an Organisation	The Davies Family	HELAA - Clavering 021 RES	The respondent suggests that there are errors in the assessment of Clavering 021 RES in relation to the its existing use and access, and questions the appropriateness of applying the settlement hierarchy to the suitability conclusions.	The Council acknowledges that the site has been incorrectly categorised as agricultural land in the HELAA database, and will ensure that this is corrected in a future HELAA. The HELAA methodology explains the use of the amber and red categories for highways access. All sites with existing access to the road network have been categorised as amber, on the basis that the suitability of the access to serve any proposed development has not been assessed in detail and further work, including consultation with the highways authority, would be required to demonstrate suitability. The site in question is located some distance from the main settlement of Clavering, and there is no accessible pedestrian connection to the village in the absence of a footway. The site is effectively in open countryside, and whilst development of the previously developed part of the site may be permissible through the development management system, it would not be appropriate for allocation in the Local Plan.
ANON-QNH5-RDYX-3	Lynette Young	On behalf of an Organisation	Clavering Parish Council	HELAA - Clavering site conclusions	The comment seeks amendments to the suitability conclusions for the following sites based on recent planning decisions: - Clavering 008 RES - Clavering 010 RES - Clavering 011 RES - Clavering 013 RES - Clavering 014 RES - Clavering 015 RES	Whilst there have been recent refusals for applications on two HELAA sites identified in the representation, other nearby schemes have been granted planning permission within the last 5 years, indicating that development in this part of Clavering can be sustainable. The Council does therefore not consider that all sites in this location should be viewed as unsuitable for development. The Local Plan heritage assessment is focused on the proposed strategic allocations and is not a District-wide assessment. However, the HELAA identifies the presence of heritage assets in both the suitability conclusions and assessment criteria and these should be considered further when sites are proposed for development in accordance with Core Policies 61 to 65. All sites have been assessed using the available information, and site boundaries may not always align with

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					The comment also suggests that a heritage assessment be carried out for Clavering 019 RES and states that the site boundary of Clavering 009 RES is inaccurate.	basemaps depending on the format used in the original submission. Whilst there is no apparent discrepancy on the boundary of Clavering 009 RES, the eastern boundary is overlaid with areas of fluvial flood risk on the settlement suitability map, which may create the appearance that the site does not abut the road. The site proforma (Appendix 1) provides a clearer outline of the site boundary.
ANON-QNH5-RDNM-D	Graham Mott	On behalf of an Organisation	Elsenham Parish Council	HELAA - Maps	Elsenham Parish Council states that the map of Elsenham 008 RES is incorrect and does not reflect two planning permissions on the site.	The HELAA assesses sites according to the information submitted to the Council by landowners, site promoters and other third parties. Whilst a site may be subject to a planning application, the boundary as submitted for consideration in the HELAA may not align with the boundary of the site for which planning permission has been sought. The assessment of the site in question is based on the information provided to the Council, and the landowner has not identified any discrepancy in the boundary that would result in a change to the assessment or the associated mapping.
ANON-QNH5-RDNS-K	Andy Stevens	Individual / member of the public	ASP on behalf of Mr John Noble	HELAA - Methodology	The comment notes the conclusions of the HELAA for sites in Clavering and queries whether the emerging Local Plan policies, including the 20% Biodiversity Net Gain requirement, and known environmental and heritage constraints were considered when indicative site capacity was calculated.	Stage 2 of the HELAA methodology sets out the approach to calculating indicative capacity for residential and employment sites, including the consideration of insurmountable constraints and their impact on the gross site area. Where constraints are not insurmountable but may require mitigation, this has been highlighted in the relevant suitability criteria and in the suitability conclusions but no further adjustment has been made to indicative capacities. The HELAA is intended to provide a consistent method for comparison of site capacities rather than a detailed site-by-site calculation which is best addressed at the design and planning application stages. Whilst the emerging settlement hierarchy and the Plan's approach to development in the Green Belt have informed the HELAA conclusions, the impact of individual policies, including those related to open space and habitat provision, has not been considered in the calculation of site capacity since the effect on developable area is likely to vary depending on site design. However, the density matrices do include ratios which the need for greater on-site provision of infrastructure and open space on larger sites.
ANON-QNH5-RDEG-X	Michelle Cayley	On behalf of an Organisation	Landmatch Solutions on behalf of Tommy Gaunt and Faye Dickinson	HELAA - New site submission (open countryside)	Submission of a site in Debden Parish not previously assessed through HELAA, with call for sites form and location plan.	The site submission is noted. The base date of the HELAA is 1 April 2024 and the site was submitted for consideration after this date. It has therefore not been assessed or considered for inclusion in the Local Plan and will be considered through a future HELAA update. However, it is located in the open countryside away from the settlements in the upper three tiers of the settlement hierarchy, and allocation of the site would not be in accordance with the spatial strategy.
ANON-QNH5-RDM4-K	James Salmon	Individual / member of the public		HELAA - Resubmission (Green Belt)	Resubmission/promotions received for the following HELAA Sites in the Green Belt: - HatfieldH 012 RES - Stansted 003 RES	The sites were considered through the HELAA and discounted due to their location in the Green Belt. As there is no shortage of non-Green Belt sites available for development across the district, it is not thought there are any 'exceptional circumstances' to justify development in the Green Belt. Allocation of the site would not be in accordance with the spatial strategy.
ANON-QNH5-RDNA-1	Peter Biggs	On behalf of an Organisation	Luxus Homes Stoney Common Limited			
ANON-QNH5-RD3V-U	Rupert Kirby	On behalf of an Organisation	J F Kirby & Son	HELAA - Resubmission (Key Settlement)	Resubmission of HELAA site GtDunmow 019 MIX, suggesting that the HELAA should reflect recent planning decisions and that there should be a greater distinction in classifications in the HELAA to allow for more nuanced assessment of the sites.	The resubmission of the site is noted. The HELAA considers the larger site which was submitted for consideration as part of the Regulation 18 consultation and its conclusions take into account the information submitted at that stage. The HELAA methodology provides an explanation for each of the colour-coded classifications, and more detailed consideration of the relative merits of each site was conducted through the site selection process, as detailed in the site selection topic paper. The base date of the HELAA is 1 April 2024, and the assessment considers commitments up to 31 March 2024. Extant permissions are reflected in the assessment of this site in the proforma at Appendix 1 of the HELAA and the settlement maps at Appendix 2, but any live applications which are undecided have not been captured.
ANON-QNH5-RD3F-B	Eleanor Kibblewhite	On behalf of an Organisation	Bellway Homes	HELAA - Resubmission (Local Rural Centre)	Resubmission of HELAA site HatfieldBO 004 RES, noting that a smaller area is proposed for development and suggesting that the site should be reclassified as being deliverable within the first 5 years of the plan period.	The HELAA has considered the entire site as submitted to the Call for Sites, and its conclusions are that the whole site is deliverable and not subject to any significant constraints. The Council notes that a smaller area is being promoted for development, and acknowledges that this could be delivered more quickly than the larger 18.71ha site. Whilst the Council acknowledges that the site is subject to a live hybrid application submitted in September 2024, the Local Plan period runs from 2021 and in the absence of full planning permission it is therefore not considered to be realistically deliverable within the first 5 years of the plan period.

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ANON-QNH5-RDAY-C	Samuel Bampton	On behalf of an Organisation	Pelham Structures Ltd	HELAA - Resubmission (open countryside)	Resubmission of HELAA Site Ugley 003 MIX	The resubmission of the site is noted. However, it is located in the open countryside away from the settlements in the upper three tiers of the settlement hierarchy, and allocation of the site would not be in accordance with the spatial strategy.
ANON-QNH5-RDE3-A	Michelle Cayley	On behalf of an Organisation	Landmatch Solutions on behalf of LAND & COUNTY DEVELOPMENT LTD	HELAA - Resubmission (Smaller Village)	Resubmission of call for sites form for HELAA Site SwardsEnd 002 RES	The resubmission of the site is noted. The site was considered through the HELAA and discounted due to its location adjacent to a Smaller Village outside the upper three tiers of the settlement hierarchy. The allocation of the site would not be in accordance with the spatial strategy.
ANON-QNH5-RDRR-P	Victoria Bennion	On behalf of an Organisation	Rapleys on behalf of Pegasi	HELAA Resubmission	Resubmission of a site at Land at Belcham's Lane and Maces Farm, with call for sites form and location plan. QuendonR 004 RES and QuendonR 007 EMP	The resubmission of the site is noted. The site was considered through the HELAA and discounted due to its location adjacent to a Smaller Village outside the upper three tiers of the settlement hierarchy. The allocation of the site would not be in accordance with the spatial strategy.
ANON-QNH5-RD33-R	Michelle Cayley Elsenham	On behalf of an Organisation	Go Homes Family	HELAA Submission	Submission of a site at Elsenham in Henham Parish not previously assessed through HELAA, with call for sites form and location plan.	The site submission is noted. The base date of the HELAA is 1 April 2024 and the site was submitted for consideration after this date. It has therefore not been assessed or considered for inclusion in the Local Plan and will be considered through a future HELAA update. However, it is located in the open countryside away from the settlements in the upper three tiers of the settlement hierarchy, and allocation of the site would not be in accordance with the spatial strategy.
ANON-QNH5-RDWB-B	William Tracey	Individual / member of the public	Landsec	Housing Site Selection Topic Paper	Representation objecting to the conclusions of the Site Selection Topic Paper for Great Dunmow 009 RES The Broadway, Church End, and the subsequent allocation in the plan. Objections are made on Transport grounds (inadequate Road Infrastructure/ Weak Bridge, Bus & Active Travel routes); Highway safety; Heritage; Landscape and Flood Risk grounds	The Site Selection Topic Paper conclusions for the site are that it is a 'clear preferred site option' and it is allocated in the plan, with an accompanying site development template setting out the infrastructure and design requirements and mitigation necessary to support the delivery of the site. The Conclusions state "The site is adjacent to the built-up area of Church End. Development of the site would deliver a strategic urban extension to Church End and is considered to relate suitably well to Great Dunmow. It is not subject to any 'showstopper' constraints and has the potential to deliver a sustainable and proportionate extension to the existing built-up area. It is in a relatively sustainable location in relation to walking and cycling to key destinations within the town centre through appropriate enhancements. Access is available onto the adjacent highway network. Development impacts on the existing highways network could be mitigated through reducing the development capacity to approximately 900 dwellings and improvements via B1057 eastbound through the town centre. The site is of moderate to high landscape sensitivity to residential development. The site is within the setting of a number of designated heritage assets including the setting of Church End Conservation Area, St Mary's Church, Crouches, and Diamond Cottage which would need to be considered. Part of the site is in Flood Zone 3. The site contains or is adjacent to a number of woodlands identified as priority habitats or ancient woodland, but these could be positively incorporated through sensitive design. The assessment has considered the planning history of the site including UTT/19/1802/OP. Owing to the size of the site, it is considered that the potential impacts on the rural landscape and heritage assets have a reasonable prospect to be mitigated through a strengthened landscape framework and sensitive design." The site allocation is considered sound and supported by robust evidence.
ANON-QNH5-RD36-U	Kate Sutton	On behalf of an Organisation	AM Planning on behalf of Richstone Procurement Ltd	Housing Site Selection Topic Paper - Clavering 014 RES	Omission site promotion for Clavering 014 RES, claiming that the Local Plan should allocate the site rather than the Neighbourhood Plan	As Clavering is a Larger Village and has a housing requirement set in Core Policy 19, the allocation of this site is a matter for the Neighbourhood Plan process to address. In line with Core Policy 19, if a Neighbourhood Plan has not been prepared within two years of plan adoption providing for the housing requirement to be met in full, Uttlesford District Council will make the allocations instead, either through a DPD or a Local Plan Review.
ANON-QNH5-RDDC-S	DAVID & PATRICIA BEEDLE	Individual / member of the public		Housing Site Selection Topic Paper - Great Dunmow	Commentary is provided criticising the site selection process at Great Dunmow. The Land East of Highwood Quarry permission is suggested to be a reason to reduce the development apportionment at Great Dunmow. Sites 017 and 008 should have been subject to a full Sustainability Appraisal. The road access and capacity of St Edmunds Lane is unsuitable for Site 009 RES	The Site Selection Topic Paper explains the reasoning for the rejection of sites in Great Dunmow, and which sites were taken forward to the Sustainability Appraisal stage to be considered through an assessment of 'reasonable alternatives'. The Land East of Highwood Quarry permission granted between Regulation 18 and Regulation 19 has reduced the residual housing need to be planned for; however Great Dunmow remains at the top of the settlement hierarchy and it would be inappropriate to simply reduce the housing figure solely at Great Dunmow. Sites 017 and 008 were taken forwards as 'Clear Preferred Site Option' and 'Marginal



