

Chapter 9: Transport, Environment and Climate

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Core Policy 22: Net Zero Operational Carbon Development

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
BHLF-QNH5-RDEH-Y	Essex County Fire and Rescue Service	On behalf of an Organisation	Essex County Fire and Rescue Service	Battery Energy Storage Systems (Essex County Fire and Rescue Services)	Essex County Fire and Rescue Services would like to be notified in cases where Battery Energy Storage Systems (BESS) are included, including on gridscale, domestic and commercial sites.	Noted. The Council will continue to work with Essex County Council for planning applications involving Battery Energy Storage Systems.
ANON-QNH5-RD1W-T	Zhanine Smith	On behalf of an Organisation	Essex County Council	BREAAM (Essex County Council)	ECC suggests deleting reference to 'BREAAM' in Paragraph 9.27 as it is not a route to policy compliance as noted in Appendix 10.	The Council considers the current policy wording to provide adequate clarity regarding the accepted alternative routes to meeting policy requirements.
ANON-QNH5-RDYU-Z	Louise Pepper	Individual / member of the public		Downstream Emissions from Fossil Fuel Extraction	The respondent refers to the Finch case Law and that downstream carbon emissions from fossil fuel expansion should be a material consideration within development proposals. They make particular reference to Stansted Airport Expansion.	The agreed expansion of Stansted Airport falls within Nationally Significant Infrastructure and forms part of the UK Government's growth agenda. This falls outside the scope of the Local Plan.
ANON-QNH5-RDWV-Y	Gary Spilman	Individual / member of the public		Energy Efficiency in Existing Buildings	The respondent suggests that Core Policy 22 does not include any measures to improve the energy performance of existing buildings.	Core Policy 22 Part B covers applications for residential extensions and conversions of existing buildings. These applications are expected to incorporate renewable energy generation technology and are expected to meet minimum standards for building fabric approach. Such proposals should be seen as opportunities to improve the energy efficiency and function of the building, and are regarded as important contributions to the net zero ambition. The details in Appendix 10 provide more advice and for heritage buildings applicants are advised to use the Essex Design Guide and Historic England guidance for best practice. This policy requirement will ensure that existing residential properties are more energy efficient. In addition, any proposals for existing buildings will be required to meet Building Regulations and any of the energy efficiency measures contained within.
ANON-QNH5-RD1W-T	Zhanine Smith	On behalf of an Organisation	Essex County Council	Energy Offset Fund (Essex County Council)	ECC are currently developing a Renewable Energy Offsetting Framework and therefore if it is UDC's intention to utilise the County fund it is essential emerging policy facilitates its expenditure appropriately. The criteria to guide the spending of the energy offset fund administered by ECC will be set out and agreed with participating local authorities. To enable flexibility in the spending of the energy offset fund administered by the ECC it is recommended the last sentence of the ** clause in Policy 22 be amended to state: “....PV renewable energy system elsewhere in the Plan area or County, which is able to generate a similar amount of energy) and be paid into the Council's offset fund	The Council considers the current policy wording provides adequate clarity regarding the routes of financial contribution and uses.
ANON-QNH5-RD1W-T	Zhanine Smith	On behalf of an Organisation	Essex County Council	Energy Use Intensity Limit - Exceptional Circumstances (Essex County Council)	Essex County Council suggest that reference to “in exceptional circumstances” in Requirement 3, point ii) weakens the policy approach since it is unclear what these exceptional circumstances might be, how a site wide average would be evidenced and demonstrated, what the implications are for future residents, and why a larger residential site would not be able to meet the policy. The Essex technical evidence provides proportionate evidence to demonstrate that meeting the EUI target of 35 kWh/m2/year on individual dwellings is feasible at reasonable cost on all the residential typologies modelled. ECC considers the clause introduces an unhelpful ‘loophole’ that may be exploited and cause delay. ECC state that they are currently developing a Renewable Energy Offsetting Framework and therefore if it is UDC's	The Council thanks Essex County council for their comments and proposed amendments. The Council will consider the proposed modifications further during examination following further discussion with a shared view to ensuring the policy requirements remain strong.

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					intention to utilise the County fund the emerging policy must facilitate its expenditure appropriately though the guidance criteria for the County energy offset fund will be agreed with participating local authorities.	
ANON-QNH5-RD1W-T	Zhanine Smith	On behalf of an Organisation	Essex County Council	Essex Policy Position and Evidence Base (Essex County Council)	Essex County Council suggests a number of clarifications to document title, status and hyperlinks to policy papers and evidence produced by Essex County Council, including: <ul style="list-style-type: none"> • Essex Net Zero Policy Planning Policy Position for Net Zero Carbon Homes and Buildings in Greater Essex – November 2023 • Essex Design Guide 	Noted. The Council has reviewed the updated status and hyperlinks to the Policy Papers identified and will propose modifications to the Plan to correct them.
ANON-QNH5-RDAU-8	Alex Cole	On behalf of an Organisation	Pigeon (Takeley) Ltd	Flexibility	SEGRO and Pigeon Investments agree with aspirations to deliver net-zero but in order to make it achievable policy wording should allow flexibility in targets if there were site-specific circumstances, tenancy arrangements or viability constraints that would make the policy requirement difficult to achieve. Amendments requested to policy requirements 1 to 5: <ul style="list-style-type: none"> • Requirement 1: Should be revised to provide further targets that are flexible for various sized units. • Requirement 3: clarify use class of light industrial being E(g). • Requirement 4: Request additional text: “Renewable energy must be generated on-site for all new developments (1 or more new dwellings or 100m2 or more non-residential floorspace) where technically feasible and space allows” to allow for circumstances as at Stansted Airport and uses within its boundary, where power is provided by the Airport and users cannot control its source or renewable credentials. The policy should clarify the cost of contributing to the Council’ offset fund and provide clarification that there may be circumstances where an off-site contribution is not appropriate. Core Policy 22 under Part B -Clarification on applications for residential and non-residential extensions and conversions affecting existing buildings.....”. The policy should clarify the cost of contributing to the Councils offset fund and provide clarification that there may be circumstances where an off-site contribution is not appropriate. Pigeon expresses concern over solar panels because excess energy can be generated but export to the grid is dependent on the available capacity in the local grid which can be a constraint unless there is significant grid reinforcement aligned with the delivery of housing and employment. They consider that policy should be more flexible and allow developers to design arrays that maximise panel utilisation and on-site consumption. 	The Council welcomes the support in principle for the policy. The targets have been devised based on considerable research by leading consultancies in the building energy field, and have been applied to policy in a similar manner in a growing number of the local plans. They need to be strict in order to work towards the overriding climate change targets, but it is acknowledged that the policy requirement can be subject to closer examination at the planning application stage if local or circumstances prevail including the arrangements of the offset fund. Regarding Requirement 1, there is no need to add flexibility for different units because this was tested in thorough research for the evidence base in order to draw together the policy. Developers would be expected to liaise with any network operator to understand grid capacity and connection. They would also be expected to maximise panel utilisation and ensure the most effective use of PV panels on a building. The requirement stating that solar PV energy generation matches the predicted energy use of the building is intended to ensure reliance on renewable energy to support the transition to net zero and the move away from fossil fuels. There may be clarification over the definition of ‘light industrial’ in Requirement 3 and over the application to residential and non-residential in Part B. The Local Plan is ambitious in its policies to ensure that Uttlesford District Council addresses the climate emergency and achieves its goal by being net zero by 2030. The UK Government is working towards being net zero by 2050 and given that the Local Plan covers a period up to 2041, the Council must start working towards this target in line with the UK Government plans. The Council wants to avoid making the policy too flexible that would then result in policy requirements not being met and the creation of a loophole within the policy. The Council will continue to work with local distribution network operators to understand grid capacity. A developer would also be expected to communicate with any network operators as part of developing the site to understand grid capacity and how the development would connect up to the local grid network. Core Policy 22 Requirement 4 requires the inclusion of solar PV panels, however, it is for the developer to maximise panel utilisation and ensure the most effective use of PV panels on a building. The requirement stating that solar PV energy generation matches the predicted energy use of the building will ensure that the building is solely reliant on renewable energy for electricity use. This will support the transition to net zero and the move away from fossil fuels. Solar panels with built in batteries could be considered by a developer which would minimise energy waste. The Council will consider the proposed amendments to Core Policy 22 but as stated above, relaxing any policy requirements could open up loopholes within the policy.
ANON-QNH5-RD7H-H	Charlote Cook	On behalf of an Organisation	SEGRO			
ANON-QNH5-RD1W-T	Zhanine Smith	On behalf of an Organisation	Essex County Council	Inconsistent terminology uses for Carbon and Energy Offset Schemes (Essex County Council)	Essex County Council states that the Council should ensure that there is consistent terminology referencing throughout the Local Plan in the use of carbon offset (par 9.8) or energy offset (para 9.15), where reference is made to Essex energy offset scheme.	The Council thanks Essex County council for their comments and proposed amendments. The Council will consider the proposed modifications further during examination following further discussion with a shared view to ensuring the policy requirements remain strong.