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						Preferred Site Option' respectively and subject to Sustainability Appraisal, as outlined in Table 5.2 of the Sustainability Appraisal.
ANON-QNH5-RDA7-A	Steven Butler (agent)	On behalf of an Organisation	Clare College, Cambridge	Housing Site Selection Topic Paper - GtChesterford009RES	Omission site promotion stating that the land is still available and that the reasons for not allocating the site (notably the access via Greater Cambridge and requiring an allocation in that plan) are able to be overcome through joint working with both UDC and Greater Cambridge Shared Planning	The availability of the site is noted and the allocation of the site will be considered jointly by UDC and GCSP in the next round of plan-making
ANON-QNH5-RD3F-B	Eleanor Kibblewhite	On behalf of an Organisation	Bellway Homes	Housing Site Selection Topic Paper - HatfieldBO 004 RES	Omission site promotion for HatfieldBO 004 RES. A hybrid application has been submitted. The reasons for not allocating the site are objected to. The rep claims inconsistency between the HELAA and the site selection process	The site selection process builds on the HELAA evidence base as a starting point, which identifies a long list of potentially suitable, available and achievable sites which could become allocations in the plan. The site selection process outlines the multi-stage process through which sites have been discounted, taking into account the relative merits and harms of individual sites. In the case of HatfieldBO 004 RES the site selection process identifies better performing sites in the area, stating that "The site is opposite the main built-up area of Takeley, with Flitch Way acting as a clear and defining physical boundary to development. It also intersects with the Local Wildlife Site of Flitch Way, with potential impacts on identified priority habitats. The site is subject to significant landscape and heritage sensitivities, including potential impact on the setting of the Grade II listed farmhouse Bonningtons. The site is in close proximity to Hatfield Forest and falls within the Hatfield Forest Zone of Influence." The site selection process, and allocations in the submitted local plan, are considered sound having been justified via a robust HELAA, site selection methodology, and Sustainability Appraisal process.
ANON-QNH5-RDRA-5	Robert Barber	On behalf of an Organisation	Pegasus Group on behalf of Bloor Homes Eastern	Housing Site Selection Topic Paper - Land East of High Street, Stansted Mountfitchet Allocation	Representation providing further information in support of the allocation at Land East of High Street, Stansted Mountfitchet.	The information provided supports the Council's decision to allocate the site, as set out in the Housing Site Selection Topic Paper and Sustainability Appraisal, and supports the Council's view regarding the deliverability of the site over the plan period. Any changes to site-specific policy requirements, or the site development templates, will be a matter for further negotiation and discussion during the examination process
ANON-QNH5-RDRA-5	Robert Barber	On behalf of an Organisation	Pegasus Group on behalf of Bloor Homes Eastern	Housing Site Selection Topic Paper - Land North of Walpole Meadows Allocation	Representation providing further information in support of the allocation at Land North of Walpole Meadows, Stansted Mountfitchet.	The information provided supports the Council's decision to allocate the site, as set out in the Housing Site Selection Topic Paper and Sustainability Appraisal, and supports the Council's view regarding the deliverability of the site over the plan period. Any changes to site-specific policy requirements, or the site development templates, will be a matter for further negotiation and discussion during the examination process
ANON-QNH5-RD3A-6	Timothy Trembath	Individual / member of the public		Housing Site Selection Topic Paper - LtEaston 006 RES	Omission site promotion for LtEaston 006 RES. The reasons for not allocating the site are objected to. The rep claims that planning permissions granted for development adjacent to the site (notably Land East of Highwood Quarry) mean that it should be allocated for development in the plan.	The site was scored as a Category B HELAA site but inadvertently not taken forward further through the site selection process as it was erroneously understood that the site was within the Land East of Highwood Quarry boundary. The site can be considered as part of the next plan process
ANON-QNH5-RDNM-D	Graham Mott	On behalf of an Organisation	Elsenham Parish Council	Housing Site Selection Topic Paper - Methodology (Highway Network)	The site selection methodology is not appropriate with regard to highways impacts in Elsenham and Stansted Mountfitchet. To understand the scale of the issue first-hand experience is required in Elsenham in peak times.	The transport evidence base prepared in support of the emerging Uttlesford Local Plan forms a robust and detailed analysis of the current and forecast future performance of the transport network across the district and beyond. It provides a proportionate analysis of future demand that will be placed on the network due to Local Plan development, and the interventions required to mitigate the impacts on local communities. The evidence is underpinned by the development of two transport models which were built in accordance with Department for Transport (DfT) TAG guidance, whilst also meeting the requirements of the National Planning Policy Framework (NPPF). The Council is satisfied that the transport assessment evidence and survey data that underpins the assessment was undertaken in line with the relevant guidelines issued at the time. Caution was taken when considering the modelling outputs from the baseline data, and comparisons were drawn with pre-COVID data.

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						To ensure a robust assessment, 2021 Base flows were factored up during the forecasting to account for this. The comprehensive suite of transport evidence also includes a consideration of sustainable transport in the District including a full assessment of sustainable transport opportunities, a Local Cycling and walking Infrastructure Plan, the potential for public transport enhancements in the A120 corridor and consideration of how ‘Shared Transport’ schemes can be delivered on large scale development sites.
ANON-QNH5-RDNM-D	Graham Mott	On behalf of an Organisation	Elsenham Parish Council	Housing Site Selection Topic Paper - Ugley 004 RES	Elsenham Parish Council notes that Ugley 004 RES is split between the parishes of Henham and Ugley.	The Housing Site Selection Topic Paper adopts a settlement-based approach. Following this methodology, the Council's assessment of Ugley 004 RES highlights that the site is adjacent to the settlement of Elsenham. It is noted that the site spans the parishes of Ugley and Henham which will be clarified through a minor amendment to the Housing Site Selection Topic Paper.
ANON-QNH5-RDAF-S	Adam Bell	On behalf of an Organisation	Bennett Homes	Housing Trajectory - Site Specific Timings	Comment stating that the Land to the West of Buttleys Lane, Great Dunmow reference UTT/19/2354/OP will be delivered more quickly than estimated in the Housing Trajectory	The comment confirming faster delivery is noted, however at the time the housing trajectory was prepared the site had outline approval only and does not meet the NPPF definition of deliverable. A cautious assumption to the delivery of this site has been taken. The AMR and housing trajectory will be updated on an annual basis and revised where appropriate as reserved matters are approved and delivery commences.
ANON-QNH5-RD3A-6	Timothy Trembat h	Individual / member of the public		Housing Trajectory - Spatial Strategy	Comment concerned that the spatial strategy and inclusion of strategic sites will not contribute towards a five-year housing land supply in the early years of the plan period; and that additional smaller site allocations should be made to remedy this. Furthermore it is suggested that the non-strategic allocations at Newport and the Larger Villages will delay delivery.	The published Housing Trajectory calculates a five-year housing land supply position at estimated plan adoption of 5.35 years. Appendix 1 to the Housing Trajectory shows that delivery is forecast to increase from plan adoption until 2030/31, at which point the new strategic allocations are due to start delivering, exceeding the annual housing requirement figure for the plan every year until 2036/37. Additionally Appendix 1 shows that the non-strategic allocations at Newport and the Larger Villages are expected to start delivering in 2033/34 onwards, and the Council is not reliant on their early delivery to achieve a five-year housing land supply. The published housing trajectory demonstrates that the Council has a balanced portfolio of sites that will deliver consistently over the plan period, and with 'headroom' in the supply over and above the requirement this will ensure that delivery takes place to meet needs in full.
ANON-QNH5-RD3M-J	Adam Davies	On behalf of an Organisation	Ceres Property on behalf of Richard Martin M Scott Properties Ltd			
ANON-QNH5-RDAD-Q	Marie Jasper	On behalf of an Organisation	Landsec	IDP - Easton Park Garden Community	Comment noting that the reference in the IDP to a new Country Park in Appendix C would comprise part of the wider Garden Community proposal over the longer term. Suggestion from the landowner that row T2 of the Infrastructure Schedule refers to "a new bus service from the strategic allocation, linking to the town centre and Easton Park". For clarity, it is requested that the IDP is amended to “a new bus service from the strategic allocation, linking to the town centre and future development at Easton Park”. Additionally, the IDP at Table B.1 refers to "Land South of Highwood Quarry" when it should be "Land South of A120 North of Stortford Road"	The Country Park at Easton Park is something that the Council is keen to deliver in the longer-term, however it is noted that it is not a specific proposal in the submitted Local Plan. The IDP seeks to keep the Country Park on the list of infrastructure to inform any update or review to the Local Plan. Regarding T2, the Council considers that no change is required as the text captures the existing Land East of Highwood Quarry scheme and also any other development that may come forward at the site over the plan period. The point regarding the naming of the site in Table B.1 is noted and will be amended in an errata.
ANON-QNH5-RD1W-T	Zhanine Smith	On behalf of an Organisation	Essex County Council	IDP - Essex County Council	Essex County Council seeks amendments and clarifications to the IDP and infrastructure schedule in relation to education and transport/highways matters. These clarifications relate to the following issues: <ul style="list-style-type: none"> <li>- EYCC provision at Saffron Walden</li> <li>- Primary provision at Great Dunmow</li> <li>- Expansion of County High (Saffron Walden)</li> <li>- Expansion of Joyce Frankland (Newport)</li> <li>- Size of Takeley secondary school</li> <li>- Expansion of Newport Primary as a result of Local Plan growth</li> <li>- Certainty over funding sources for transport projects</li> <li>- Allocation of funding to specific sites</li> <li>- Timetable for delivery of transport interventions</li> <li>- Underestimated costs for transport schemes</li> <li>- Clarification over delivery body for transport schemes</li> <li>- Lack of certainty over deliverability of the infrastructure projects</li> </ul>	The Council notes ECC's detailed representation on the IDP which sits alongside its comprehensive review of the Local Plan itself. The Council will continue to engage with ECC over the matters raised in the representation throughout the examination in public and will consider whether amendments are required to the information within the IDP and infrastructure schedule. The Council's consultants engaged with ECC through the IDP process to ascertain the costs and potential funding sources for those projects related to ECC's responsibilities and the infrastructure schedule reflects the outcome of that engagement. However, the Council recognises that infrastructure requirements do change, as do the costs of projects, and the IDP will be updated to reflect the outcome of the examination and the content of the Local Plan once adopted.



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					The County Council seeks further discussions with the Council to confirm and clarify aspects of the IDP.	
ANON-QNH5-RD3Z-Y	James Lawson	On behalf of an Organisation	Essex Police	IDP - Essex Police	Essex Police note the additional policing resources that would be required as a result of the Local Plan growth, and have requested a series of changes to the IDP to reflect specific infrastructure requirements at the main settlements in the Local Plan. In the representation they set out costs for this infrastructure and funding sources.	The Council notes the detailed representation provided by Essex Police. As part of the process of developing the IDP, the Council's consultants consulted with infrastructure providers including Essex Police to determine whether the infrastructure requirements they had identified at the Regulation 18 stage (both through the IDP engagement and their representations on the Regulation 18 Local Plan) remained relevant after consideration of the updated growth strategy in the Regulation 19 plan. The detailed requirements contained in Essex Police's representation were not identified at this point, and therefore the IDP and its infrastructure schedule were prepared on the basis of the information provided previously by the Police. Core Policy 5 sets out that proportionate contributions will be sought towards infrastructure, and this includes contributions towards emergency services provision. The Council is content that where development leads to additional pressure on policing resources an appropriate contribution will be sought from that development. However, the Council also recognises that infrastructure requirements are not fixed and will continue to engage with Essex Police to determine what new infrastructure is needed and what proportion of the costs can reasonably be attributed to the development proposed in the Local Plan.
ANON-QNH5-RD1X-U	Rachael Donovan	On behalf of an Organisation	NHS Hertfordshire and West Essex	IDP - NHS	NHS Hertfordshire and West Essex has requested an amendment of the infrastructure category of "essential infrastructure" so that it includes healthcare, and recommend that all healthcare projects identified in the infrastructure schedule are reclassified as essential infrastructure. They also request factual corrections to the IDP in relation to specific healthcare facilities within and outside the District and the sources of funding for identified projects.	The Council recognises the importance of healthcare provision, and this is reflected in the infrastructure schedule which classifies the majority of healthcare interventions as essential infrastructure. Where specific facilities are required on the strategic allocations, these are set out in the site development templates, and all qualifying development is expected to make proportionate contributions towards healthcare provision in accordance with the requirements of the IDP. This is reinforced by Core Policy 5. The Council acknowledges that the IDP will require an update when the plan is adopted to reflect any amendments during the Examination in Public, and will consider making factual corrections and including updated funding information at that stage. The Council will continue to engage with the NHS and other infrastructure providers to ensure that any IDP update accurately reflects the latest position on infrastructure requirements and funding.
ANON-QNH5-RDNV-P	Colum Fitzsimons	On behalf of an Organisation	Cambridgeshire County Council	Impacts on Cambridgeshire	<p>Cambridgeshire County Council welcomes the detailed discussions with Uttlesford District Council regarding transport modelling and evidence base used. Cambridgeshire County Council believes the information available is insufficient to determine detailed transport impacts in Cambridgeshire. In particular, the Saffron Walden model forecasting report is needed to form a full understanding of the situation. The initial comments on the model are:</p> <ul style="list-style-type: none"> <li>• Great Chesterford is in the Saffron Walden model but is close to the edge of the detailed modelled area.</li> <li>• The model is Highway only and uses a fixed trip matrix</li> <li>• Count data used was collected in October 2021 during the COVID pandemic and therefore the data may not give a true picture.</li> <li>• The impact of public transport and active travel schemes was assessed as follows: “As such, following the identification of the individual measures, agreement will be reached on an appropriate level of demand reduction to be applied manually in the model from the zones that would directly benefit from the proposed interventions. This would be based upon benchmarking with schemes elsewhere in the country where evidence is available. Using this methodology, sensitivity tests can also be undertaken which apply varying degrees of demand reduction to provide more confidence in the outputs of the exercise. This provides a straightforward approach where the demand response assumptions are explicitly given.” There is no detail as to how this was done, although this may be in the Forecasting Report.</li> <li>• The Junction Turning Count Data was collected in July 2021 during the</li> </ul>	The Council recognise the outstanding issues and welcome the continued efforts from Cambridgeshire County Council to work to resolve these outstanding matters prior to the EiP. The detailed response to the transport matters will be addressed through a revised SoCG in time for the EiP.

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					<p>COVID pandemic and therefore the data may not give a true picture. Chesterford Research Park - The Transport Evidence Topic Paper and Infrastructure Delivery Plan make no reference to the impact of additional jobs provision on travel patterns or the need for infrastructure. The County Council is supportive of measures to improve accessibility to the railway station at Greater Chesterford and wider improvements to sustainable transport near the research park. However, the County Council would expect to see detail of the transport impacts of additional employment at the Research Park. It would be useful to see data on mode share and expectations for modal shift to determine whether these are realistic and achievable, and whether there are any specific impacts on the transport network in Cambridgeshire that require mitigation.</p> <p>The County Council has undertaken considerable transport modelling for the approved and emerging local plans covering Cambridgeshire. All development in approved local plans covering Cambridgeshire have approved mitigation strategies to address their impacts on the transport network. It is not clear whether these mitigation measures have been accounted for in the transport modelling. The level of growth in Cambridge and South Cambridgeshire assumed in the Uttlesford modelling is in line with the adopted local plans for Cambridge and South Cambridgeshire rather than the emerging Greater Cambridge Local Plan but the reports do not state the cut-off point which would be useful to understand. The County Council would welcome discussions regarding the emerging Greater Cambridge Local Plan modelling.</p> <p>M11 junction 9a – proposed widening of southbound off slip - The County Council requires more detailed information on this proposal to inform its views. As the work progresses, the County Council would expect to see full carbon, transport and environmental assessments of any proposed road and junction improvements. The County Council has no funding available for such a scheme. The County Council would welcome the opportunity to be involved in discussions with Uttlesford Council and National Highways as work progresses.</p> <p>Royston to Granta Park Multi-modal Transport Study - The County Council is undertaking a multi-modal transport study of the Royston to Granta Park area. The study aims to encourage and facilitate sustainable modes of transport and reduce the number of car trips. The study is due to make recommendations on a package of measures for the area which merit further investigation. The study has assessed an all-movements junction at the M11/A11 and has found that this would not address the congestion, safety, severance, and environmental objectives of the study.</p>	
ANON-QNH5-RDZN-T	Fiona Martin	On behalf of an Organisation	Natural England	Infrastructure Delivery Plan - Country Park	Natural England notes the lack of green infrastructure across the District and suggests that the Local Plan does not address existing recreational pressure on Hatfield Forest. They request fast-track delivery of a new country park in the southern half of the District with the aim of this being deliverable within the first revision of the plan.	The Local Plan requires strategic sites allocations within the Hatfield Forest ZOI to deliver SANG to Natural England standard in order to mitigate the additional recreational pressure of new development on the NNR/SSSI. The Council is exploring options for a Country Park in the southern part of the District, and as set out in Paragraph 9.170 of the Local Plan will look at longer term opportunities through future Local Plans. The Council will continue to engage with Natural England and the National Trust as part of this process.

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ANON-QNH5-RDMM-C	Christine Griffin	On behalf of an Organisation	Newport Parish Council	Infrastructure Delivery Plan - Newport education	Comment identifying s106 contributions towards early years and primary education and healthcare from a consented scheme in Newport that are not reflected in the infrastructure schedule (IDP Appendix C). They request further information from Essex County Council to allow the relevant projects to be added to the schedule.	The infrastructure requirements in the IDP have been developed in consultation with infrastructure providers, including Essex County Council and the NHS Integrated Care Board. Providers were given early sight of the Regulation 19 plan proposals and offered the opportunity to comment on the infrastructure that would be required to support the planned growth. Neither ECC nor the ICB identified specific proposals in relation to early years and primary education provision or primary healthcare in Newport.
ANON-QNH5-RD6D-C	Sophie Innes	On behalf of an Organisation	Dianthus Land Ltd	Infrastructure Delivery Plan - support	A site promoter expresses support for the IDP and notes that it is a live document which should be updated to ensure consistency with the Local Plan when adopted.	The Council notes the support for the aim of the IDP and acknowledges the need for a further update once the examination has concluded and the Local Plan is adopted.
ANON-QNH5-RD7U-X	Saffron Walden Town Council	On behalf of an Organisation	Saffron Walden Town Council	Infrastructure Delivery Plan - education and healthcare (Saffron Walden)	Saffron Walden Town Council notes the findings of the IDP in relation to relocation of healthcare and EYCC provision in Saffron Walden, and suggests that these projects should be referenced in the Local Plan.	The IDP includes projects that are not wholly linked to the development proposed in the Local Plan. Some schemes, such as the Gold Street surgery relocation, are needed as a result of existing capacity issues, but it is acknowledged that the strategic allocations will result in additional demand for healthcare and education. It is not considered necessary to list all infrastructure requirements in the plan document, and the site development templates note that all strategic allocations are expected to make proportionate contributions towards education capacity and healthcare provision in accordance with the requirements identified in the IDP. Site specific templates include requirements for on-site provision, including new EYCC provision on the Saffron Walden allocation.
ANON-QNH5-RD1S-P	Andrew Martin	On behalf of an Organisation	S. Robinson Farms Ltd	Landscape - insufficient regard to Conservation Areas and Listed Buildings	An organisation considers that the council have not given insufficient regard to the importance, significance and setting of both the Town Conservation Area and Church End Conservation Area and numerous listed buildings in proximity to the proposed Great Dunmow allocations in accordance with legislation.	The Council updated its Landscape Character Assessment and undertook a Landscape Sensitivity Assessment of parcels of land in which growth around the edges of settlements might be likely in relation the HELAA and Call for Sites process to aid the Site Selection process. The Council also undertook a Heritage Assessment and have consulted with Historic England. Planning Policies have been drafted such that the design of schemes will need to take such matters into consideration. The presents of a Conservation Area or Listed Building does not preclude development from taking place. The importance is on how and the design of development comes forward.
ANON-QNH5-RDN8-R	Great Dunmow Town Council	On behalf of an Organisation	Great Dunmow Town Council	Modelling - Great Dunmow	Traffic infrastructure modelling, particularly in relation to the impacts of proposed developments in Great Dunmow, is inconsistent and incomplete. There are significant gaps in the modelling of traffic impacts from proposed developments. The assessments fail to account for how development will affect key routes such as the A120 corridor. The Transport Study pre Reg 19 Model Outputs: A120 Corridor is based on data published in 2021. Car use dropped in 2020-21 due to the Covid pandemic and therefore the data is not an accurate representation of movements along the A120 corridor. Additionally, there is insufficient analysis of how public transportation can be enhanced or supported. The Transport Assessment does not sufficiently explore the long-term effects that increased traffic from proposed development will have on local infrastructure. It fails to model the cumulative impacts of multiple developments on traffic congestion, road safety, and public transport usage. Without this, the evidence base is incomplete and does not provide a clear understanding of whether the proposed developments can be supported by existing or future transport infrastructure. The report's discussion on the A120 corridor focuses on existing traffic conditions without modelling the increased strain that new developments will impose. The lack of a detailed traffic impact assessment weakens the case for the proposed developments and raises doubts about their viability in the long term. Great Dunmow Town Council state there has been insufficient modelling when considering reasonable alternatives included in the growth scenarios appraisal.	The transport evidence base prepared in support of the emerging Uttlesford Local Plan forms a robust and detailed analysis of the current and forecast future performance of the transport network across the district and beyond. It provides a proportionate analysis of future demand that will be placed on the network due to Local Plan development, and the interventions required to mitigate the impacts on local communities. The evidence is underpinned by the development of two transport models which were built in accordance with Department for Transport (DfT) TAG guidance, whilst also meeting the requirements of the National Planning Policy Framework (NPPF). The Council is satisfied that the transport assessment evidence and survey data that underpins the assessment was undertaken in line with the relevant guidelines issued at the time. Caution was taken when considering the modelling outputs from the baseline data, and comparisons were drawn with pre-COVID data. To ensure a robust assessment, 2021 Base flows were factored up during the forecasting to account for this. The Land at Highwood Quarry (UTT/24/0213/FUL) permission of up to 1200 homes was included in the Reg.19 Modelling. The Local Plan evidence base will be supplemented through more detailed analysis of site specific issues as and when individual allocation sites come forwards through the planning process. The comprehensive suite of transport evidence also includes a consideration of sustainable transport in the District including a full assessment of sustainable transport opportunities, a Local Cycling and walking Infrastructure Plan, the potential for public transport enhancements in the A120 corridor and consideration of how 'Shared Transport' schemes can be delivered on large scale development sites.

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					The location of the projected Helena Romanes through school means that there are now going to be several primary schools all on one side of the town, necessitating additional cross-town journeys for people living on the nth side of the town. This will add additional traffic. Modelling has not been undertaken. The approval of 1200 homes at appeal at Highwood Quarry will significantly increase traffic impacting road infrastructure in Great Dunmow. Modelling has not been undertaken. In 2021 Great Dunmow Town Council undertook modelling for this site which highlighted that the western section of the B1256 will be operating above capacity; central section of the B1256 Stortford Road will be under severe stress; West of Woodside Way Site Access Roundabout will possibly be over-capacity; site is not accessible by public transport; and, the walking and cycling routes rely on unlit Public Rights of Way. The Woodlands Way connection is essential to prevent development being car reliant.	
ANON-QNH5-RDHK-5	Jackie Deane - Parish Clerk	On behalf of an Organisation	Takeley Parish Council	Modelling – Takeley Parish Council	<p>Takeley Parish Council have submitted a report produced by Rialton TPC which details transport concerns in relation to proposed residential and employment allocations in Takeley. The report covers impact on the Four Ashes Junction, Sustainable Transport Strategy, impacts on other key highways, trip generation assumptions, impact of proposed school, HGVs in Takeley and impact on Junction 8 of the M11. Takeley Parish Council have submitted a report produced by Rialton TPC which details transport concerns in relation to proposed residential and employment allocations in Takeley. The report covers impact on the Four Ashes Junction, Sustainable Transport Strategy, impacts on other key highways, trip generation assumptions, impact of proposed school, HGVs in Takeley and impact on Junction 8 of the M11.</p> <p>Four Ashes Junction Sustainable Transport Strategy There are concerns about land safeguarded along Parsonage Road for strategic transport infrastructure. Trip generation assumptions TN320, Uttlesford Transport Study: Trip Generation sets out the methodology that has been used to derive trip generation rates for proposed allocations. Takeley has been incorrectly banded as a Band 2 Settlement. Due to incorrect banding, the TRICS data from which the base trip rates have been derived is for sites in suburban areas, on the edge of towns or in neighbourhood centres. It is unlikely that the proposed development would have greater access to a range of services and facilities than the types of locations where trip rates have been observed to inform the TRICS calculations. It is therefore likely that reductions in trip rates of between 28% and 39% are over-optimistic. It is not clear from the transport evidence base whether the methodology of internalising employment trips has meant that vehicles trips passing through the Four Ashes junction have been overlooked in the modelling. This issue needs to be clarified before it is possible to judge whether the modelling is providing a robust assessment of potential highways impact. Impacts on other key highways TN409 goes on to described the adverse impacts at other local junctions</p>	<p>The transport evidence base prepared in support of the emerging Uttlesford Local Plan forms a robust and detailed analysis of the current and forecast future performance of the transport network across the district and beyond. It provides a proportionate analysis of future demand that will be placed on the network due to Local Plan development, and the interventions required to mitigate the impacts on local communities. The evidence is under pinned by the development of two transport models which were built in accordance with Department for Transport (DfT) TAG guidance, whilst also meeting the requirements of the National Planning Policy Framework (NPPF).</p> <p>The Council is satisfied that the transport assessment evidence and survey data that underpins the assessment was undertaken in line with the relevant guidelines issued at the time. Caution was taken when considering the modelling outputs from the baseline data, and comparisons were drawn with pre-COVID data. To ensure a robust assessment, 2021 Base flows were factored up during the forecasting to account for this. The Local Plan evidence base will be supplemented through more detailed analysis of site specific issues as and when individual allocation sites come forwards through the planning process.</p> <p>The comprehensive suite of transport evidence also includes a consideration of sustainable transport in the District including a full assessment of sustainable transport opportunities, a Local Cycling and walking Infrastructure Plan, the potential for public transport enhancements in the A120 corridor and consideration of how ‘Shared Transport’ schemes can be delivered on large scale development sites.</p> <p><b>Detailed responses to the Takeley PC Consultant’s Report will be appended.</b></p>



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					<p>that are expected to arise as drivers seek to avoid the significant delays at the Four Ashes junction. At the B1256/Bambers Green Road, junction delays are shown to increase from 9 seconds to 189 seconds (2,000% increase) in the AM peak hour. This suggests that either or both of the following are occurring; 2-way flows on the B1256 may be so great that it will be difficult for drivers at side roads to turn onto the main road and/or the traffic modelling is re-routeing significant numbers of vehicles along Bambers Green Road to avoid the route through the Four Ashes junction. If flows are so high that drivers from side roads are unable to pull out safely then the impact on all priority junctions along this section of the B1256 will be severe. If the modelling is assuming rat running along the narrow and unsuitable Bambers Green Road, then severe adverse impacts are being ignored and the impact on the Four Ashes junction is being underestimated. No details of the junction modelling and no detailed traffic flow diagrams are provided so it is impossible to know whether the problems are associated with high flows along the B1256 or rat-running through Bambers Green. Delays at the site access are less severe but still significant. Data suggests that the size of the proposed allocation is such that a single point of access is not sufficient. At the B1256/Tilekiln Green junction the delays in the AM peak hour are predicted to increase from 234 sec in the Reference Case to 1,695 sec in the Local Plan case (624% increase). Mitigation involves widening the Tilekiln Green arm of the junction and introducing traffic signals. A review of the extent of existing highway land suggests that there is insufficient land to allow the proposed widening. Journey time son the B1256 and B183 are expected to increase.</p> <p>HGVs in Takeley None of the mitigation measures proposed will minimise the impact of HGVs on Takeley as a result of development. The modelling work in relation to HGVs is unclear. The large employment allocation at Takeley could significantly increase the number of HGV movements. This will also impact on the congested J8 of the M11. Land North of Taylors Farm has the potential to lead to significant adverse highways impacts on the B1256 through Takeley Street and Takeley and even if these impacts are avoided through some form of HGV movement control, all vehicles will impact directly on the M11 J8 rather than being able to avoid this junction by accessing the A120 and using the existing slip roads between the M11 south and A120.</p> <p>Impact of proposed secondary school Development of the new school north of the B125 will generate significant increase in traffic particularly at peak times. No discussion is provided to consider the impacts of locating a significant generator of traffic immediately adjacent to the B1256 on the eastern side of Takeley. The modelling suggest significant delays at the access junction to the proposed school.</p> <p>Impact on Junction 8 of the M11 Any new development at Takeley will directly impact on J8 of the M11. Junction 8 is already congested, particularly at peak times at London Stansted Airport. Taking into consideration the proposed development at the airport this will add significant levels of traffic.</p>	



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					Essex Highways is implementing a scheme to improve J8 but it only provides some additional capacity on the M11 off-slips and provides an opportunity to better manage traffic between the A120 and the A1250 west of J8. To upgrade the circulating carriageway of the roundabout junction would require very major (and expensive) reconfiguration of the junction and such a scheme is not currently being considered. The proposed major housing allocation east of Takeley and the proposed employment allocation at Takeley Street will adversely impact on J8 that is already congested and future expansion will exacerbate this issue.	
ANON-QNH5-RD9F-H	Martin Knolle	Individual / member of the public		Modelling Mitigation – Saffron Walden	The Respondent is concerned about the proposal to install several sets of traffic lights at the junctions of Audley End Road, London Road, Borough Lane and Newport Road. The Respondent has struggled to get responses from Uttlesford District Council and Essex County Council on the reasons for the proposal. The Respondent is concerned about the lack of legal compliance (and/or lack of compliance with duty to co-operate). The proposed traffic lights would produce long queues of stationary traffic, particularly at peak times. The proposed changes would result in the traffic from one of the merging directions (Audley End Road or Newport Road heading to London Road; London Road or Borough Lane heading to Audley End Road/Newport Road) being stopped at a red light within a short distance. This will result in large amounts of queueing traffic, with increased noise and air pollution. The Respondent is concerned about the impact of air pollution in the area. The proposed traffic lights could lead to vehicle idling due to traffic queueing. The traffic lights proposal should be removed from the Infrastructure Delivery Plan July 2024, page 87 internal page references C-20 to C-22 and Interventions T14 and T15. In relation to the transport studies the data was collected in 2021 during the Covid pandemic and therefore the data collected does not represent normally travel movements.	The transport evidence base prepared in support of the emerging Uttlesford Local Plan forms a robust and detailed analysis of the current and forecast future performance of the transport network across the district and beyond. It provides a proportionate analysis of future demand that will be placed on the network due to Local Plan development, and the interventions required to mitigate the impacts on local communities. The evidence is under pinned by the development of two transport models which were built in accordance with Department for Transport (DfT) TAG guidance, whilst also meeting the requirements of the National Planning Policy Framework (NPPF). The Council is satisfied that the transport assessment evidence and survey data that underpins the assessment was undertaken in line with the relevant guidelines issued at the time. Caution was taken when considering the modelling outputs from the baseline data, and comparisons were drawn with pre-COVID data. To ensure a robust assessment, 2021 Base flows were factored up during the forecasting to account for this. The suggested interventions in Saffron Walden form part of a comprehensive approach to traffic management in the town. The Local Plan evidence base will be supplemented through more detailed analysis of site specific issues as and when individual allocation sites come forwards through the planning process. The comprehensive suite of transport evidence also includes a consideration of sustainable transport in the District including a full assessment of sustainable transport opportunities, a Local Cycling and walking Infrastructure Plan, the potential for public transport enhancements in the A120 corridor and consideration of how ‘Shared Transport’ schemes can be delivered on large scale development sites.
ANON-QNH5-RDD2-8	Anghara d Parry	Individual / member of the public		Modelling Mitigation – Saffron Walden	The respondent is concerned about the legal compliance and adequate evidence base. The evidence base for the Transport Study is based on 2021 evidence. Therefore, the evidence is likely impacted by the Covid Pandemic and may not reflect normal travel movements. The Transport Study appears to be published after the end of the Reg 18 consultation. The Respondent requests that the proposal for traffic lights at junctions Newport Road/London Road/Borough Lane/Audley End Road and Audley Road/war memorial area is removed for the below reasons. <ul style="list-style-type: none"> <li>• The traffic lights proposal and possible one-way street appears to mirror proposals refused in 2018 as the proposal was considered unsafe and not achievable.</li> <li>• Impact on air pollution with particular impact on school children: The proposal would result in vehicle idling at schools and nurseries with associated air pollution impacts.</li> <li>• It is unclear as to how the proposal would operate in practicality.</li> <li>• Currently traffic in the area flows and keeps moving. The proposal for 4-5 sets of traffic lights in approximately 1 mile radius will impact traffic movements.</li> </ul>	The transport evidence base prepared in support of the emerging Uttlesford Local Plan forms a robust and detailed analysis of the current and forecast future performance of the transport network across the district and beyond. It provides a proportionate analysis of future demand that will be placed on the network due to Local Plan development, and the interventions required to mitigate the impacts on local communities. The evidence is under pinned by the development of two transport models which were built in accordance with Department for Transport (DfT) TAG guidance, whilst also meeting the requirements of the National Planning Policy Framework (NPPF). The Council is satisfied that the transport assessment evidence and survey data that underpins the assessment was undertaken in line with the relevant guidelines issued at the time. Caution was taken when considering the modelling outputs from the baseline data, and comparisons were drawn with pre-COVID data. To ensure a robust assessment, 2021 Base flows were factored up during the forecasting to account for this. The Local Plan evidence base will be supplemented through more detailed analysis of site specific issues as and when individual allocation sites come forwards through the planning process. The comprehensive suite of transport evidence also includes a consideration of sustainable transport in the District including a full assessment of sustainable transport opportunities, a Local Cycling and walking Infrastructure Plan, the potential for public transport enhancements in the A120 corridor and consideration of how ‘Shared Transport’ schemes can be delivered on large scale development sites.