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RD6V-X	David Barnes	On behalf of an Organisation	Agent on behalf of Welbeck Strategic Land IV LLP	National Standards and Viability	Landsec supports the aspiration of the requirement in relation to requiring all new buildings to be designed and built to be Net Zero Carbon in operation. However, Core Policy 22 should be amended to state that this will be subject to wider viability and other considerations at planning application stage. This is important given that the requirement goes beyond Building regulations and national policy. It also has the potential to make developments unviable. Weston Homes consider that the Local Plan need not include policies that cover technical standards dealt with through Future Homes Standard and building regulations given the Government's intention is to use the technical standards delivered through Building Regulations (paragraph 159b NPPF). Weston Homes, Durkan Estates Ltd and Gladman Developments Ltd, Higgins Group, Salacia Ltd, Ropemaker Properties Ltd, and Bloor Homes (Eastern) consider that the most effective way of reducing carbon emissions and to ensure a consistent approach to net zero development is through Building Regulations and that significant improvements in energy efficiency will be brought through the Future Homes Standard. Most, including the Home Builders Federation (HBF), agree that there is a need to act but not necessarily through the local plan since delivering through building regulations allows supply chains, skills and building standards to be improved prior to implementation. Audley End Estate state that the Council's policy base should be robust and written to conform to what is occurring at the national level including response to the Written Ministerial Statement ('WMS') of 13th November 2023. The Home Builders Federation confirmed the WMS that any standard that goes beyond building regulations should be rejected at examination if the Local planning Authority does not have a well-reasoned and robustly costed rationale ensuring viability is not affected. The approach proposed by the Council based on energy use is inconsistent with the approach set out in the written ministerial statement. Therefore, if the Council are to require standards above those set out in building regulations they must be expressed as a percentage of the target emission rate and not as an energy use target. The Home Builders Federation recommend that a policy should require development to be net zero rather than individual homes. Further views were expressed that zero carbon energy sources and higher efficiency standards have significant resource implications and will not be viable or appropriate due to design in every case. Hence CP 22 should recognise the context for and the impact of prescriptive requirements on individual site delivery which they consider may make a site unviable. Bloor Homes (Eastern) recognise Local Planning Authorities' legal duty to deliver carbon reductions through the planning process but also feel that the policy requirements may impact on viability or the delivery of other infrastructure items such as affordable housing. Further doubt is cast on the local plan viability evidence regarding policy requirements, and it is considered that in the context of the tests of soundness (para.35 of NPPF 2023) further work is required	The Local Plan is ambitious in its policies to ensure that the Council addresses the climate and biodiversity emergency and addresses the Local Plan Strategic Objective SO1 which contributes also to the Government target of being net zero by 2050. The energy standards required by the current Building Regulations 2021 (Part L), and the indicative standards for the next update to Part L (Future Homes Standard, 2025) are neither strict enough to make new homes net zero nor energy efficient enough to help meet the UK's carbon budgets. The Council, alongside other ambitious authorities, using experts in the field, has sought to derive standards to help achieve this. They necessarily go beyond requirements in Building Regulations and the Future Homes Standards and are supported by a robust evidence base which also aligns with research and feasibility work undertaken by Essex County Council over the past couple of years. This evidence base considers the robustness of targets and the policy bases covering climate change in Core Policies 22, 23, 24 and 25. Furthermore, King's Counsel advice commissioned by the County on the soundness of the WMS is firmly of the view that local authorities are able to set standards beyond Building Regulations as long as they are well evidenced and justified. The Local Plan is also supported by viability assessment which considered the impact of tight energy and space heating standards in Core Policy 22 on new developments. The viability assessment found that the costs associated with achieving net zero were minimal and should not impact the viability of the development. It is for the developer to decide the best way of achieving net zero. In addition, the Essex technical research provides proportionate evidence to demonstrate that meeting the EUI target of 35 kWh/m2/year on individual dwellings is technically feasible at reasonable cost on all the residential typologies modelled. The issue of achieving this across the whole development is a point of further consideration because of the range of circumstances and house types plus phasing periods over which such an assessment would be made. It is not proposed to make any modification to the standards set in this policy.

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					to ensure that Core Policy 22 is ‘justified’ and to ensure that the policy is consistent with national policy. Salacia Ltd share these views and point out that the Viability Assessment includes a +5% over cost for energy/carbon efficiency, but that estimating costs is difficult with different builders having diverse baselines, price risk, learning and using different assumptions plus allowance for financial viability or technical feasibility to be taken into account on a site-by-site basis. They emphasise that from 2025, compliance with the Future Homes Standard (FHS) will become mandatory and set out a national approach. HBF suggest that the costs employed be those published by the Future Homes Hub. Welbeck Strategic Land IV LLP state that the cost of meeting the proposed CP22 standards is c £10,000 per dwelling compared to current Building Regulations and c £3,000 per dwelling when compared to the Future Homes Standards. Respondents add that whilst the Planning and Energy Act 2008 gives local authorities powers to include new build energy efficiency standards in policies in their Local Plan there is no government guidance on when this is appropriate, nor consideration of supply chains and skills required which could delay delivery. The requirement for an Energy Strategy is not considered to be practical or proportionate for outline applications and accurate methods to predict operational energy are not feasible and where such matters are determined as reserved matters application. Although Endurance Estates Ltd recognise the importance of reducing carbon emissions it considers the policy to be restrictive and greater flexibility should be incorporated in order to ensure that it does not compromise development, including enforcement of the renewable energy generation targets (Requirement 4) which could have an impact on the design. They request amendment to the wording of the policy to provide more flexibility for on-site generation and design of arrays that maximise panel utilisation and on-site consumption. One promoter questions CP22-5(ii) on monitoring as to the practicalities for the developer and house occupier of in-use energy monitoring for the first 5-years of operation for a minimum of 10% of dwellings for development proposals of 100 dwellings or more. The Home Builders Federation recommend that policy should require the development to be net zero rather than individual homes. They feel that most energy efficient design will lead to less variety in the built form which should be reflected in design policies and any design codes. The energy use requirements should be deleted from Core Policy 22.	
ANON-QNH5-RD39-X	Higgins Group	On behalf of an Organisation	Boyer on behalf of Higgins Group	National Standards and Viability	Landsec supports the aspiration of the requirement in relation to requiring all new buildings to be designed and built to be Net Zero Carbon in operation. However, Core Policy 22 should be amended to state that this will be subject to wider viability and other considerations at planning application stage. This is important given that the requirement goes beyond Building regulations and	The Local Plan is ambitious in its policies to ensure that the Council addresses the climate and biodiversity emergency and addresses the Local Plan Strategic Objective SO1 which contributes also to the Government target of being net zero by 2050. The energy standards required by the current Building Regulations 2021 (Part L), and the indicative standards for the next update to Part L (Future Homes Standard, 2025) are neither strict enough to make new homes net zero nor energy efficient enough to help meet the UK’s carbon budgets. The Council, alongside other ambitious authorities, using experts in the field, has sought to derive standards to
ANON-QNH5-RDWU-X	Tara Lewis	On behalf of an Organisation	DLP Planning Ltd on behalf of Salacia Ltd			