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					<ul style="list-style-type: none"> <li>• The peak hours predicted in the evidentiary basis are not the peak hours for the area, given the presence of major schools.</li> <li>• The proposal appears to channel significant traffic to a route which has an antique and low-weight limit bridge by Audley End which is unsafe and unsustainable.</li> </ul>	
ANON-QNH5-RD7U-X	Saffron Walden Town Council	On behalf of an Organisation	Saffron Walden Town Council	Modelling Mitigation – Saffron Walden	<p>It is uncertain how the Transport Study will work alongside the Local Plan. Saffron Walden Town Council make the following comments:</p> <ul style="list-style-type: none"> <li>• Para 1.3.1: Other developments have been granted since Chase New Homes Former Friends School and Thaxted Road sites around 270 homes. These should be included.</li> <li>• TM.15 - TM.17 - One-way Borough Lane and one-way Debden Road was proposed in the 2013 Essex Highway Impact Assessment and its delivery was proposed within the Radwinter Road Linden Homes S106 agreement. Residents’ opposition was supported by SWTC and the SW ECC Cllr. In 2021 ECC agreed not to pursue the scheme and it was discounted, therefore, it should be removed from the strategy.</li> <li>• TM.22 (Page 9): Pedestrianise Church Street - It is unclear how vehicular access will be granted to residents, acknowledging residents were recently granted residents parking spaces on this road.</li> <li>• TM.24 (Page 9): Pedestrianise Market Square - SWTC applied for partial pedestrianisation of the Market Square in 2022 with little to no progress from ECC. It is unclear how this (and other schemes) will be implemented. SWTC applied for a partial closure, in line with the response to SWTC’s public consultation, which was in favour of a partial closure. How does this fit in with pedestrianisation of Market Square.</li> <li>• CP.01(Page 10): Increase Swan Meadow – CCTV needs to be installed due to anti-social behaviour. SWTC will need to strongly consider the decking proposal and its environmental and aesthetic impact.</li> <li>• CP.09 (Page 10): Removal of all on street parking, except residential could impact the available parking for visitors, with only the Common and Swan Meadow available.</li> <li>• CP.13/14: Park and Ride - There is no clarity surrounding, the location(s), monitoring and bus transportation.</li> <li>• Page 10: Pub car parking is limited, unsure how this will work feasibly.</li> <li>• Cp.16 (Page 10) Vehicle message signage - Newport Road and Windmill Hill have signage. There is a need to clarify whether Radwinter Road, Ashdon Road and Thaxted Road where the 30mph speed limit begins and ends are the proposed locations.</li> <li>• Page 10 - Any long-term maintenance and/or adoption considered.</li> <li>• CY.29 (Page 11) - It would not be a simple or easy matter to widen the path, as The Common is a registered village green.</li> <li>• WK.01 (Page 11) - The completion of the pavement in Wenden Road linking SW with Audley End Rail Station would improve safety for pedestrians.</li> <li>• WK.01(Page 11) - An existing decluttering scheme was submitted to the LHP several years ago but ECC has not completed the works</li> <li>• Page 11 - Provision of a new footway from Newport Road to Saffron Walden County High School would support pedestrians walking to and from Saffron Hall/Screen as well.</li> <li>• PT.01- 09 (Page 11) - Any improvements that would enhance the</li> </ul>	<p>The transport evidence base prepared in support of the emerging Uttlesford Local Plan forms a robust and detailed analysis of the current and forecast future performance of the transport network across the district and beyond. It provides a proportionate analysis of future demand that will be placed on the network due to Local Plan development, and the interventions required to mitigate the impacts on local communities. The evidence is underpinned by the development of two transport models which were built in accordance with Department for Transport (DfT) TAG guidance, whilst also meeting the requirements of the National Planning Policy Framework (NPPF).</p> <p>The Council is satisfied that the transport assessment evidence and survey data that underpins the assessment was undertaken in line with the relevant guidelines issued at the time. Caution was taken when considering the modelling outputs from the baseline data, and comparisons were drawn with pre-COVID data. To ensure a robust assessment, 2021 Base flows were factored up during the forecasting to account for this. The suggested interventions in Saffron Walden form part of a comprehensive approach to traffic management in the town.</p> <p>The Uncertainty Log which includes the consented developments or those which are likely to be delivered within the Plan period, however, it is a ‘point in time’ process and there will always be sites that are given consent beyond the ‘cut-off’ date of the log.</p> <p>The Local Plan evidence base will be supplemented through more detailed analysis of site specific issues as and when individual allocation sites come forwards through the planning process.</p> <p>The comprehensive suite of transport evidence also includes a consideration of sustainable transport in the District including a full assessment of sustainable transport opportunities, a Local Cycling and walking Infrastructure Plan, the potential for public transport enhancements in the A120 corridor and consideration of how ‘Shared Transport’ schemes can be delivered on large scale development sites.</p>

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					connectivity, frequency, reliability, affordability and environmental friendliness of bus services are welcome. • 4.3.2 (Page 19) - SWTC campaigned for a 20mph speed limit but the request was refused and deemed unnecessary, the implementation of this proposal is unclear.	
ANON-QNH5-RDMM-C	Christine Griffin	On behalf of an Organisation	Newport Parish Council	Newport housing requirement	Comment from Newport Parish Council that the 300 dwelling housing requirement figure should not be a ‘fair share’ calculation and instead should be based on constraints that apply.	The Regulation 18 Local Plan proposed 412 dwellings across two strategic sites albeit the potential for these sites was significantly larger. The rationale for reducing the scale of development is not because there are any questions about the potential for development at Newport, it is to ensure a balance is struck between not having so much development that greater mitigation is needed, for example to address any highway impacts, whilst there being sufficient development to ensure any necessary infrastructure is capable of being funded. The Parish Councils representation to the Regulation 18 draft Local Plan made clear that whilst the Parish considered that development at Newport should be addressed through a Neighbourhood Plan, the level of growth did not need to be reduced. Furthermore, the District Councillor for Newport has expressed concern that if the level of growth is reduced, the level of infrastructure needed at Newport may not be sufficient. Whilst the Council is satisfied the balance of 300 homes to be delivered on non-strategic sites is appropriate, the Neighbourhood Plan does have the flexibility to plan for more as set out in the Reg 18 response from Newport Parish Council and expressed by the Newport Councillor.
ANON-QNH5-RDMM-C	Christine Griffin	On behalf of an Organisation	Newport Parish Council	Newport requirement - clarifications	Comment querying whether the reduced housing requirement at Newport (300 instead of 412) is able to be accommodated by expansion on the primary or secondary school. Objects to use of the word ‘town’ for Newport as it is a village. Also notes that at Regulation 18 stage the allocations were to the west and not the east.	The comment from Essex County Council relates to primary school provision. Reference to a town council and the draft allocation at Regulation 18 stage being at the east of the village were typographical errors
ANON-QNH5-RDAH-U	Steven Butler	On behalf of an Organisation	Vistry Group (Thaxted)	Omission site promotion	Objections from the promoters at omission sites, with promotions at Great Dunmow; Stansted Mountfitchet; Thaxted; Felsted; Newport; Stebbing, Henham; Hatfield Broad Oak; Little Hallingbury; Little Roden; south of Bamber’s Green and to the east of Stansted Airport and Fitch Green.	The spatial strategy for the plan focuses growth at the Key Settlements, Local Rural Centres/Small Town and Larger Villages, in line with Core Policy 2 and 3. Strategic allocations are made in line with the Site Selection Topic Paper at the Key Settlements and Local Rural Centres/Small Towns; with Newport and the Larger Villages set Housing Requirement Figures for non-strategic allocations to be made through a Neighbourhood Plan in line with Core Policy 6a and 19. The reasons for not allocating the omission sites at Great Dunmow, Stansted Mountfitchet and Thaxted are provided in the Site Selection Topic Paper, with further information provided in the response to Core Policy 2. At Newport and the Larger Villages of Felsted, Stebbing and Hatfield Broad Oak, the sites could be allocated through a Neighbourhood Plan under Core Policy 19. For sites Smaller Villages and Open Countryside, these would not be in accordance with the Core Policy 2 or 3 and would subsequently not be allocated.
ANON-QNH5-RDAS-6	David Churchill	On behalf of an Organisation	Wethersfield Homes Ltd			
ANON-QNH5-RDA8-B	n/a	On behalf of an Organisation	Phase 2 Planning Ltd			
ANON-QNH5-RDRA-5	Robert Barber	On behalf of an Organisation	Pegasus Group on behalf of Bloor Homes Eastern			
ANON-QNH5-RD3C-8	Conor Layton	On behalf of an Organisation	Pelican Developments Ltd C/O BNP Paribas Real Estate			
ANON-QNH5-RD39-X	Higgins Group	On behalf of an Organisation	Boyer on behalf of Higgins Group			
ANON-QNH5-RD3S-R	Derek Stebbing (Agent)	On behalf of an Organisation	Legal & General Property			
ANON-QNH5-RDWA-A	James Bailey	On behalf of an Organisation	James Bailey Planning Ltd on behalf of			

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			Welbeck Strategic Land V Limited and Ms Hawkes			
ANON-QNH5-RDWM-P	Alice Maguire	On behalf of an Organisation	The Trustees of the CH Gosling 1965 Settlement			
ANON-QNH5-RDWQ-T	Amy Lomath	On behalf of an Organisation	Taylor Wimpey			
ANON-QNH5-RDAK-X	Phase 2 Planning Ltd (agent)	On behalf of an Organisation	Lindpet Investments Ltd			
ANON-QNH5-RDAR-5	Mark Wellings	On behalf of an Organisation	Montare LLP			
ANON-QNH5-RDAW-A	Steven Butler	On behalf of an Organisation	Vistry Group (Newport)			
ANON-QNH5-RDY8-3	Garry LeCount	Individual / member of the public		Parish vs Settlement	Between Regulation 18 and Regulation 19 the approach to calculating the housing requirement has changed from a Parish-based approach to a settlement-based approach. This is particularly unfair on Henham which has seen a great deal of development within the Parish.	The approach to a settlement-based approach was made in light of feedback received during the consultation that some villages had artificially high scores in the settlement facilities study because of the existence of multiple settlements in a single parish, and that the settlement hierarchy should be based on settlement data rather than parish data. However this only relates to the Settlement Facilities Study. This was further explained in workshops with parish councils at the larger villages in spring 2024. The spatial strategy relates to settlements and for all intents and purposes is blind to parish boundaries. Development within Henham Parish that is adjacent to the settlement of Elsenham has been calculated as development at Elsenham. This is consistent with the approach taken at all Larger Villages. The residual housing requirement for Henham, and all other Larger Villages, is expected to be met within or adjacent to the settlement, in line with CP2 and CP3.
ANON-QNH5-RD1R-N	Neil Hargreaves	On behalf of an Organisation	Steering Group of the Newport Quendon & Rickling Neighbourhood Plan	Policies Map - Chalk Streams	The Chalk Streams designation on the Policies Map appear to be based on EA Flood Zone 2. The Newport, Quendon and Rickling Neighbourhood Plan contains more detail and should be preferred to the Council's Policies Map in order to avoid conflict.	As stated in Core Policy 25 the designation is based on the EA mapping definition of "main rivers" and ties in with the Natural England Biodiversity Metric. This approach is deemed appropriate at the district-wide scale.
ANON-QNH5-RDMC-2	Vivian Falk	On behalf of an Organisation	St Mary's Church, Saffron Walden	Saffron Walden - Church Street	St Mary's Church state that the following should be taken into consideration if Church Street in Saffron Walden is pedestrianised: <ul style="list-style-type: none"> <li>• Access to the Church is required at all times.</li> <li>• Many of our congregation and visitors are elderly or disabled and do not live near by.</li> <li>• The Church offices are on site with staff and volunteers who need to drive in.</li> <li>• Vehicle access is required for staff/volunteers, maintenance and special events.</li> </ul>	The Council welcomes the comments by St Mary's Church and the need for consultation and consideration of the Church users needs is noted.
ANON-QNH5-RDCX-D	Theresa Trotzer Wilson	On behalf of an Organisation	HATFIELD BROAD OAK PARISH COUNCIL	Scenario 2 and 3 should be favoured	Object to use of the average of all four scenarios; and instead only Scenarios 2 and 3 should be used as it reflects the population size and sustainability and service level of each settlement. The even split does not take population or sustainability into account.	There is no national methodology for calculating housing requirement figures for neighbourhood areas. NPPF paragraph 67 states that strategic policies should “set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations”. NPPF paragraph 68 requires local planning authorities to set “indicative housing



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						requirements” for neighbourhood areas “if requested to do so”, taking into account factors “including the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority”. As outlined in the Larger Villages and Newport Housing Requirement Topic Paper four different scenarios were developed which could be a reasonable method for calculating the housing requirement figure; however it was considered that taking an average across all four scenarios was pragmatic as it balanced the spatial strategy, settlement hierarchy, population and settlement service score factors. This is considered a sound approach.
ANON-QNH5-RD1H-B	Matthew Thomas	On behalf of an Organisation	CODE Development Planners on behalf of G W Balaam and Son	Scenario 3 should be used instead of an average	Object to use of the average of all four scenarios; and instead simply Scenario 3 should be used as it reflects the sustainability and service level of each settlement. An even split or weighting by population does not take sustainability into account.	There is no national methodology for calculating housing requirement figures for neighbourhood areas. NPPF paragraph 67 states that strategic policies should “set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations”. NPPF paragraph 68 requires local planning authorities to set “indicative housing requirements” for neighbourhood areas “if requested to do so”, taking into account factors “including the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority”. As outlined in the Larger Villages and Newport Housing Requirement Topic Paper four different scenarios were developed which could be a reasonable method for calculating the housing requirement figure; however it was considered that taking an average across all four scenarios was pragmatic as it balanced the spatial strategy, settlement hierarchy, population and settlement service score factors. This is considered a sound approach.
ANON-QNH5-RDC8-D	Matthew Thomas	On behalf of an Organisation	CODE Development Planners on behalf of G W Balaam & Son	Scenario 3 should be used instead of an average	Object to use of the average of all four scenarios; and instead simply Scenario 3 should be used as it reflects the sustainability and service level of each settlement. An even split or weighting by population does not take sustainability into account.	There is no national methodology for calculating housing requirement figures for neighbourhood areas. NPPF paragraph 67 states that strategic policies should “set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations”. NPPF paragraph 68 requires local planning authorities to set “indicative housing requirements” for neighbourhood areas “if requested to do so”, taking into account factors “including the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority”. As outlined in the Larger Villages and Newport Housing Requirement Topic Paper four different scenarios were developed which could be a reasonable method for calculating the housing requirement figure; however it was considered that taking an average across all four scenarios was pragmatic as it balanced the spatial strategy, settlement hierarchy, population and settlement service score factors. This is considered a sound approach.
ANON-QNH5-RD7J-K	Fiona Price	Individual / member of the public		Settlement facilities and services study - Henham	Comment querying the scoring for Henham in the Settlement Services and Facilities Study, and the sustainability of the settlement to accommodate additional non-strategic development under Core Policy 19.	The Settlement Facilities and Services Study was undertaken to provide evidence of the services and facilities at settlements across the district, which has in turn led to an understanding of the relative sustainability of settlements, and the classification of settlements into different 'tiers' in the Settlement Hierarchy. The study presents a snapshot in time of the data available and recommends a settlement hierarchy for consideration in the new Local Plan. Although the level of services and facilities available may vary over time, this does not mean the relative classification of different settlements should necessarily change. At Regulation 19 stage Henham had a 'service score' of 74, which puts it at the top end of the Larger Villages Appendix 2 provides a granular understanding of how the score was arrived at for each settlement. The scoring was undertaken based on desktop assessment and input from Parish Councils via a survey, which was checked by officers. There is no nationally recognised methodology for assessing local facilities and services and determining a settlement hierarchy. The methodology used recognises the dispersed settlement pattern in Uttlesford and considers the different types of service provision and connectivity throughout the district, and is considered robust and sound within the Uttlesford context.
ANON-QNH5-RDUC-A	Trevor Ellis-Callow	Individual / member of the public		Settlement facilities and services study - Henham	Comment querying the scoring for Henham in the Settlement Services and Facilities Study, and the sustainability of the settlement to accommodate additional non-strategic development under Core Policy 19.	The Settlement Facilities and Services Study was undertaken to provide evidence of the services and facilities at settlements across the district, which has in turn led to an understanding of the relative sustainability of settlements, and the classification of settlements into different 'tiers' in the Settlement Hierarchy. The study presents a snapshot in time of the data available and recommends a settlement hierarchy for consideration in the new Local Plan. Although the level of services and facilities available may vary over time, this does not mean the relative classification of different settlements should necessarily change. At Regulation 19 stage
ANON-QNH5-RDUA-8	Gemma Scott	Individual / member of the public				



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ANON-QNH5-RD9K-P	Andrew Ttofalli	Individual / member of the public				Henham had a 'service score' of 74, which puts it at the top end of the Larger Villages Appendix 2 provides a granular understanding of how the score was arrived at for each settlement. The scoring was undertaken based on desktop assessment and input from Parish Councils via a survey, which was checked by officers. There is no nationally recognised methodology for assessing local facilities and services and determining a settlement hierarchy. The methodology used recognises the dispersed settlement pattern in Uttlesford and considers the different types of service provision and connectivity throughout the district, and is considered robust and sound within the Uttlesford context.
ANON-QNH5-RDCW-C	Jane Smith	Individual / member of the public				
ANON-QNH5-RDT6-V	Anthony Gibbs	Individual / member of the public				
ANON-QNH5-RD9T-Y	James Ward	Individual / member of the public				
ANON-QNH5-RDDF-V	Mary and Lloyd Tripp	Individual / member of the public				
ANON-QNH5-RD77-Z	Derek Ward	Individual / member of the public				
ANON-QNH5-RD78-1	Joan Franklin	Individual / member of the public				
ANON-QNH5-RDW6-Y	Laurence Ward	Individual / member of the public				
ANON-QNH5-RDHT-E	Lisa Fuller	Individual / member of the public				
ANON-QNH5-RDXH-J	Mark Fisher	Individual / member of the public				
ANON-QNH5-RDXX-2	Andrew Ttofalli	Individual / member of the public				
ANON-QNH5-RDDY-F	Jason Collins	Individual / member of the public		Settlement Facilities and Services Study data - Debden	Comment querying the scoring for Debden in the Settlement Services and Facilities Study, and the sustainability of the settlement to accommodate additional non-strategic development under Core Policy 19.	The Settlement Facilities and Services Study was undertaken to provide evidence of the services and facilities at settlements across the district, which has in turn led to an understanding of the relative sustainability of settlements, and the classification of settlements into different 'tiers' in the Settlement Hierarchy. The study presents a snapshot in time of the data available and recommends a settlement hierarchy for consideration in the new Local Plan. Although the level of services and facilities available may vary over time, this does not mean the relative classification of different settlements should necessarily change. At Regulation 19 stage Debden had a 'service score' of 44, which puts it at the lower end of the Larger Villages Appendix 2 provides a granular understanding of how the score was arrived at for each settlement. The scoring was undertaken based on desktop assessment and input from Parish Councils via a survey, which was checked by officers. There is no nationally recognised methodology for assessing local facilities and services and determining a settlement hierarchy. The methodology used recognises the dispersed settlement pattern in Uttlesford and considers the different types of service provision and connectivity throughout the district, and is considered robust and sound within the Uttlesford context.
ANON-QNH5-RDDQ-7	Jane Collins	Individual / member of the public				
ANON-QNH5-RDDZ-G	Jane Ward-Booth	Individual / member of the public				
ANON-QNH5-RDRV-T	Stephen Jsper	Individual / member of the public				
ANON-QNH5-RDR2-P	Ian Carter	Individual / member of the public				

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ANON-QNH5-RDA9-C	Roger Manser	Individual / member of the public				
ANON-QNH5-RD3K-G	Simon Langman	Individual / member of the public				
ANON-QNH5-RDNT-M	Robert Tetlow	On behalf of an Organisation	DEBDEN BARNES			
ANON-QNH5-RDHN-8	Chris Lane	Individual / member of the public		SFRA - Great Dunmow flood risk	The comment suggests that the SFRA did not assess the effects of development of the site on flood risk at Church End and Bigods Lane. The comment highlights current fluvial, surface water and groundwater flood pathways and cites recent flood events on Bigods Lane which it is asserted would worsen if the site were developed. The respondent suggests that on-site mitigation is insufficient to mitigate the downstream flood risk.	The Council considers that the Level 2 Strategic Flood Risk Assessment provides a robust assessment not only of the on-site flood risk, but also the potential impact of development on areas beyond the site boundary and the mitigation that would be required to minimise those risks. Each of the strategic housing site allocations is accompanied by a detailed assessment in Appendix A of the Level 2 SFRA which clearly identifies the potential off-site flood risk and the likely sources of that risk. For the North East Great Dunmow site allocation, the SFRA concludes that development of the site should not increase flood risk either on or off the site, but it makes specific recommendations with regard to the use of SuDS, the incorporation of surface water flow paths into green and blue infrastructure designs, and a site-wide drainage strategy in order to manage flood risk. All development proposals for the site should comply with the recommendations set out in the SFRA, including the requirement for a site-specific flood risk assessment and the guidance on site design.
ANON-QNH5-RDMM-C	Christine Griffin	On behalf of an Organisation	Newport Parish Council	SFRA - Newport flood risk	Newport Parish Council have stated that the SFRA includes incorrect information with regard to flood risk in Newport and have provided a copy of the Environment Agency's flood risk mapping along with images showing recent flooding events in the village.	Appendix E of the Level 1 SFRA provides a descriptive summary of flood risk across the District, with specific mention of Newport. It is supported by detailed flood risk mapping contained in Appendix A of the same report. This mapping appears to correspond exactly with the Environment Agency map provided by the Parish Council and it clearly shows elevated risk of fluvial and surface water flooding in the locations mentioned in the representation. It is therefore unclear which aspect of the flood risk information is perceived to be inaccurate.
ANON-QNH5-RDUP-Q	Loftus Buhagiar	Individual / member of the public		Stebbing services and facilities	Response querying what services have been identified in Stebbing, in calculating the larger village housing requirement	Appendix 2 of the Settlements and Facilities Study provides a granular breakdown of the scoring at Stebbing. Stebbing has a Service Score of 50 overall, which ranks it in the middle of all Larger Villages (Clavering the highest at 74 and Debden the lowest at 44).
ANON-QNH5-RDA6-9	Jonathan Dixon	On behalf of an Organisation	Savills on behalf of Endurance Estates Limited	Suppressed demand for industrial and wider Property Market Area	Savills representation that the Employment Needs Update Report underestimates future demand for employment land as it does not adequately take into account historic suppressed demand and future market drivers. It is also suggested that the area between Bishop's Stortford and Stansted Airport is within a wider Property Market Area that extends beyond Uttlesford and into East Hertfordshire and that the need is higher as a result and that Green Belt exceptional circumstances exist to allocate sites in this location.	Replacement demand is applied to labour scenarios in the Employment Needs Update as they are net change above change in stock. Replacement demand is also applied to net stock change as this may be diminishing due to age related inadequacy. Gross absorption does not include move outs so misrepresents demand, whereas net absorption captures all demand unless the market is suppressed through insufficient stock. The margin (20%) and current vacancy top up (UENU para 5.38) are intended to respond to this. The Local Plan fully meets the identified employment need with some over-provision. The Council has not been asked to consider any employment need for neighbouring authorities, although it should be noted that Stansted Airport includes substantial employment provision that has a wider role and is considered out-with the Uttlesford need, thus there is already a substantial contribution to the needs of the wider area. The Council's approach to Green Belt is addressed in relation to other responses.
ANON-QNH5-RDAD-Q	Marie Jasper	On behalf of an Organisation	Landsec	Sustainability Appraisal - Easton Park	The Sustainability Appraisal (paragraph 5.2.38) confirms there is a national and local case to be made for Garden Communities, including new settlements. However, the Sustainability Appraisal is the evidential source of the conclusion that a Garden Community should not be considered in the draft Plan, therefore the Sustainability Appraisal is inconsistent with itself. The conclusion that the numerical argument is weak, is inconsistent with the evidence in the Housing Delivery Report (2023) which advocates a broad portfolio of different kinds and sizes of site. Also, given that the Sustainability Appraisal notes there is a national and local case to be made for garden communities, it is inconsistent to then scope out Garden Communities as an unreasonable alternative for the	We disagree with the suggestion that it is inconsistent to discuss the high level case for a garden community but then ultimately reach a decision not to progress a garden community to the RA growth scenarios. Work to define RAs must be guided by the plan objectives, an understanding of the plan period, strategic factors including housing need and understanding of infrastructure issues and opportunities. All of these strategic factors fed into a conclusion that there is no reasonable growth scenario involving allocation of a new settlement (at the current time; N.B. a new settlement did feature in the RA growth scenarios at Reg 18), but the decision was also made in light of proportionate consideration of new settlement options. We disagree with the suggestion that it is inconsistent to conclude both that the numerical argument for a new settlement is weak and that there is a need for a mix of sites. We disagree with the suggestion that it is inconsistent to explore the high level case for a new settlement and then to go on explore specific options despite the high level case being weak.

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					<p>draft Plan. This is a significant weakness in the Sustainability Appraisal which undermines the legality and soundness of the draft Plan.</p> <p>We also note that the Sustainability Appraisal appears to subsequently consider potential Garden Community sites, in the context of the settlement hierarchy. Easton Park, for example, is reviewed as part of Great Dunmow sub area considerations. This suggests an internal inconsistency regarding the approach of the Sustainability Appraisal to Garden Communities.</p> <p>While Landsec welcomes the recognition that the Easton Park Garden Community opportunity is suitable for further consideration, this recognition is inconsistent with this opportunity not having been fully considered as part of the current Plan making process.</p>	We disagree with the suggestion that it is inconsistent to identify sites that warrant ongoing consideration despite not warranting being progressed to the RA growth scenarios.
ANON-QNH5-RDRS-Q	Richard Agnew	On behalf of an Organisation	Gladman Developments Ltd	Sustainability Appraisal - Church End allocation	Gladman support the SA's process with its clear justification for its policy choices.	Response noted and welcomed.
ANON-QNH5-RD34-S	Adam Davies	On behalf of an Organisation	The Davies Family	Sustainability Appraisal - Clavering brownfield	<p>Concern</p> <p>“The SA does not provide sufficient clarity regarding alternative spatial strategies that could avoid or mitigate environmental harm. Indeed, the SA confirms that simply achieving an up-to-date local plan is key and therefore discounts the potential for a new settlement to be part of the strategy when clearly they are intended to be part of a longer term strategy going forward.”</p> <p>The appraisal work presented within the SA Report lacks rigour, notably around its discussion of the environmental impacts of directing growth to the southern part of the District.</p> <p>“It is also noted that the adequacy of the SA was highlighted as a problem with the last withdrawn Plan. It is notable, that the past SA considered very different growth options to the current SA. This suggests inconsistency in approach and in fact that the SA has been designed to fit the Plan rather than inform it.”</p>	<p>With regards to defining reasonable alternatives, this must be guided by the plan objectives, an understanding of the plan period and strategic factors including housing need and understanding of infrastructure issues and opportunities. All of these strategic factors fed into a conclusion that there is no reasonable growth scenario involving allocation of a new settlement (at the current time; N.B. a new settlement did feature in the RA growth scenarios at Reg 18), but the decision was also made in light of proportionate consideration of new settlement options.</p> <p>On the appraisal point, the appraisal was informed by detailed consideration of wide-ranging evidence, including Regulation 18 consultation responses. Within the Interim SA Report published at the Regulation 18 stage detailed work was undertaken to explore issues and options, which generated consultation responses that then fed into subsequent work.</p> <p>On the final point, it is unclear whether this is referring to work presented within the Interim SA Report (2023) or work undertaken in previous years in a very difficult context. We do not follow or agree with the final point on what the alleged inconsistency serves to suggest.</p>
ANON-QNH5-RD3V-U	Rupert Kirby	On behalf of an Organisation	J F Kirby & Son	Sustainability Appraisal - East of Great Dunmow	The reasonable alternative growth scenarios are too narrow, and specifically in respect of exploring alternative approaches to growth at Great Dunmow.	<p>The decision on sub-area scenarios for Great Dunmow to progress to the RA growth scenarios (specifically, three sub-area scenarios), was reasonable in light of the process set out across Section 5, also recognising the context to defining RAs set out within Section 4.</p> <p>In particular, key analysis is presented under the Great Dunmow sub-heading within Section 5.4 (Sub-area scenarios), drawing upon preceding Section 5.2 (Strategic factors) and Section 5.3 (Site options). Within this section the omission site in question is discussed alongside other sites in contention for allocation, before a decision is made not to take the site forward. As part of this, consideration was naturally given to the inherent merits of smaller sites relative to larger sites (and vice versa). The concluding discussion within this section notably states at para 5.4.66: “No other omission sites stand-out as being ‘of note’ at the current time, i.e. in the context of the current Local Plan (given the strategic factors discussed in Section 5.2)...”</p>
ANON-QNH5-RDWA-A	James Bailey	On behalf of an Organisation	James Bailey Planning Ltd on behalf of Welbeck Strategic Land V Limited and Ms Hawkes	Sustainability Appraisal - Flitch Green	<p>The Sustainability Appraisal mechanism requires all alternative options to have been considered; are the Council satisfied that they have fully explored all the alternative options? What if the Larger Villages cannot deliver the level of growth set out in the Plan as historic impacts would be too high? What if there are other settlements without historic environment implications which could deliver appropriate growth? Former new settlements such as Flitch Green should be appraised for</p>	The SA Report does not explore the possibility of allocation at smaller villages such as Flitch Green, given the plan objectives and the strategic context. The SA Report does, however, give proportionate consideration to strategic growth options that could deliver transformational growth at smaller villages akin to a new settlement.