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ANON-QNH5-RD3H-D	Kim Rickards	On behalf of an Organisation	Durkan Estates Ltd		national policy. It also has the potential to make developments unviable. Weston Homes consider that the Local Plan need not include policies that cover technical standards dealt with through Future Homes Standard and building regulations given the Government's intention is to use the technical standards delivered through Building Regulations (paragraph 159b NPPF). Weston Homes, Durkan Estates Ltd and Gladman Developments Ltd, Higgins Group, Salacia Ltd, Ropemaker Properties Ltd, and Bloor Homes (Eastern) consider that the most effective way of reducing carbon emissions and to ensure a consistent approach to net zero development is through Building Regulations and that significant improvements in energy efficiency will be brought through the Future Homes Standard. Most, including the Home Builders Federation (HBF), agree that there is a need to act but not necessarily through the local plan since delivering through building regulations allows supply chains, skills and building standards to be improved prior to implementation. Audley End Estate state that the Council's policy base should be robust and written to conform to what is occurring at the national level including response to the Written Ministerial Statement ('WMS') of 13th November 2023. The Home Builders Federation confirmed the WMS that any standard that goes beyond building regulations should be rejected at examination if the Local planning Authority does not have a well-reasoned and robustly costed rationale ensuring viability is not affected. The approach proposed by the Council based on energy use is inconsistent with the approach set out in the written ministerial statement. Therefore, if the Council are to require standards above those set out in building regulations they must be expressed as a percentage of the target emission rate and not as an energy use target. The Home Builders Federation recommend that a policy should require development to be net zero rather than individual homes. Further views were expressed that zero carbon energy sources and higher efficiency standards have significant resource implications and will not be viable or appropriate due to design in every case. Hence CP 22 should recognise the context for and the impact of prescriptive requirements on individual site delivery which they consider may make a site unviable. Bloor Homes (Eastern) recognise Local Planning Authorities' legal duty to deliver carbon reductions through the planning process but also feel that the policy requirements may impact on viability or the delivery of other infrastructure items such as affordable housing. Further doubt is cast on the local plan viability evidence regarding policy requirements, and it is considered that in the context of the tests of soundness (para.35 of NPPF 2023) further work is required to ensure that Core Policy 22 is 'justified' and to ensure that the policy is consistent with national policy. Salacia Ltd share these views and point out that the Viability Assessment includes a +5% over cost for energy/carbon efficiency, but that estimating costs is difficult with different builders having diverse baselines, price risk, learning and using different assumptions plus allowance for	help achieve this. They necessarily go beyond requirements in Building Regulations and the Future Homes Standards and are supported by a robust evidence base which also aligns with research and feasibility work undertaken by Essex County Council over the past couple of years. This evidence base considers the robustness of targets and the policy bases covering climate change in Core Policies 22, 23, 24 and 25. Furthermore, King's Counsel advice commissioned by the County on the soundness of the WMS is firmly of the view that local authorities are able to set standards beyond Building Regulations as long as they are well evidenced and justified. The Local Plan is also supported by viability assessment which considered the impact of tight energy and space heating standards in Core Policy 22 on new developments. The viability assessment found that the costs associated with achieving net zero were minimal and should not impact the viability of the development. It is for the developer to decide the best way of achieving net zero. In addition, the Essex technical research provides proportionate evidence to demonstrate that meeting the EUI target of 35 kWh/m2/year on individual dwellings is technically feasible at reasonable cost on all the residential typologies modelled. The issue of achieving this across the whole development is a point of further consideration because of the range of circumstances and house types plus phasing periods over which such an assessment would be made. It is not proposed to make any modification to the standards set in this policy.
ANON-QNH5-RDRS-Q	Richard Agnew	On behalf of an Organisation	Gladman Developments Ltd			
ANON-QNH5-RD39-X	Mark Edgerley	On behalf of an Organisation	Boyer on behalf of Higgins Group			
ANON-QNH5-RDDJ-Z	Mark Behrendt	On behalf of an Organisation	Home Builders Federation			
ANON-QNH5-RDAD-Q	Marie Jasper	On behalf of an Organisation	Landsec			
ANON-QNH5-RDRA-5	Robert Barber	On behalf of an Organisation	Pegasus Group on behalf of Bloor Homes Eastern			
ANON-QNH5-RDZX-4	Johnathan Dixon	On behalf of an Organisation	Savills on behalf of Audley End Estate			
ANON-QNH5-RDA6-9	Jonathan Dixon	On behalf of an Organisation	Savills on behalf of Endurance Estates Limited			
ANON-QNH5-RDWE-E	Graeme Warrnier	On behalf of an Organisation	Stantec on behalf of Ropemaker Properties Ltd			
ANON-QNH5-RD7K-M	David Poole	On behalf of an Organisation	Weston Homes			

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					financial viability or technical feasibility to be taken into account on a site-by-site basis. They emphasise that from 2025, compliance with the Future Homes Standard (FHS) will become mandatory and set out a national approach. HBF suggest that the costs employed be those published by the Future Homes Hub. Welbeck Strategic Land IV LLP state that the cost of meeting the proposed CP22 standards is c £10,000 per dwelling compared to current Building Regulations and c £3,000 per dwelling when compared to the Future Homes Standards. Respondents add that whilst the Planning and Energy Act 2008 gives local authorities powers to include new build energy efficiency standards in policies in their Local Plan there is no government guidance on when this is appropriate, nor consideration of supply chains and skills required which could delay delivery. The requirement for an Energy Strategy is not considered to be practical or proportionate for outline applications and accurate methods to predict operational energy are not feasible and where such matters are determined as reserved matters application. Although Endurance Estates Ltd recognise the importance of reducing carbon emissions it considers the policy to be restrictive and greater flexibility should be incorporated in order to ensure that it does not compromise development, including enforcement of the renewable energy generation targets (Requirement 4) which could have an impact on the design. They request amendment to the wording of the policy to provide more flexibility for on-site generation and design of arrays that maximise panel utilisation and on-site consumption. One promoter questions CP22-5(ii) on monitoring as to the practicalities for the developer and house occupier of in-use energy monitoring for the first 5-years of operation for a minimum of 10% of dwellings for development proposals of 100 dwellings or more. The Home Builders Federation recommend that policy should require the development to be net zero rather than individual homes. They feel that most energy efficient design will lead to less variety in the built form which should be reflected in design policies and any design codes. The energy use requirements should be deleted from Core Policy 22.	
ANON-QNH5-RDHJ-4	Pascale Muir	Individual / member of the public		New Development and Carbon Emissions	The respondent states that building of new homes causes c4.5 times more carbon emissions than refurbishing existing homes as well as the wider environmental issues and that the plan has an economic focus as much as meeting housing need . Another respondent allege there is conflict in the Plan's aspirations for energy efficiency and addressing climate change and development within green belt and green spaces while the Council has a goal of achieving net zero.	The Council appreciates that there are concerns with meeting the development needs for Uttlesford District while working towards net zero. The purpose of Core Policy 22 is to address energy efficiency of new building to work towards developments that are net zero. Uttlesford Council is obliged to plan for the housing and employment needs of the District. The site selection /HELAA process identified the most sustainable sites which have been allocated in the Local Plan, taking into account environmental constraints. Moreover, several policies in the Local Plan aim to limit development within the green belt (CP59) and protect spaces for nature (CP38, CP39). The Local Plan does not propose any development within the Green Belt, but three small amendments have been made to the Green Belt to reflect development that has been built.
ANON-QNH5-RDXJ-M	Rodelle Beauchamp	Individual / member of the public				
ANON-QNH5-RD97-2	Lydia Sadler	On behalf of an Organisation	Stansted Airport Limited	On-site renewable energy generation on existing locations	Stansted Airport Limited supports the broad aspirations set out in Core Policy 22, which aligns with the MAG's target to be net zero carbon by 2038. Stansted Airport Limited suggests that Policy Requirement 2 should make provision for locations where renewable energy production is already on site, as in certain circumstances, it may not be possible for further provision to be made on-site.	The Council welcomes the support of Stansted Airport Limited and their comments are noted. The aim of Requirement 2 is to ensure fossil fuel free development and no use of fossil fuels on site and therefore, the existing provision of onsite renewable energy provision will be taken into consideration at planning application stage.