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					their potential to deliver planned growth over the Plan Period. Failure to do this means that all alternative options have not been explored	
ANON-QNH5-RDTZ-Z	Stacey Rawlings	On behalf of an Organisation	Roebuck Land and Planning Ltd on behalf of Catesby land Promotions Ltd	Sustainability Appraisal - Great Chesterford	The Sustainability Appraisal has been updated but no further work has been done on Great Chesterford... The lack of testing of any increase in housing through the stated growth scenarios is fundamentally flawed.	The decision to hold the Great Chesterford sub-area constant across the RA growth scenarios was reasonable in light of the process set out across Section 5 of the SA Report, also recognising the context to defining RAs set out within Section 4. Specifically, a final decision is reached under the Great Chesterford sub-heading within Section 5.4 (Sub-area scenarios), in light of the preceding discussion of strategic factors (Section 5.2) and site options (Section 5.3) as well as in light of the preceding discussion of scenarios for other sub-areas (i.e. higher order settlements) within Section 5.4. The omission site in question is discussed under the Great Chesterford sub-heading within Section 5.4.
ANON-QNH5-RDHK-5	Jackie Deane - Parish Clerk	On behalf of an Organisation	Takeley Parish Council	Sustainability Appraisal - Great Dunmow	The SA identifies that there is an Infrastructure deficit in Great Dunmow as a result of recent house building. This highlights the importance of a plan led approach and only through allocations in this plan can the infrastructure deficit identified for Great Dunmow be addressed. Unfortunately, this plan does not tackle the existing infrastructure deficit in Great Dunmow. The SA discounts a number of sites for Great Dunmow, however two in particular have significant potential and should have been considered further.	The decision on sub-area scenarios for Great Dunmow to progress to the RA growth scenarios (specifically, three sub-area scenarios), was reasonable in light of the process set out across Section 5, also recognising the context to defining RAs set out within Section 4. In particular, key analysis is presented under the Great Dunmow sub-heading within Section 5.4 (Sub-area scenarios), drawing upon preceding Section 5.2 (Strategic factors) and Section 5.3 (Site options). The concluding discussion within this section notably states at para 5.4.66: “No other omission sites stand-out as being ‘of note’ at the current time, i.e. in the context of the current Local Plan (given the strategic factors discussed in Section 5.2)...”
ANON-QNH5-RDN8-R	Great Dunmow Town Council	On behalf of an Organisation	Great Dunmow Town Council	Sustainability Appraisal - Great Dunmow Town Council	The analysis of alternative sites at Great Dunmow is limited and, in some cases, entirely absent. Evidence base limitations such that the appraisal of RA growth scenarios was biased.	The decision on sub-area scenarios for Great Dunmow to progress to the RA growth scenarios (specifically, three sub-area scenarios), was reasonable in light of the process set out across Section 5, also recognising the context to defining RAs set out within Section 4. In particular, key analysis is presented under the Great Dunmow sub-heading within Section 5.4 (Sub-area scenarios), drawing upon preceding Sections 5.2 (Strategic factors) and 5.3 (Site options). Evidence base limitations are an inevitability. Careful consideration was given to having to overcoming evidence base limitations as part of work to define and appraise RA growth scenarios. In respect of Great Dunmow, it is accepted that evidence base work was undertaken in support of the emerging preferred option that was not taken in support of either of the two alternative approaches also explored through the appraisal of RA growth scenarios. It is also the case that the emerging approach was evidenced through the Regulation 18 consultation.
ANON-QNH5-RDC8-D	Matthew Thomas	On behalf of an Organisation	CODE Development Planners on behalf of G W Balaam & Son	Sustainability Appraisal - larger villages	The reasonable alternative (RA) growth scenarios defined within the SA Report (Section 5) and then appraised (Section 6) should have varied in respect of the approach to growth at villages.	The decision to hold the ‘Larger Villages’ sub-area constant across the RA growth scenarios was reasonable in light of the process set out across Section 5 of the SA Report, also recognising the context to defining RAs set out within Section 4. Specifically, a final decision is reached under the Larger Villages sub-heading within Section 5.4 (Sub-area scenarios), in light of the preceding discussion of strategic factors (Section 5.2) and site options (Section 5.3) as well as in light of the preceding discussion of scenarios for other sub-areas (i.e. higher order settlements) within Section 5.4. We do not agree that the SA has “simply” focused on the top two tiers of the hierarchy. Rather, the decision to vary the approach to growth for some sub-areas and not others was made in light of a process that we believe to have been more than proportionate, including recalling that part of the process involved consultation on a full draft local plan and an Interim SA Report (presenting all of the information required of the SA Report) under Regulation 18, with all consultation responses then accounted for in 2024 when refining our understanding of RAs.
ANON-QNH5-RDZN-T	Fiona Martin	On behalf of an Organisation	Natural England	Sustainability Appraisal - Natural England	Having reviewed the Sustainability Assessment that supports the Regulation 19 consultation of the Uttlesford new Local Plan, Natural England is satisfied that there are no reasonable alternatives to the one growth scenario proposed in the SA for the village of Takeley, as the alternatives discussed in the SA would not meet local and district objectives	Responded noted and supported.



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ANON-QNH5-RDAH-U	Steven Butler	On behalf of an Organisation	Vistry Group (Thaxted)	Sustainability Appraisal - NE Thaxted	<p>In the Sustainability Appraisal, all the reasonable growth scenarios that included Thaxted performed well...”</p> <p>Paragraph 7.7.1 states “at Thaxted there is a clear case for growth, other than in respect of the primary school viability issue”. This could be addressed by relocating and expanding Thaxted Primary School onto this development site, whilst re-allocating the existing Thaxted Primary School site for an alternative use, for example residential. That would address this issue.</p> <p>This also runs contrary to the Sustainability Appraisal that was prepared in support of the regulation 18 Draft Local Plan which stated in respect of Thaxted that “Nil strategic growth is ruled out as unreasonable on balance, including given the need to support the viability of services and facilities at Thaxted (including bus services), more generally, provide for locally arising housing needs (including affordable housing) and support the vitality of the village.</p>	<p>On the first point, we would wish to clarify that the appraisal of RA growth scenarios within the SA Report (Section 6) does not reach overall conclusions on any of the scenarios. Rather, the aim is to reach conclusions on the merits of the scenarios under each of the SA topics in turn.</p> <p>On the second point, the point on the primary school issue is noted. Work to define and appraise RA growth scenarios was undertaken on the basis of the best available evidence.</p> <p>On the third point, we would just wish to clarify that the evidence base / understanding in respect of growth-related issues and opportunities at Thaxted evolved notably following the Regulation 18 consultation in 2023.</p>
ANON-QNH5-RD1S-P	Andrew Martin	On behalf of an Organisation	S. Robinson Farms Ltd	Sustainability Appraisal - New settlement	<p>It would be reasonably feasible for the SA and draft Plan to have considered a mix of smaller allocations, as extensions to the more sustainable settlements, plus one or more smaller garden communities... The SA should be the subject of an addendum to assess another reasonable alternative that has not been considered as outlined above and included in the representations submitted in response to Chapters 4 and 6 of the Reg.19 Local Plan.</p>	<p>With regards to defining reasonable alternatives, this must be guided by the plan objectives, an understanding of the plan period, strategic factors including housing need and understanding of infrastructure issues and opportunities. All of these strategic factors fed into a conclusion that there is no reasonable growth scenario involving allocation of a new settlement (at the current time; N.B. a new settlement did feature in the RA growth scenarios at Reg 18), but the decision was also made in light of proportionate consideration of new settlement options.</p>
ANON-QNH5-RDMM-C	Christine Griffin	On behalf of an Organisation	Newport Parish Council	Sustainability Appraisal - Newport	<p>The assessment of recent growth in Newport is incorrectly evidenced on pg 38 in the Sustainability Appraisal which states that: “Newport: completions since the start of the plan period and commitments are relatively low (151 homes in total) and it appears there was limited housing growth over the preceding 20 years.” This is not accurate. The village experienced substantial growth between 2011-2020 with 406 dwellings delivered in the period 2011-2020 which is a 42% increase. The period 2021-2024 saw a further 151 dwellings approved</p>	<p>Response noted regarding the housing delivery data prior to the beginning of the plan period, and since.</p>
ANON-QNH5-RD7K-M	David Poole	On behalf of an Organisation	Weston Homes	Sustainability Appraisal - North Takeley allocation	<p>The SA is “vulnerable in terms of its assessment of all alternatives, and the higher growth options identified within the SA should be robustly considered as reasonable alternatives...”</p>	<p>The decision on RA growth scenarios, was reasonable in light of the process set out across Section 5, also recognising the context to defining RAs set out within Section 4.</p> <p>As set out in Section 5.2 (Strategic factors) there are certain ‘top down’ arguments for remaining open to higher growth scenarios, but a final decision on RA growth scenarios must also be made in light of ‘bottom up’ work to explore supply options, which the SA Report does through the analysis presented in Section 5.3 (Site options) and Section 5.4 (Sub-area scenarios).</p> <p>The highest growth scenario ultimately defined (Section 5.5), appraised (Section 6) and published (under Regulation 19) would involve total supply amounting to LHN plus 18%, which is demonstrably reasonable in light of the process set out across Section 5 of the SA Report. As part of this, it is important to recall that RA growth scenarios involving total supply up to LHN + 20% were appraised and consulted upon under Regulation 18, yet despite this no requests were made to the Council by any neighbouring authority in respect of provision for unmet need.</p>
ANON-QNH5-RD1Z-W	Guy Kaddish	On behalf of an Organisation	Bidwells LLP on behalf of Grosvenor Property UK Ltd and Hill Residential Ltd	Sustainability Appraisal - North Uttlesford Garden Community	<p>The SA’s commentary gives a number of reasons why GCs are not considered (para 5.2.34-39). However these do not withstand basic scrutiny... In short, all of the reasons set out in the SA for not considering an option[s] which considers new settlements/GCs are not in any way robust... The SA fails to take into account any scenario involving new settlements, which would have been a reasonable alternative.</p>	<p>With regards to defining reasonable alternatives, this must be guided by the plan objectives, an understanding of the plan period and strategic factors including housing need and understanding of infrastructure issues and opportunities. All of these strategic factors fed into a conclusion that there is no reasonable growth scenario involving allocation of a new settlement (at the current time; N.B. a new settlement did feature in the RA growth scenarios at Reg 18), but the decision was also made in light of proportionate consideration of new settlement options.</p> <p>With regards to the new settlement option in question, it is discussed under the Great Chesterford sub-heading</p>