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				(Stansted Airport Limited)		
ANON-QNH5-RD9X-3	Lorraine Flawn	On behalf of an Organisation	Takeley Neighbourhood plan team	Renewable energy	The Takeley Neighbourhood Plan Team encourages the use of ground source heating which should be achievable and considered from the outset on the large scale development at Takeley. Solar generation should not use good agricultural land. Access to the grid should be considered from the outset.	The Council welcomes the Respondents support for renewable energy development. Core Policy 25 supports all proposals for renewable and low carbon energy generation and the creation and expansion of heat networks. Any planning application for renewable energy development including solar will be assessed against the policy requirements within Core Policy 25 which requires any adverse impacts on the environment and on the best and most fertile agricultural land to be considered.
ANON-QNH5-RDN3-K	Edward Gildea	On behalf of an Organisation	Uttlesford Green Party	Requirements for New Build Development	The respondents believe that new builds need to be net negative in their operation and that all new homes should be carbon negative in both their construction as well as their operation. The respondent believes that the most affordable way to build 'zero carbon in operation' new homes is by modular systems, built in factories to the highest standards. This building technology should be encouraged both in the Local Plan and the Design Code. The benefits of using hemp and CLT is also highlighted. Uttlesford Green Party also supports the ambition to rapidly upscale renewable energy generation, reducing greenhouse gas emissions and the aim to become energy neutral within sites. It would be useful to have assessment of the likelihood of reaching or exceeding that level within the Local Plan timescale and are disappointed that there is no ambition for sites to be net exporters of clean energy. They are wary of the 'get out clause' for developers to use a 'carbon offset' when they claim that self-sufficiency is impossible since this is not a likely situation.	The Council welcomes support from the respondents, including the Uttlesford Green Party. At the core of the Uttlesford Local Plan is the need to address the climate emergency and support the transition to net zero by 2030. Core Policy 22 requires all development proposals to demonstrate what measures have been taken to reduce embodied carbon content. This will ensure that new development including house building will be net zero. The Local Plan pushes developers to be ambitious and ensure they create developments that are net zero, however, the national policy is not currently at a place to support net negative development. It is understood that there are a variety of measures that can be used to make developments carbon negative and it is for the developer to choose the most suitable measures that will create a carbon negative development while ensuring the development is viable. The aim of the policy is to encourage low energy usage by building to strict air tightness and insulation standards, including to Passivhaus which reduces the need for internal heating. Energy for unregulated uses such as appliances should be generated from renewable sources. The reduction in operational energy needs to be balanced as the respondents indicate by reducing the energy used in production and transportation of materials. For the Council to allow developers to contribute to a 'carbon offset' scheme would be a last resort to ensure that the Council continues to work towards net zero while ensuring that sustainable development is delivered. The policies in Chapter 9 support the creation of net zero developments including reducing overheating and embodied carbon which will support the Council to being net zero by 2030. However, the Council recognise that this may not be possible in some developments, particularly smaller developments that may not become viable to incorporate new zero initiatives. The Local Plan pushes developers to be ambitious and ensure they create developments that are net zero, with a Monitoring Framework to encourage sustained compliance. The framework sets out how the Council will monitor the progress of achieving Strategic Objective 1 which covers the climate and ecological emergency. Given the variety of measures that can work towards carbon negative developments it is for the developer to choose the most suitable measures that will create a carbon negative development while ensuring the development is viable. Modular Construction using renewable materials helps to achieve this. CP22 on embodied carbon encourages this approach. It is for the developer to choose the most suitable measures that will create a carbon net zero or even negative development while ensuring that development is viable.
ANON-QNH5-RDC4-9	Margaret Shaw	Individual / member of the public				
ANON-QNH5-RDN8-R	Great Dunmow Town Council	On behalf of an Organisation	Great Dunmow Town Council	Support	Great Dunmow Town Council, Stebbing Parish Council, Little Easton Parish Council, Littlebury Parish Council and Littlebury Residents Group supports Core Policy 22 which is in line with Chapter 14 of the NPPF. Respondents also support the Passivhaus standards and would support further development in Wimbish if this were affordable housing built to Passivhaus standard. Another respondent believes that additional costs should not deter this objective and will be offset through ongoing future environmental and financial savings. In line with respondents' and parish council support for the Local Plan's approach to addressing climate change in general and the clarity with which this is expressed as	The Council strongly welcomes the overall support for this policy and related climate change policies. The comments are noted.
ANON-QNH5-RDRD-8	n/a	On behalf of an Organisation	Little Easton Parish Council			
ANON-QNH5-RDRT-R	Tracy Coston	On behalf of an Organisation	Littlebury Parish Council			

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ANON-QNH5-RD9A-C	Nick Dukes	On behalf of an Organisation	Littlebury Residents Group		at the heart of this Local Plan, they felt it important that where development does take place, it is delivered to the highest possible standards, and hence support is also expressed for the related design standards and guidance (Core Policy 52) to work alongside the Uttlesford Design Code and Essex Design Guide, more restrictive standards on water use (Core Policy 34) and the target to achieve 20% biodiversity net gain (Core Policy 40).	
ANON-QNH5-RD1Q-M	clerk to Stebbing Parish Council	On behalf of an Organisation	Stebbing Parish Council			
ANON-QNH5-RDC1-6	Paul Anderson	Individual / member of the public				
ANON-QNH5-RDMU-M	Michael Young	Individual / member of the public				
ANON-QNH5-RDA3-6	Hyacinth Cabiles	On behalf of an Organisation	NHS Property Services (NHSPS)	Support (NHS Property Services)	NHS Property Services supports Core Policy 22, highlighting its function in promoting carbon neutral development in line with the NHS's objectives. NHS Property Services highlights that it could benefit from carbon offset funds collected where on-site carbon mitigation requirements cannot be met, which would support its goal in becoming the world's first net zero healthcare provider.	The Council welcomes NHS Property Services support for Core Policy 22.
ANON-QNH5-RD1W-T	Zhanine Smith	On behalf of an Organisation	Essex County Council	Typographical Errors (Essex County Council)	Essex County Council highlights a number of minor typographical errors in the supporting text and number of Appendices, including: <ul style="list-style-type: none"> Paragraph 9.12 onsite to be replaced by onsite Reference to Appendix 8 should be amended to Appendix 10 Delete 'less than' in Part A Requirement 1 of Core Policy 2 Update reference to Table 2 in Appendix 10 	Noted. The Council has considered all typographical errors identified and will propose modifications to the Plan to correct them.

Core Policy 23: Overheating

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RD3H-D	Kim Rickards	On behalf of an Organisation	Durkan Estates Ltd	Building Regulations - Overheating	The respondent argues that this policy is unnecessary because Building Regulations already require residential developments to avoid overheating.	The Council aims to encourage best practices in the industry and local authorities have a duty to mitigate climate change through planning policy. The energy standards required by the current Building Regulations 2021 (Part L), and the indicative standards for the next update to Part L (Future Homes Standard, 2025) are neither strict enough to make new homes net zero nor energy efficient enough to help meet the UK's carbon budgets. Therefore, the Council have built on the requirements set out within Building Regulations and the Future Homes Standards to ensure Uttlesford Council meets its net zero targets. While Building Regulations address overheating in residential developments, the compliance tools for Building Regulations are not intended to evaluate accurately overheating in every case. Major development proposals are therefore encouraged to use the CIBSE standards TM5294 for non-residential development and TM5995 for residential development. The policy thus provides additional clarity and guidance, including demonstrating the integration of the cooling hierarchy.
ANON-QNH5-RD7K-M	David Poole	On behalf of an Organisation	Weston Homes	Core Policy 23 - National Standards	Weston Homes request the removal of Core Policy 23. Additional Local Plan policies are not required where national standards are available, particularly through the Future Homes Standard and Building Regulations. The Government's intention is to use building regulations as the focus for the national standard on this matter, as stated within paragraph 159b of the NPPF. Weston Homes recognise and support the need for development to reduce	The Council aims to encourage best practices in the industry and local authorities have a duty to mitigate climate change through planning policy. The energy standards required by the current Building Regulations 2021 (Part L), and the indicative standards for the next update to Part L (Future Homes Standard, 2025) are neither strict enough to make new homes net zero nor energy efficient enough to help meet the UK's carbon budgets. Therefore, the Council have built on the requirements set out within Building Regulations and the Future Homes Standards to ensure Uttlesford Council meets its net zero targets. While Building Regulations address overheating in residential
ANON-QNH5-RD3H-D	Kim Rickards	On behalf of an Organisation	Durkan Estates Ltd			

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
					its carbon emissions, however, this should be down through Building Regulations. Durkan Homes states that Core Policy 23 is unnecessary as the requirement to reduce overheating for residential properties is set out in Building Regulations.	developments, the compliance tools for Building Regulations are not intended to evaluate accurately overheating in every case. Major development proposals are therefore encouraged to use the CIBSE standards TM5294 for non-residential development and TM5995 for residential development. The policy thus provides additional clarity and guidance, including demonstrating the integration of the cooling hierarchy.
ANON-QNH5-RDCT-9	Sophie Pain	On behalf of an Organisation	Pigeon	Core Policy 23 - Restrictive	Pigeon acknowledges the importance of addressing overheating but finds the policy too restrictive. Pigeon highlights an inconsistency within the policy covering when a Climate Change & Sustainability Statement is required. Pigeon argues it is unreasonable to require compliance at the outline stage, though developers should commit to the policy's objectives, with details to be provided during the Reserved Matters stage. The respondent suggests some wording changes to the policy, including omitting "including outline applications", as well as that development proposals "should" (instead of "must") demonstrate "that" (instead of "how") the cooling hierarchy has been integrated into design decisions. They also suggest that the wording of the policy should rectify that outline applications should provide as much detail as possible, "reasonable, and appropriate" on early choices towards overheating mitigation. They also suggest the omission of "for example, layout and landform" and suggest that a subsequent reserved matters application "should" demonstrate compliance with the policy, omitting "will be required to provide detail".	The restrictiveness of the policy is important in ensuring that Uttlesford mitigates and adapts to climate change, including our goal to achieve net-zero carbon status by 2030. Removing reference to "must" and replacing with "should" could leave the policy open to interpretation and make it challenging to ensure compliance with the policy requirements particularly the colling hierarchy. On this basis, the Council are satisfied with the wording and approach.
ANON-QNH5-RDAU-8	Alex Cole	On behalf of an Organisation	Pigeon (Takeley) Ltd			
ANON-QNH5-RDN8-R	Great Dunmow Town Council	On behalf of an Organisation	Great Dunmow Town Council	Core Policy 23 - Support	Great Dunmow Town Council welcomes Core Policy 23 and consider it sound. They find the policy to be in line with Chapter 14 of NPPF. Another respondent supports Core Policy 23, noting that the current housing supply has a significant carbon footprint	Support noted and welcome.
ANON-QNH5-RDC1-6	Paul Anderson	Individual / member of the public				
ANON-QNH5-RDZN-T	Fiona Martin	On behalf of an Organisation	Natural England	Cross reference to Core Policy 39	Natural England states that Core Policy 23 should cross-link to the requirements of Core Policy 39, referencing the role of Green Infrastructure in contributing to urban cooling.	The positive benefits of green infrastructure, particularly tree canopy cover, in relation to contributing to urban cooling are agreed. This is acknowledged within Core Policy 39 which recognises the role of Green and Blue Infrastructure in responding to climate change. Any proposals for major developments are required to consider the Local Plan as a whole which includes meeting the policy requirements of Core Policy 39. The Council will include a cross-reference to Core Policy 39 as part of the proposed modifications to the Plan.

Core Policy 24: Embodied Carbon

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RDN3-K	Edward Gildea	On behalf of an Organisation	Uttlesford Green Party	Construction materials	Uttlesford Green Party emphasises the potential of buildings to capture and store carbon for long periods, advocating for all new homes to be carbon negative. They suggest using materials like cross-laminated timber and hemp, which sequester carbon and align with local heritage. The respondent highlights the versatility of hemp in construction. The respondent calls for Uttlesford to pioneer sustainable building practices, including modular construction systems, which they believe will reduce	The Council welcomes comments from Uttlesford Green Party on measures to ensure homes are carbon negative. Core Policy 24 requires development proposals to demonstrate what measures have been taken to reduce embodied carbon. There is a variety of measures that can be used to help make developments carbon negative and developers will be expected to use the materials and sustainable construction methods that are most appropriate for that development to meet the policy requirements set out in Core Policy 24.

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
					carbon emissions and improve efficiency during construction, ultimately creating jobs in a post-fossil fuel economy.	
ANON-QNH5-RD1W-T	Zhanine Smith	On behalf of an Organisation	Essex County Council	Core Policy 24 - Support	Great Dunmow Town Council welcomes Core Policy 24 and considers it to be in line with Chapter 14 of NPPF, and therefore sound. Essex County Council supports Core Policy 24 but considers that the policy can be strengthened with evidence from the Essex Embodied Carbon Policy Study (June 2024). In addition to a couple of typo errors which will be picked up as additional modifications. They consider that all applications should demonstrate steps taken to reduce impact on embedded carbon and not just ‘major’ (para. 3) applications. To enhance clarity regarding the target “or less” should be added after clause A and B. Part Ai). Whereas the policy applies to large scale residential schemes of 100+ dwellings (para. 4) the Essex Study recommends this should apply to major residential development of 10+ dwellings, and the County recommend that these threshold levels should be consistent with the published Essex Embodied Carbon Policy Study.	The Council welcomes Essex County Council's support for the inclusion of Core Policy 24 and their comments are noted. The Council welcomes the support of Great Dunmow Town Council and other respondents. The Council does not object to considering the potential for relatively minor modifications to Core Policy 24, it is considered these will be considered in the round through the Examination process. The Council is satisfied with the policy in its current form.
ANON-QNH5-RDN8-R	Great Dunmow Town Council	On behalf of an Organisation	Great Dunmow Town Council			
ANON-QNH5-RDC1-6	Paul Anderson	Individual / member of the public				
ANON-QNH5-RDAU-8	Alex Cole	On behalf of an Organisation	Pigeon (Takeley) Ltd	Flexibility	Pigeon Investments support the need to reduce embodied carbon but requests more flexibility to clarify distinctions between domestic and non-domestic uses, and for outline applications where details such as materials and construction methods have yet to be determined and should be agreed in Reserved Matters. There is concern that low-carbon materials may be more expensive or difficult to obtain. The promoters suggest modification to CP24 to include this and that ‘All development proposals must should demonstrate, through the Climate Change & Sustainability Statement, what any measures (that) have been taken to reduce embodied carbon content as far as possible is reasonable practicable.....Major new-build proposals should identify the steps taken to reduce where reasonable practicable the building or overall development’s impact on embodied carbon e.g. regarding its design and building materials to minimise embodied carbon. Proposals for large scale new-build developments (a minimum of 100 dwellings or a minimum of 5000m2 of non-residential floor space) must submit a Whole Life Carbon Assessment. This should must demonstrates the following targets have been met, subject to relevant planning and development considerations, including project viability and availability of low carbon materials/methods.....”	The Council welcomes the support from Pigeon in relation to reducing embodied carbon. It is understood that detailed design may not be confirmed until Reserved Matters stage, but the principles can be covered in the required Climate Change & Sustainability Statement. If the developer feels there are issues affecting the achievement of the targets this can be explored as part of the planning application process, but it is unlikely that the required target standards will be reduced because of the overriding importance of climate change targets and as a key objective of the Local Plan. Furthermore, the increasing availability of green skills in design and construction and of the materials supply chain mean these are not anticipated to be obstacles, especially over the lifetime of the Local Plan. No modification to the policy is proposed.
ANON-QNH5-RDCT-9	Sophie Pain	On behalf of an Organisation	Pigeon			
ANON-QNH5-RDWV-Y	Gary Spilman	Individual / member of the public		Policy Wording	The Gladman Developments Ltd feel there is a lack of sufficient information to support consistent and effective assessment of embodied carbon- for Core Policy 24 to be effectively implemented. The policy should instead encourage development to reduce the level of embodied carbon but not require it to achieve a specific standard. One Respondent feels that the policy is difficult to interpret because it is very technical making it difficult to interpret. The policy does not seem to allow for timber houses.	The aim of the policy is to work towards lowering embodied carbon as a component of local authorities’ duty to mitigate climate change through planning policy. There are several recognised methodologies as referenced in paragraph 9.43 of the Local Plan. The Local Plan is supported by evidence base including the ECC Embodied Carbon report of June 2024. The Council have aimed to make the wording of Core Policy 24 accessible and widely applicable. However, to ensure that the requirements in relation to embodied carbon are met some level of technical detail is required though it is not appropriate to require the use of specific materials. Developers will be expected to use the materials and sustainable construction methods that are most appropriate for that development to meet the policy requirements set out in Core Policy 24.
ANON-QNH5-RDRS-Q	Richard Agnew	On behalf of an Organisation	Gladman Developments Ltd			
ANON-QNH5-RD3H-D	Kim Rickards	On behalf of an Organisation	Durkan Estates Ltd	Recognised Standards	Durkan supports the need to reduce embodied carbon but notes that since there is no national standard reducing embodied carbon should be encouraged as good practice rather than as a policy	The Council welcomes the general support for the ambitions of this policy from respondents. The energy standards required by the current Building Regulations 2021 (Part L), and the indicative standards for the next update to Part L (Future Homes Standard, 2025) are neither strict enough to