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						within Section 5.4 (Sub-area scenarios) informed by the preceding discussions within Section 5.2 (Strategic factors) and Section 5.3 (Site options). It is recognised that the site warrants ongoing consideration, and this is made clear (including within Table 5.12); however, on balance the decision was reached that the site does not warrant being taken forward to the RA growth scenarios (and, in turn, does not warrant allocation).
ANON-QNH5-RD1H-B	Matthew Thomas	On behalf of an Organisation	CODE Development Planners on behalf of G W Balaam and Son	Sustainability Appraisal - Northwest of Clavering	The reasonable alternative (RA) growth scenarios defined within the SA Report (Section 5) and then appraised (Section 6) should have varied in respect of the approach to growth at villages.	<p>The decision to hold the ‘Larger Villages’ sub-area constant across the RA growth scenarios was reasonable in light of the process set out across Section 5 of the SA Report, also recognising the context to defining RAs set out within Section 4.</p> <p>Specifically, a final decision is reached under the Larger Villages sub-heading within Section 5.4 (Sub-area scenarios), in light of the preceding discussion of strategic factors (Section 5.2) and site options (Section 5.3) as well as in light of the preceding discussion of scenarios for other sub-areas (i.e. higher order settlements) within Section 5.4.</p> <p>We do not agree that the SA has “simply” focused on the top two tiers of the hierarchy. Rather, the decision to vary the approach to growth for some sub-areas and not others was made in light of a process that we believe to have been more than proportionate, including recalling that part of the process involved consultation on a full draft local plan and an Interim SA Report (presenting all of the information required of the SA Report) under Regulation 18, with all consultation responses then accounted for in 2024 when refining our understanding of RAs.</p>
ANON-QNH5-RDAQ-4	James Firth (Agent)	On behalf of an Organisation	Bower Croft Ltd and Oaks Croft Ltd	Sustainability Appraisal - Rural Area	<p>The SA does not provide sufficient clarity regarding alternative spatial strategies that could avoid or mitigate environmental harm. Indeed, the SA confirms that simply achieving an up-to-date local plan is key and therefore discounts the potential for a new settlement to be part of the strategy when clearly they are intended to be part of a longer term strategy going forward.</p> <p>The appraisal work presented within the SA Report lacks rigour, notably around its discussion of the environmental impacts of directing growth to the southern part of the District.</p> <p>It is also noted that the adequacy of the SA was highlighted as a problem with the last withdrawn Plan. It is notable, that the past SA considered very different growth options to the current SA. This suggests inconsistency in approach and in fact that the SA has been designed to fit the Plan rather than inform it.</p>	<p>With regards to defining reasonable alternatives, this must be guided by the plan objectives, an understanding of the plan period and strategic factors including housing need and understanding of infrastructure issues and opportunities. All of these strategic factors fed into a conclusion that there is no reasonable growth scenario involving allocation of a new settlement (at the current time; N.B. a new settlement did feature in the RA growth scenarios at Reg 18), but the decision was also made in light of proportionate consideration of new settlement options.</p> <p>On the appraisal point, the appraisal was informed by detailed consideration of wide-ranging evidence, including Regulation 18 consultation responses. Within the Interim SA Report published at the Regulation 18 stage detailed work was undertaken to explore issues and options, which generated consultation responses that then fed into subsequent work.</p> <p>On the final point, it is unclear whether this is referring to work presented within the Interim SA Report (2023) or work undertaken in previous years in a very difficult context. We do not follow or agree with the final point on what the alleged inconsistency serves to suggest.</p>
ANON-QNH5-RDAN-1	T Dodkins	On behalf of an Organisation	Lands Improvement Holdings	Sustainability Appraisal - South East Great Dunmow	The SA fails to fully assess all potential constraints, and in many cases misinterprets its own evidence base. This has led to mis-weightings given to certain constraints and opportunities that has skewed the case for growth in particular locations. Example of this include skewed and inconsistent landscape assessment of each site including the lack of landscape assessment of the newly introduced 017 site; failing to give weight to clear heritage constraints at Church End; a failure to consider flood risk in the SA; a failure to consider the importance and location of existing employment sites; an acknowledged failure to consider properly the infrastructure requirements to ensure deliverability/viability of the allocations; and a failure to consider fully the transport impacts and cost of delivering in constrained locations such as Church End.	The site in question is explored in detail as part of the appraisal of RA growth scenarios (Section 6 of the SA Report). On landscape, the first point to make is that evidence-base limitations are an inevitability. Secondly, we note that the representation elsewhere states that the appraisal “offers a very brief but apparently balanced view in para 6.2.74 between the Dunmow options.” On heritage, the appraisal is clear regarding the degree of constraint affecting the proposed allocations at NE Great Dunmow (including Church End). On flood risk, this is not correct. On economy/employment, the appraisal highlights the case for a focus of growth at the omission site in question. On infrastructure, we are not entirely clear on the point being made; and transport we would wish to highlight that the appraisal of RA growth scenarios includes a detailed discussion of growth-related issues and potential opportunities at Great Dunmow.
ANON-QNH5-RD97-2	Lydia Sadler	On behalf of an Organisation	Stansted Airport Limited	Sustainability Appraisal - Stansted Airport Limited	Following on from STAL Reg 18 submission, we note that the Sustainability Appraisal Report 2024 continues to make only limited reference to noise from aircraft arriving and departing from Stansted Airport. The SA Growth Strategy review does, however, acknowledge the location of Thaxted within the noise contours and highlights that development policies should seek to avoid development in areas where	We sought to draw upon the available evidence as far as possible. We would be happy to discuss further the available evidence and how this should be interpreted, with a view to influencing the location of future development.

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					noise could be an issue. Noise is an important consideration in managing and planning for development and avoidable conflicts with the airport’s already approved levels of operation and we would normally expect aircraft noise and the associated noise contours to run through the Sustainability Appraisal influencing the location of future development.	
ANON-QNH5-RDWK-M	Neil Waterson	On behalf of an Organisation	Neil Waterson on behalf of Adrian Fox City and Country	Sustainability Appraisal - Stansted Mountfitchet	Comment to object to the process the Council has taken in respect of determining and assessing its reasonable alternatives, and in particular the approach it has taken to the Green Belt... Stansted Mountfitchet and Birchanger are two of the most sustainably located settlements in the District... It is therefore inconceivable that the Sustainability Appraisal does not give any consideration as to whether if these sites were to be released from the Green Belt, they would contribute towards the achievement of sustainable development and at the very least considered as reasonable alternatives.	A decision on RA growth scenarios is reached within Section 5.5 of the SA Report in line of a process reported across preceding Sections 5.2 (Strategic factors), 5.3 (Site options) and 5.4 (Sub-area scenarios). Green Belt designation naturally fed into the process, but it is not the case that Green Belt sites were ruled out without due consideration. For example, see the discussion of growth options / scenarios under the Stansted Mountfitchet and Hatfield Heath sub-headings within Section 5.4.
ANON-QNH5-RD3M-J	Adam Davies	On behalf of an Organisation	Ceres Property on behalf of Richard Martin M Scott Properties Ltd	Sustainability Appraisal - Stansted Mountfitchet Green Belt	The concern in respect of this omission site is that: “Clearly, it is the Site’s Green Belt designation that appears to be the only reason why it has not been included as an allocation, yet the SA has not properly assessed whether exceptional circumstances are in fact demonstrated by the proposed allocation and its associated benefits.”	The decision not to progress this site to the RA growth scenarios, as appraised in Section 6 of the SA Report, was reasonable in light of the process set out across Section 5, also recognising the context to defining RAs set out within Section 4. In particular, key analysis is presented under the Stansted Mountfitchet sub-heading within Section 5.4 (Sub-area scenarios), drawing upon preceding Sections 5.2 (Strategic factors) and Section 5.3 (Site options). Within this section the omission site in question is discussed alongside other sites in contention for allocation, before a decision is reached to hold the approach to growth at Stansted Mountfitchet constant across the RA growth scenarios (i.e. to progress only one sub-area scenario). This decision was reached on balance, noting there is a strategic argument for remaining open to higher growth at Stansted Mountfitchet, as set out at paragraph 5.4.92. However, there is no clear basis for suggesting that the omission site in question would be a first or early port of call in order to deliver higher growth, including due to exceptional circumstances being required. Finally, the following statements are not accurate: <ul style="list-style-type: none"> <li>• “As set out at paragraph 5.2.38 of the SA it actually appears that it is the Council’s intention for the Plan to only cover the period to 2031, five years from adoption rather than 15 years.”</li> <li>• “The current submission version of the Plan arguably is not in fact a plan, but simply an acknowledgement of already committed development...”</li> </ul>
ANON-QNH5-RD13-P	Rachel Bryan	On behalf of an Organisation	Rachel Bryan on behalf of The Hargrove Family	Sustainability Appraisal - Takeley constant	The Sustainability Appraisal tests five growth scenarios; however, all assume 1,546 dwellings at Takeley. It does not appear that higher growth has been tested through the 2024 Sustainability Appraisal, although a higher quantum of 1,636 dwellings was tested through the 2023 Sustainability Appraisal and found to be appropriate. It is not clear why the quantum of growth at Takeley has been reduced from that proposed in the Regulation 18 plan nor why the 2024 Sustainability Appraisal tested 1,546 dwellings yet only 1,506 are proposed for allocation. The scale of the allocation would appear to be based solely on the capacity of the sites chosen for allocation.	The decision to hold the Takeley sub-area constant across the RA growth scenarios was reasonable in light of the process set out across Section 5 of the SA Report, also recognising the context to defining RAs set out within Section 4. Specifically, a final decision is reached under the Takeley sub-heading within Section 5.4 (Sub-area scenarios), in light of the preceding discussion of strategic factors (Section 5.2) and site options (Section 5.3) as well as in light of the preceding discussion of scenarios for other sub-areas (including higher order settlements) within Section 5.4.
ANON-QNH5-RDRZ-X	Takeley Street Residents Group	On behalf of an Organisation	Takeley Street Residents Group	Sustainability Appraisal - Takeley Residents Association	The SA Report “simply rules out a garden community...” “The Sustainability Appraisal states that the plan sets out to “remedy issues” that have arisen by not having a plan. In other words, it intends to build on the “piecemeal development” that has occurred since Uttlesford’s failure to deliver a 5 year housing supply.” Disagree with the following statement at 5.5.12 of the SA Report: “Finally, with regards to employment land allocations, .....the combined	With regards to defining reasonable alternatives, this must be guided by the plan objectives, an understanding of the plan period, strategic factors including housing need and understanding of infrastructure issues and opportunities. All of these strategic factors fed into a conclusion that there is no reasonable growth scenario involving allocation of a new settlement (at the current time; N.B. a new settlement did feature in the RA growth scenarios at Reg 18), but the decision was also made in light of proportionate consideration of new settlement options. On the second point, we disagree that seeking to deliver growth in a way that secures infrastructure amounts

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					effect is a modest oversupply in respect of industrial/logistics but it is not possible to envisage any reasonable alternative”.	to building upon past piecemeal development. Finally, with regards to employment land, the decision to hold the approach to employment land constant across the RA growth scenarios (Section 5.5) was made in light of the preceding process set out across Sections 5.2, 5.2 and 5.4 and also in light of the discussion in Section 4. In particular, key analysis is presented under the Takeley sub-heading within Section 5.4.
ANON-QNH5-RDWU-X	Tara Lewis	On behalf of an Organisation	DLP Planning Ltd on behalf of Salacia Ltd	Sustainability Appraisal - Thaxted	The Sustainability Appraisal appears to make justifications against Thaxted in terms of accessibility (to community infrastructure), but these are not settlement/site specific, only the general comments being on Primary school viability. There is a clear disconnect between the scoring of the scenarios, how each scenario has been assessed by the plan-maker, and how the conclusion to proceed with scenario 1 has been made. Indeed, the Sustainability Appraisal cites ‘Under several topic headings there are scenarios that outperform Scenarios 1 and 3, and the Council, as decision maker, might choose to give particular weight to one or more of these topics’. One must therefore assume that the Council has assigned more importance and weight to certain criteria of the scoring. But there is a clear lack of explanation of this weighting exercise, so the result of the testing is not justified.	Primary school capacity is a key Thaxted-specific issue. See Section 7 of the SA Report for the plan-maker’s reasons for supporting Scenario 1 in light of the preceding appraisal of RA growth scenarios.
ANON-QNH5-RDAY-C	Samuel Bampton	On behalf of an Organisation	Pelham Structures Ltd	Sustainability Appraisal - Ugley Garden Community	In the 2024 SA it goes on to state the following “In conclusion, at this stage there is considered to be just one reasonable growth scenario that warrants being progressed, which is broadly the preferred approach from the Regulation 18 Draft Plan stage. Whilst detailed work was undertaken to explore RA growth scenarios in 2023 (see the ISA Report), this was predicated on a view that there were significant challenges locally around primary school capacity. In the first part of this repeats one of our primary concerns was that the SA process has not evaluated what are likely to be the most appropriate scenarios, instead they have assessed contrived combinations that serve only to justify what appears to be a predetermined end. The second reason for rejection seems to be due to there being inadequate primary school capacity in the area. This is strange issue to have when the Bollington Hall Garaden Village is likely to be the only way to resolve this issue. As it would provide a new Primary School whereas the smaller allocations currently proposed to Stansted wouldn’t but would put further pressure on the limited school places. This would seem a strong reason to support this alternative growth option that the Reg 18 SA scored highly.	The quote is taken from the Stansted Mountfitchet sub-section within Section 5.4 of the SA Report (Sub-area scenarios). It is a key concluding statement reached on the basis of a process explained across preceding Sections 5.2 (Strategic factors) and 5.3 (Site options) and across the preceding paragraphs dealing with Stansted Mountfitchet sub-area scenarios in Section 5.4. As such, we reject the suggestion that the quote is in any way suggestive of a contrived process. The point on primary school capacity is misunderstood. On the final point, we would wish to clarify that the appraisal of RA growth scenarios previously presented within the Interim SA Report (2023; specifically, see Section 6 of that report) did not reach overall conclusions on any of the scenarios. Rather, the aim was to reach conclusions on the merits of the scenarios under each of the SA topics in turn.
ANON-QNH5-RD3N-K	Val Waring	Individual / member of the public		Takeley - Tile Kiln	The respondent questions the mitigation scheme at Tile Kiln Green, which is the access from Great Hallingbury to the B1256 and M11 junction 8 roundabout. The respondent questions the effectiveness of traffic lights at Tile Kiln Green and believes the budget of £10,000 for the lights is severely underestimated.	The transport evidence base prepared in support of the emerging Uttlesford Local Plan forms a robust and detailed analysis of the current and forecast future performance of the transport network across the district and beyond. It provides a proportionate analysis of future demand that will be placed on the network due to Local Plan development, and the interventions required to mitigate the impacts on local communities. The evidence is under pinned by the development of two transport models which were built in accordance with Department for Transport (DfT) TAG guidance, whilst also meeting the requirements of the National Planning Policy Framework (NPPF). The Council is satisfied that the transport assessment evidence and survey data that underpins the assessment was undertaken in line with the relevant guidelines issued at the time. Caution was taken when considering the modelling outputs from the baseline data, and comparisons were drawn with pre-COVID data. To ensure a robust assessment, 2021 Base flows were factored up during the forecasting to account for this.



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						<p>The suggested intervention at Tile Kiln Green forms part of a comprehensive approach to traffic management along the B1256 and J8 of M11. The Local Plan evidence base in relation to this junction will be supplemented through more detailed analysis of site specific or junction issues as and when individual allocation sites come forwards through the planning process.</p> <p>The comprehensive suite of transport evidence also includes a consideration of sustainable transport in the District including a full assessment of sustainable transport opportunities, a Local Cycling and walking Infrastructure Plan, the potential for public transport enhancements in the A120 corridor and consideration of how ‘Shared Transport’ schemes can be delivered on large scale development sites.</p>
ANON-QNH5-RDRZ-X	Takeley Street Residents Group	On behalf of an Organisation	Takeley Street Residents Group	Takeley Street objection to employment evidence	Representation from Takeley Street Residents Group that asserts that the employment evidence base is not robust. Posits that Northside should be allocated to meet the need in full. Concerned that the evidence base is out of date as the ELR builds on previous ELRs. Objects to the headroom in the supply.	<p>The Employment Needs Update Report is considered a robust and sound technical piece of evidence that underpins the spatial strategy and employment site selection process for the Local Plan, produced by specialist consultants that are experts in their fields having supported numerous councils with producing sound local plans.</p> <p>The employment evidence takes into account the latest available monitoring evidence, with the Northside permission used in the Employment Needs Update.</p> <p>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. Table 4.6 of the Local Plan provides more information, with a 1st April 2024 base date.</p> <p>Regarding the overall need and spatial distribution, 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 Employment Site Selection Topic Paper updates these figures taking into account the latest completions and commitments figures, resulting in a residual need of 31.5ha. The Reg 19 draft makes provision for 36ha of industrial land at Great Dunmow and Takeley, plus a further 2.5ha at Saffron Walden which comfortably exceeds the requirement. It is considered that the allocation on the B1256 and A120 junction west of Great Dunmow is well-located for both the wider Stansted area and also Great Dunmow itself.</p> <p>The Employment Land Review 2024 uses previous assessments to identify the list of sites to be assessed, but is a standalone document in its own right based on site visits and up-to-date information.</p> <p>Finally, regarding the decision for the plan to have ‘headroom’ in the supply, this is a policy-on approach to ensure that the needs are met in full. To plan for a level of contingency is considered positive planning.</p>
ANON-QNH5-RDTF-C	Alan Carter	Individual / member of the public		Transport - A120 Corridor	<p>The Respondent notes the flaws in assessing A120 traffic volumes. The A120 Corridor Assessment understates the transport issues around Stansted Airport. The traffic assessment was undertaken as the UK was leaving the Covid 19 Lockdown and therefore the traffic movements are not accurate and don’t reflect the normal traffic movements around the airport. As such adjustments should be made based on national statistical evidence. The modelling of A120 traffic flows nonetheless noted severe issues around the airport, and M11 junction 8, but the plan proposes the majority of commercial and industrial development along this corridor. National Highways have completed two junction improvements around M11 junction 8 to improve flows to the roundabout from the west. Both of these have served to reduce the capacity of the strategic junction to accommodate local traffic from Takeley/ Dunmow entering Junction 8 from the east.</p> <p>The A120 Corridor Assessment has not properly modelled the traffic flows between Great Dunmow and the B1256 and A120 Dunmow West junction, and specifically the length between the Woodlands Way (</p>	<p>The transport evidence base prepared in support of the emerging Uttlesford Local Plan forms a robust and detailed analysis of the current and forecast future performance of the transport network across the district and beyond. It provides a proportionate analysis of future demand that will be placed on the network due to Local Plan development, and the interventions required to mitigate the impacts on local communities.</p> <p>The evidence is under pinned by the development of two transport models which were built in accordance with Department for Transport (DfT) TAG guidance, whilst also meeting the requirements of the National Planning Policy Framework (NPPF).</p> <p>The Council is satisfied that the transport assessment evidence and survey data that underpins the assessment was undertaken in line with the relevant guidelines issued at the time. Caution was taken when considering the modelling outputs from the baseline data, and comparisons were drawn with pre-COVID data. To ensure a robust assessment, 2021 Base flows were factored up during the forecasting to account for this. The Land at Highwood Quarry (UTT/24/0213/FUL) permission of up to 1200 homes was included in the Reg.19 Modelling.</p> <p>The Local Plan evidence base will be supplemented through more detailed analysis of site specific issues as and when individual allocation sites come forwards through the planning process.</p> <p>The comprehensive suite of transport evidence also includes a consideration of sustainable transport in the District including a full assessment of sustainable transport opportunities, a Local Cycling and walking</p>