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RDZX-4	Johnathan Dixon	On behalf of an Organisation	Savills on behalf of Audley End Estate		requirement. Audley End Estate is concerned about setting a new specific technical standard for embodied carbon in new with a requirement to undertake accurate whole life carbon assessment. They feel that this is compromised by the lack of data about embodied carbon in a whole range of building materials and that the policy should not be included in the Plan. Welbeck Strategic Land object to the proposed standards for embodied carbon and the need for Whole Life Assessments believing that both should be established at the national level. The Home Builders Federation consider that the requirement in relation to embodied carbon is not consistent with national policy. They state that the Planning and Energy Act 2008 permits councils to set energy efficiency standards to exceed building regulations, but not specifically standards with regard to the embodied carbon in new buildings, nor as an optional technical standard in PPG. They feel that lack of data compromises accuracy of whole life carbon assessment and whether it can be sufficiently robust to be in policy. It should be dealt with at a national level to ensure consistency as demonstrated by the housebuilding industry working with the Future Homes Hub to develop a roadmap to reducing embodied carbon. Salacia Ltd also consider that embodied carbon is addressed at a national level to avoid different approaches and standards being set in different areas given the lack of an agreed national methodology for calculating embodied carbon. Bloor Homes (Eastern) state there is no nationally set standard in relation to embodied carbon and suggest that the policy be used to encourage developments to reduce levels of embodied carbon since a target based approach is unjustified. They point out various Typo errors which the Council has noted and will be corrected. Weston Homes recognise and support the need for development to reduce its carbon emissions but consider that the most effective way of achieving a reduction in carbon emissions across new developments is through Building Regulations. Additional local policies are not required for where details are set out in technical standards such as Building Regulations and the Future Homes Standard as is the Government’s intention as stated in paragraph 159b of the NPPF.	make new homes net zero nor energy efficient enough to help meet the UK’s carbon budgets. Therefore, the Council along with a growing number of like-minded authorities, has worked with expert consultancies and research undertaken by the County Council to extend the target in order to reach net zero in operation standards through CP22 and to work towards the embodied carbon targets in CP24. ECC’s initial Embodied Carbon report of June 2024 identified a minimal additional cost uplift of 2-3% with some construction types and/or materials considered cost neutral. While there is no national standard as yet for embodied carbon it is appropriate that the Council adopts industry-recognised methodology to derive standards using LETI and RIBA targets which will reduce the embodied carbon component of new development and as set out in Appendix 10.
ANON-QNH5-RD6V-X	David Barnes	On behalf of an Organisation	Agent on behalf of Welbeck Strategic Land IV LLP			
ANON-QNH5-RDDJ-Z	Mark Behrendt	On behalf of an Organisation	Home Builders Federation			
ANON-QNH5-RDWU-X	Tara Lewis	On behalf of an Organisation	DLP Planning Ltd on behalf of Salacia Ltd			
ANON-QNH5-RDRA-5	Robert Barber	On behalf of an Organisation	Pegasus Group on behalf of Bloor Homes Eastern			
ANON-QNH5-RD7K-M	David Poole	On behalf of an Organisation	Weston Homes			

Core Policy 25: Renewable Energy Infrastructure

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RD25-S	Matthew Bailey	Individual / member of the public		Carbon offset scheme	The respondent is generally supportive of Core Policy 25 and the supporting text and considers the plan to be deliverable and realistic. Details of carbon offset schemes could be provided where developers	The Council welcomes support for Core Policy 25 and the supporting text. The Council also welcomes the comment in relation to the Local Plan being realistic and deliverable. Paragraph 9.8 states that developers will need to contribute to a carbon offset scheme if it is not possible for the development to be energy neutral or individual buildings to be energy self-sufficient.

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
					cannot reasonably provide a zero carbon development, including monitoring and the accreditations a scheme will need to have.	
ANON-QNH5-RD1W-T	Zhanine Smith	On behalf of an Organisation	Essex County Council	Core Policy 25 - amendments	Essex County Council object to Core Policy 25 and the supporting text. They recommend that Core Policy 25 and the supporting text reflects policy guidance set out in the Policy Statement on Onshore Wind (dated 8th July 2024).	The Council are satisfied the policy is consistent with national guidance, but does not object to reviewing this again should that be considered necessary.
ANON-QNH5-RD9H-K	Berden Parish Council	On behalf of an Organisation	Berden Parish Council	Core Policy 25 - Strengthening	The strategy for new development to integrate renewable energy technologies is supported by Berden Parish Council. Upgraded wording around ground mounted installations is welcomed. Core Policy 25 needs to be strengthened by revising the following: Planning applications involving renewable energy development will only be permitted where any adverse impacts can be addressed satisfactorily, (including cumulative impact), are avoided on each and any of the following: Saffron Walden Town Council request the following modification to the last paragraph of Core Policy 25: "Proposals should must be accompanied by an energy statement".	The Council are satisfied the policy strikes an appropriate balance between promoting renewable energy development in support of the climate change emergency, whilst also ensuring there are appropriate safeguards against inappropriate development.
ANON-QNH5-RD7U-X	Saffron Walden Town Council	On behalf of an Organisation	Saffron Walden Town Council			
ANON-QNH5-RDN8-R	Great Dunmow Town Council	On behalf of an Organisation	Great Dunmow Town Council	Core Policy 25 - Support	Great Dunmow Town Council welcomes Core Policy 25 and consider it sound. They find the policy to be in line with Chapter 14 of NPPF.	The Council welcomes the support of Great Dunmow Town Council and the comments are noted.
ANON-QNH5-RD4F-C	Christopher Waldron	On behalf of an Organisation	Ministry of Defence	Core Policy 25 - Support - MOD	The Ministry of Defence welcomes paragraph 9.50. The Ministry of Defence may have an interest where development is of a type likely to have any impact on operational capability. This could include Solar PV, wind turbines, development that exceeds the height of 50m above ground level and development outside Ministry of Defence safeguarding zones but in the vicinity of military training estate or property. Solar panels may also produce glint and glare. Tall structures and wind turbine development can introduce physical obstacles to low flying aircraft. Wind turbines may impact on the operation of surveillance systems. Local Planning Authorities should consult the Ministry of Defence where a proposed turbine has a tip height of, or exceeding 11m, and/or has a rotor diameter of 2m or more.	The Council welcomes the support of paragraph 9.50 and the comments are noted. The Council welcomes continued engagement with the Ministry of Defence. The Council will also continue to engage with the Ministry of Defence where a planning application for renewable energy generation may impact on one of their assets.
ANON-QNH5-RD97-2	Lydia Sadler	On behalf of an Organisation	Stansted Airport Limited	Core Policy 25 - Support - Stansted Airport Limited	Stansted Airport Limited support Core Policy 25 subject to there being no detrimental impact on aviation safety. Stansted Airport Limited suggest that Core Policy 25 cross refers to the new aerodrome safeguarding policy recommend.	The Council welcomes the support of Stansted Airport Limited and the comments are noted.