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					Western Dunmow bypass) / B1256 and The A120/B1256 Dunmow West interchange. The area to the West of Dunmow includes two primary schools, the site of the relocation of a secondary school, and a third primary school. Work has started on the latter two, which are will generate significant traffic. Significant housing and a new supermarket is also proposed along the B125. This has not been modelled properly. More development is proposed along part of the route. Despite the stretch of the B1256 road showing the biggest peak time traffic increases anywhere in the report, the plan of traffic speed modelling locations specifically excludes this stretch of road, which will continue to be the main route between the Town, the airport, and the M11/London-Cambridge employment and growth corridors. The plan needs to be remodelled with base data that reflects the impact of the airport on the south of the Uttlesford district, and the impact of committed developments on the Western side of Dunmow.	Infrastructure Plan, the potential for public transport enhancements in the A120 corridor and consideration of how ‘Shared Transport’ schemes can be delivered on large scale development sites.
ANON-QNH5-RDCA-P	Louise Howles	Individual / member of the public		Transport - Traffic Impacts in Great Dunmow	In relation to the A120 Corridor Study, timing of Traffic Surveys in Great Dunmow: St Edmund’s Lane/Braintree Road area is not reflective of normal commuting/school run movements. The council has therefore started its baseline from a very inaccurate and out of date view. The traffic survey in July 2021 was impacted by Covid restrictions and also included a week of school holidays. Therefore, the se traffic surveys are not in any way an accurate assessment of normal traffic volumes in the local area, particularly in regard to St. Edmunds Lane, Braintree Road and the B1256 in Great Dunmow. An accurate traffic survey is important given the high reliance of private vehicles in Uttlesford. Further forecasts of the impact of development is taken from the traffic survey data produced, so how can this be concluded as a sound forecast when the baseline volumes are not an accurate view of normal travel behaviour. The traffic surveys completed in the area are not up to date when considering the recent significant development that has taken place on the east side of St Edmunds Lane. The modelling does not take into consideration a recent permission granted in July 2024 (UTT/24/0213/FUL). The access point of this site is on the Braintree Road stump, flowing into Braintree Road, just 30 metres from the B1256 intersection. This will cause significant additional traffic which has not been taken into consideration. The surveys and Routes do not include an assessment of what is most likely to be the most heavily used route from Dunmow Site 2 A to get to the B1256 on the eastern side of the town. The only transport route assessment done in this area is Route 12, which makes an assumption that traffic for the B1256 will turn right at the end of St Edmunds Lane, egress towards the town centre, then turn left along Chelmsford Road (B1008) and join the southern spur of the B1256. This shows a lack of knowledge of the local area and an understanding of commuting traffic behaviour. The majority of traffic at commuting times goes in the direction of Ford Farm to access the B1256. The modelling does not acknowledge that there is a weak bridge at Church End. This road is unsuitable to accommodate an increase in traffic volume or HGVs in the area. It has been acknowledged that increased traffic is expected at peak times at St Edmund’s Lane/Braintree Road intersection. This would increase noise and pollution for local residents.	The transport evidence base prepared in support of the emerging Uttlesford Local Plan forms a robust and detailed analysis of the current and forecast future performance of the transport network across the district and beyond. It provides a proportionate analysis of future demand that will be placed on the network due to Local Plan development, and the interventions required to mitigate the impacts on local communities. The evidence is under pinned by the development of two transport models which were built in accordance with Department for Transport (DfT) TAG guidance, whilst also meeting the requirements of the National Planning Policy Framework (NPPF). The Council is satisfied that the transport assessment evidence and survey data that underpins the assessment was undertaken in line with the relevant guidelines issued at the time. Caution was taken when considering the modelling outputs from the baseline data, and comparisons were drawn with pre-COVID data. To ensure a robust assessment, 2021 Base flows were factored up during the forecasting to account for this. The Land at Highwood Quarry (UTT/24/0213/FUL) permission of up to 1200 homes was included in the Reg.19 Modelling. The Local Plan evidence base will be supplemented through more detailed analysis of site specific issues as and when individual allocation sites come forwards through the planning process. The comprehensive suite of transport evidence also includes a consideration of sustainable transport in the District including a full assessment of sustainable transport opportunities, a Local Cycling and walking Infrastructure Plan, the potential for public transport enhancements in the A120 corridor and consideration of how ‘Shared Transport’ schemes can be delivered on large scale development sites.

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					There has not been an assessment on the impact that development would have on traffic volumes at the Braintree Road/B1256 intersection at Ford Farm. There is no proposal for a new link road/arterial road to be provided along with this site either to the north-west of it to link with the B1008 or B184, nor to the east of the site directly linking with the B11256 (east of Merks Hill woods).	
ANON-QNH5-RDAH-U	Steven Butler	On behalf of an Organisation	Vistry Group (Thaxted)	Transport - Transport Evidence Paper Thaxted	Vistry group confirm that the Transport Evidence Topic Paper prepared in support of the regulation 18 draft Local Plan confirmed that any impacts arising in Thaxted could be mitigated. A total of three junctions were assessed within Thaxted, selected based on proximity to the proposed allocation sites and their importance to the wider road network.	Noted
ANON-QNH5-RDNM-D	Graham Mott	On behalf of an Organisation	Elsenham Parish Council	Transport Evidence - Elsenham	The respondent criticises the range of Transport Evidence for not having any substantive recommendations for Elsenham. On Sustainable Transport - LCWIP Report largely overlooks Elsenham, mentioning it only in relation to the station. The Summary, Recommendations, and Appendix D do not address Elsenham. The Transport Evidence Topic Paper shows Elsenham is not considered in LCWIP plans. The Elsenham Area Profile incorrectly references multiple primary schools, and there are no safe cycling connections to Stansted Mountfitchet. Proposed transport improvements for Elsenham are vague and minimal. The A120 Corridor Assessment and other sections minimally address Elsenham, focusing more on Stansted Mountfitchet. There is no strategic cycle route from Elsenham to Stansted Airport, and the bus service is inadequate for shift workers. Transport assessments often overlook Elsenham, leading to increased delays and longer journey times due to constrained routes and new housing developments.	The transport evidence base prepared in support of the emerging Uttlesford Local Plan forms a robust and detailed analysis of the current and forecast future performance of the transport network across the district and beyond. It provides a proportionate analysis of future demand that will be placed on the network due to Local Plan development, and the interventions required to mitigate the impacts on local communities. The evidence is under pinned by the development of two transport models which were built in accordance with Department for Transport (DfT) TAG guidance, whilst also meeting the requirements of the National Planning Policy Framework (NPPF). The Council is satisfied that the transport assessment evidence and survey data that underpins the assessment was undertaken in line with the relevant guidelines issued at the time. Caution was taken when considering the modelling outputs from the baseline data, and comparisons were drawn with pre-COVID data. To ensure a robust assessment, 2021 Base flows were factored up during the forecasting to account for this. The transport evidence and suggested interventions in Elsenham are considered appropriate and proportionate for the scale and nature of development proposed in the village. The Local Plan evidence base in relation to the strategic allocation will be supplemented through more detailed analysis of site specific or junction issues as and when individual allocation sites come forwards through the planning process. The comprehensive suite of transport evidence also includes a consideration of sustainable transport in the District including a full assessment of sustainable transport opportunities, a Local Cycling and walking Infrastructure Plan, the potential for public transport enhancements in the A120 corridor and consideration of how ‘Shared Transport’ schemes can be delivered on large scale development sites.
ANON-QNH5-RDAU-8	Alex Cole	On behalf of an Organisation	Pigeon (Takeley) Ltd	Transport Schemes - North of Taylors Farm	The Transport Topic Paper addresses the impact of Local Plan-related growth on the A120 and states that schemes are affordable and deliverable and proportionate to the level of growth. In relation to the land safeguarded to the east of Land North of Taylors Farm, it is not clear how justified this claim is. The scheme currently has no design, and scoping work is still required to assess the potential delivery of a potential junction. It is not possible to affirm that the scheme is either deliverable or affordable. The Transport Topic Paper claims that further studies may identify additional initiatives, despite saying that the interventions are themselves capable of addressing the level of growth. This caveat for further initiatives should not be applied if the proposed interventions are considered to be sufficient.	The transport evidence base prepared in support of the emerging Uttlesford Local Plan forms a robust and detailed analysis of the current and forecast future performance of the transport network across the district and beyond. It provides a proportionate analysis of future demand that will be placed on the network due to Local Plan development, and the interventions required to mitigate the impacts on local communities. The evidence is under pinned by the development of two transport models which were built in accordance with Department for Transport (DfT) TAG guidance, whilst also meeting the requirements of the National Planning Policy Framework (NPPF). The suggested interventions at the Taylors Farm strategic allocation constitute a reasonable high-level assessment of the mitigation schemes that could be delivered. However, the Local Plan evidence base will be supplemented through more detailed analysis of site specific issues as and when individual allocation sites come forward through the planning process. The comprehensive suite of transport evidence also includes a consideration of sustainable transport in the District including a full assessment of sustainable transport opportunities, a Local Cycling and walking Infrastructure Plan, the potential for public transport enhancements in the A120 corridor and consideration of how ‘Shared Transport’ schemes can be delivered on large scale development sites.
ANON-QNH5-RD7H-H	Charlote Cook	On behalf of an Organisation	SEGRO	Viability Assessment -	The Viability Assessment at Regulation 19 concludes that for employment schemes "the viability outcomes can be regarded as marginal at best overall" and goes on to note that sustainable	The Viability Assessment has informed the employment allocations in the Local Plan and the approach to development management policies. Policies within the plan - most notably Core Policy 5 - provide adequate flexibility to ensure delivery of the allocations is not held back due to viability issues.

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				employment development	construction (carbon reduction/energy efficiency) and BNG related policy requirements proposals are considered unlikely to tip an otherwise proceedable scheme into non-viability. Given the high-level nature of the assessment and marginal results (with no consistently clear viability prospects for employment development), it is important that viability is considered on a site-by-site basis to ensure that the policy requirements do not make a development undeliverable.	
ANON-QNH5-RDA3-6	Hyacynth Cabiles	On behalf of an Organisation	NHS Property Services (NHSPS)	Viability Assessment - Healthcare	NHS request a separate cost for health care facilities so they are clearly identified and can be assessed in collaboration with the NHS to ensure that the latest update health facility requirement is included in the community infrastructure contributions.	We note the NHS referee to including a specific amount for the health care contributions. Suggested that Policy will be amended in supporting text to emphasise need for contribution to health care and the floor space requirements for Takeley and Great Dunmow are specified. The applicant will need to follow the County Developers' contributions Guidance where implicit cost contributions are set out. The UDC Viability assessment included the cost of the two health facilities in the overall appraisal of the Plan and in individual site overview analyses.
ANON-QNH5-RDMM-C	Christine Griffin	On behalf of an Organisation	Newport Parish Council	Water Cycle Study - data sources	Newport Parish Council note that the expected growth identified for Newport in the Water Cycle Study does not accord with either the Regulation 18 or Regulation 19 Local Plan.	The Council acknowledges the Parish Council's comments on this aspect of the Water Cycle Study and will consider whether updates to the evidence base are required.
ANON-QNH5-RDMM-C	Christine Griffin	On behalf of an Organisation	Newport Parish Council	Water Cycle Study - Newport	Newport Parish Council note the Water Cycle Study's conclusions with regard to wastewater treatment capacity at Newport and the poor outcomes for local water quality when assessed against the Water Framework Directive. They suggest that development in Newport should be phased for later than 2030 to allow Anglian Water to secure the necessary upgrades to the Wastewater Treatment Centre at Newport in order for it to manage the additional 300 homes within the plan period. They request that a condition to this effect to be included within the Local Plan alongside a requirement for upgrades to be in place before homes are occupied.	The Local Plan sets a housing requirement of 300 homes at Newport, to be delivered on non-strategic allocations. This is expected to come forward through the Newport and Quandon and Rickling Neighbourhood Plan, although the Council will consider making site allocations if the Neighbourhood Plan has not been made within two years of the Local Plan's adoption. If allocations are made in the Neighbourhood Plan, the Parish Council should consult with infrastructure providers and work with site promoters to ensure that the phasing of development is aligned with any necessary infrastructure requirements. The Local Plan (Core Policy 34) requires proposals to demonstrate that sufficient wastewater treatment capacity exists to serve the proposed development, and encourages applicants to engage with wastewater undertakers early in the planning process so that any upgrade requirements can be identified. As set out in Core Policy 34, the Council impose conditions related to the occupation of new developments. It is not considered necessary to specify the precise phasing of new developments at Newport in the Local Plan, since this will be dependent on the scale and nature of development proposed.
ANON-QNH5-RDZN-T	Fiona Martin	On behalf of an Organisation	Natural England	Water Cycle Study - support	Natural England has expressed support for the integration of the Water Cycle Study recommendations into the Local Plan policies	Support noted