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RDC4-9	Margaret Shaw	Individual / member of the public		Renewable energy - Bio-gas	Reference to community-led schemes and local energy sharing is encouraging. UDC should support local energy generation projects to flourish. The Respondent supports on-shore wind generation; PV development in car parks; and heat networks from zero carbon energy sources. Bio-gas generated from waste organic matter should be referenced.	The Council welcomes the Respondents support for renewable energy development. Matters in relation to waste fall with Essex County Council. However, Core Policy 25 supports all proposals for renewable and low carbon energy generation and therefore there is no need to specifically mention the different types of renewable energy generation available.
ANON-QNH5-RD25-S	Matthew Bailey	Individual / member of the public		Renewable energy - Electricity grid	The respondent is relatively supportive of Core policy 25 and the supporting text. The respondent states that the plan is deliverable and realistic. The limitations of the local grid connectivity, especially in rural areas could be considered.	The Council welcomes support for Core Policy 25 and the supporting text. The Council also welcomes the comment in relation to the Local Plan being realistic and deliverable. Any planning applications for renewable energy generation will undergo their own individual assessment taking into consideration any constraints within the surrounding area, including grid connectivity.
ANON-QNH5-RDN3-K	Edward Gildea	On behalf of an Organisation	Uttlesford Green Party	Renewable energy - Ground source heating	The Respondent supports reference to community-led schemes and local energy sharing. UDC should support local energy generation projects to flourish. The Respondent also supports on-shore wind generation; PV development on car parks; and, heat networks from zero carbon energy sources. There is no reference to local, community owned ground source or geo-thermal energy. There must be opportunities to install ground source heating systems under all recreational green spaces, football and cricket pitches, that could supply heating for adjacent homes.	The Council welcomes the Respondents support for renewable energy development and community-led schemes. Core Policy 25 supports all proposals for renewable and low carbon energy generation and therefore there is no need to specifically mention the different types of renewable energy generation available. Core Policy 25 also supports the creation and expansion of heat networks.
ANON-QNH5-RD4S-S	Bill Critchley	Individual / member of the public		Renewable energy - Solar	The Respondent feels they are not qualified to establish the legality of the plan. The Plan is flawed with highlighting and punctuation disappearing when reading on my iPad. The council must not promote solar generation on good quality agricultural land and should be instead included as part of car parking and industrial buildings. Stansted Airport have many hectares of car parks that could be suitable for solar generation. Once land is taken out of agricultural production it is removed for considerable time. When assessing such proposals the Council must consider the financial impact on remaining land. The Respondent notes that they are not qualified to comment on the legality of the Plan. Solar farms must be established on car parks. Any proposals for solar farms on agricultural land must be supported by a viability assessment to ensure that the critical mass of the remaining farm is maintained.	The Council thanks the Respondent for taking the time to respond to this consultation. Any application for a solar farm will be considered on a case by case basis including the consideration of any environmental designations and existing land use. Any planning application for renewable energy development will be assessed against the policy requirements within Core Policy 25 which requires any adverse impacts on best and most fertile agricultural land to be adequately addressed.
ANON-QNH5-RDT1-Q	Sharon Critchley	Individual / member of the public				
ANON-QNH5-RDU9-Z	John Burnham	Individual / member of the public		Renewable energy - Wind energy	The respondent suggests that Uttlesford's Local Plan should be updated to reflect the UK Government's new policy favouring onshore wind farms in suitable locations. They recommend including a detailed "Spatial Vision" to guide where wind and solar projects would be appropriate, ensuring visual and environmental considerations are respected. Uttlesford's low wind speeds make solar farms potentially more suitable, suggesting they be placed on flat land with hedging to reduce visual impact. The respondent stresses the importance of clear guidance for land use in renewable development.	It is understood that the new UK Government has committed to double onshore wind by 2030. The UK Government is currently revising planning policy to place onshore wind on the same footing as other energy development in the National Planning Policy Framework (NPPF). Core Policy 25 supports all forms of renewable energy generation which includes wind farms. Therefore, there is no need to revise the policy to refer to onshore wind energy generation specifically. Any application for a renewable energy development will be considered on a case by case basis including the consideration of any environmental designations and land use. Any planning application for renewable energy development will be assessed against Core Policy 25 which requires any adverse impacts on best and most versatile agricultural land to be adequately addressed.

Core Policy 26: Providing for Sustainable Transport and Connectivity

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RD1W-T	Zhanine Smith	On behalf of an Organisation	Essex County Council	Car Sharing	The NPPF glossary definition for ‘sustainable transport modes’ includes reference to car sharing. Essex County Council recommended that the Local Plan is amended to promote and facilitate car sharing. Paragraph 9.54 2nd sentence should be amended as below: “...including public transport and car sharing.” Paragraph 9.66 should be amended as below: “....and car sharing between drivers”."	The Council aims to address any transport infrastructure pressures within Uttlesford, that result from the Local Plan growth, through its Local Plan, specifically Core Policies 26, 27 & 28. The Council is content that the policy approach outlined in Core Policy 26 does support the delivery of a range of sustainable transport measures, including car clubs, which provide the opportunity and wider transport choice for those in new communities and existing residents, and that no modification is required to the supporting text. CoMoUK and transport consultants have considered that the delivery of the shared mobility schemes (which include new and improved bus services, car clubs and a bike hire scheme) contained as policy requirements on the strategic allocations will provide a realistic alternative to car travel for those who choose to take the opportunity to do so. The Council is satisfied that a modification is not required.
ANON-QNH5-RD97-2	Lydia Sadler	On behalf of an Organisation	Stansted Airport Limited	Continued engagement	Stansted Airport Limited state that a mechanism is currently in place to ensure that the use and development of the bus and rail interchange facilities at Stansted Airport continue to provide sustainable travel options for the Airports current and proposed levels of operation. STAL will work alongside key stakeholders to help facilitate new or modified bus services that make use of the bus and coach facilities at the airport’s transport hub. The aspiration to strengthen the role of Stansted as a public transport hub to facilitate sustainable travel across the wider area is acknowledged, but any such requirements should not be the sole responsibility of the airport. Stansted Airport Limited can work alongside key stakeholders to help facilitate new or modified bus services.	Stansted Airport Limited's comments are noted and welcomed. Uttlesford District Council will continue to work with Stansted Airport Limited and other key stakeholders to deliver public transport enhancements to and from the airport.
ANON-QNH5-RDN3-K	Edward Gildea	On behalf of an Organisation	Uttlesford Green Party	Delivery of Sustainable Transport	Comments were received questioning the effectiveness of the plan's sustainable travel policies. One respondent suggested the proposed schemes will have minimal impact, particularly in connecting towns and villages. There is a need for an East-West railway line to improve connectivity. There is a lack of a coherent cycling infrastructure, citing the Flitch Way's abrupt ending near Start Hill Farm without a connection to Bishops Stortford. The respondent emphasises that active travel from Bishops Stortford to Hatfield Forest and from Dunmow to Bishops Stortford is hindered by barriers like the M11/A120 interchange. They urge collaboration between UDC and ECC to address these longstanding issues. A second respondent raises concerns about the safety of transport along the B1256 near Takeley and highlights the government's active travel policy principles, emphasising the need for safe, accessible, and well-designed cycling infrastructure that is physically separated from motor vehicles. They conclude that development along the B1256 conflicts with Core Policy 26. One respondent notes the impact of transport on emissions and climate change and that the public transport system needs to meet the needs of residents and working population. One respondent	The Council aims to address any transport infrastructure pressures within Uttlesford, that result from the Local Plan growth, through its Local Plan, specifically Core Policies 26, 27 & 28. The Council is content that the policy approach outlined in Core Policy 26 does support the delivery of a range of sustainable transport measure that provide the opportunity and wider transport choice for those in new communities and existing residents. The Policy does require that development proposals should prioritise sustainable transport interventions and details a range of measures that should be provided. In addition, the transport evidence and Infrastructure Delivery Plan has identified specific schemes addressing sustainable transport and connectivity and particularly to increase the frequency of bus services to provide enhanced connections to a range of services. Providing enhancements to existing services and routes is considered to be more effective than diverting services into development sites. There are regular bus services that run from Gt. Dunmow and Takeley that offer a sustainable transport option to local services. The rail stations in the District offer regular services to London and Cambridge and for most settlements in the district the airport is accessible by rail services in less than 30mins with a change at Audley End. The Council will continue to have discussions with ECC, Stansted Airport, train operators and all transport providers, on improving and enhancing services on both bus and rail. The suggested new east-west rail scheme would be significant national infrastructure scheme that would require significant funding from national government. There is no evidence to suggest that this major intervention is required. It would not be possible for the modest growth in Uttlesford to fund the intervention or even justify a contribution. Core Policy 28: Active Travel – Walking and Cycling requires development proposals to deliver a network of safe and accessible walking and cycling routes including along the B1256 and this requirement is reinforced in the Area strategies. Core Policy 13 requires upgrades to the Flitch Way to be delivered including the improvement of access to the route. Furthermore, the policy makes direct reference to the need to contribute towards the delivery of schemes in the Uttlesford and Essex LCWIP. The LCWIP seeks to deliver strategic connections between Bishops Stortford and Gt. Dunmow. It is acknowledged that there are constraints on the highway and not all off site cycle routes will be off the highway, however, all new and enhanced routes should meet the appropriate design standards. The Council will work
ANON-QNH5-RD4S-S	Bill Critchley	Individual / member of the public				
ANON-QNH5-RDYU-Z	Louise Pepper	Individual / member of the public				
ANON-QNH5-RDUP-Q	Loftus Buhagiar	Individual / member of the public				

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
					highlights opposing comments made by the inspectors on rapid public transport to the airport from Dunmow town, which argues that bus services running on unsegregated carriageways, are unlikely to reduce car usage for local journeys and this approach contradicts Garden Community Principle 7. The respondent also notes that Reg 19 does not account for east of highway quarry (up to 1,200 homes west of Great Dunmow utt/21/1708/op) and state that this would be regarded as a serious planning omission as this development (combined with reg 19 allocated sites), and will greatly impact Dunmow's CO2 levels, which is incompatible with the NPPF. The respondent makes reference to the Inspector's comments which state that that the planning system should manage growth to support sustainability objectives. The respondent proposes that to address congestion and sustainability issues, the 715-home development on land either side of The Broadway should be removed.	with partner agencies and neighbouring authorities on improving cross-border sustainable transport connections including those over the M11. The local plan evidence has undertaken an appropriate and proportion appraisal of impacts on the local and strategic road network including the B1256 and has suggested localised interventions where mitigation may be required. The Local proposes the delivery of shared mobility schemes which include new and improved bus services, car clubs and a bike hire scheme which will be centrally located in transport/mobility hubs and aim to provide a realistic alternative to car travel for those who choose to take the opportunity to do so. The Council acknowledges the impact that transport has on CO2 levels in the Local Plan at section 9.52. The Transport Evidence has taken into account all known committed development including that at Highview Quarry. This has also been factored into the Plan's spatial strategy, as demonstrated by the table of housing supply in Core Policy 2 which includes all commitments up to March 2024
ANON-QNH5-RDEP-7	Martin Crisp	On behalf of an Organisation	Essex Bridleways Association	Developers obligations	The respondent notes that developers' obligations to provide sustainable travel opportunities are unsound unless they cater for wheelchair users and apart from in exceptional cases for equestrians.	The Council is satisfied that the policy approach in the Local Plan is appropriate and considers the needs of equestrians and disabled users. Core Policy 26 specifically states that "Provision should be inclusive and address disabled users and those with mobility needs". The policy goes on to require: "ensure that existing pedestrian and cycling routes and Public Rights of Way are retained as continuous linear features and improved where appropriate." Core Policy 28 re-iterates these requirements.
ANON-QNH5-RDAD-Q	Marie Jasper	On behalf of an Organisation	Landsec	Employment Sites - Takeley	The Policies Map identifies safeguarded land for strategic transport infrastructure along the B1256 adjacent to Land South of A120 North of Stortford Road site, intended for the provision of bus services. Landsec requests that Core Policy 26 should be amended to confirm that the bus services associated with this site are to be provided on the public highway adjacent to the site, rather than within the site.	The Council is content that the policy approach outlined in Core Policy 26 is satisfied that the approach is appropriate and proportionate in relation to the delivery of a range of sustainable transport measures that provide the opportunity and choice for those who work and have to access employment sites. The Policy does require that development proposals should prioritise sustainable transport interventions and details a range of measures that should be provided. The safeguarding of land should facilitate the delivery of a mobility hub on the strategic employment allocation. This mobility hub could facilitate access to bus services which operate on the public highway and/or facilitate the delivery of other services which may terminate or turn around on the site. The latter type of bus service would require access to the land as part of the strategic allocation. The exact nature and details of the service provision will be agreed with Essex County Council as part of the development management process and therefore it is prudent to retain flexibility on how buses may access and interact with the site. All strategic employment allocations and development proposals are expected to contribute towards transport infrastructure proposals including active travel and sustainable transport connections. The local plan evidence has undertaken an appropriate and proportion appraisal regarding the feasibility and delivery of the infrastructure required to deliver the strategic allocations. CoMoUK and transport consultants have considered that the delivery of the shared mobility schemes (which include new and improved bus services, car clubs and a bike hire scheme) contained as policy requirements on the strategic allocations will provide a realistic alternative to car travel for those who choose to take the opportunity to do so.
ANON-QNH5-RDAU-8	Alex Cole	On behalf of an Organisation	Pigeon (Takeley) Ltd	Employment Sites - Mobility Hubs	Pigeon supports the principle that sustainable transport and connectivity should be provided where appropriate, but the policy applies a blanket requirement and fails to recognise operational requirements of employment-generating uses. The requirement that all strategic allocations delivery mobility hubs close to on-site community facilities fails to recognise that not all of the allocations will be providing	The Council is content that the policy approach outlined in Core Policy 26 is appropriate and proportionate in relation to the delivery of a range of sustainable transport measures that provide the opportunity and choice for those who work and have to access employment sites. The Policy does require that development proposals should prioritise sustainable transport interventions and details a range of measures that should be provided. All strategic employment allocations and development proposals are expected to contribute towards transport infrastructure proposals including active travel and sustainable transport connections. The local plan evidence has undertaken an appropriate and proportion appraisal regarding the feasibility and delivery of the infrastructure required

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					<p>community facilities, and the provision of a mobility hub may not constitute the best and most effective use of land for certain employment sites. Greater flexibility should be applied to the policy.</p> <p>The following amendments should be made to Core Policy 26:</p> <p>All strategic developments as set out in Chapter 4 and the Area Strategies will be expected, where relevant planning and development considerations allow, to provide direct bus access, rapid electric charging points and a shared mobility scheme.</p> <p>Where appropriate, priority should be given to cycle and pedestrian movements and providing access to public transport including the provision of new or enhanced existing bus services.</p> <p>Where relevant planning and development considerations allow, strategic allocations will should deliver mobility hubs in accessible locations which are close to community facilities on site and provide sustainable connections to wider services. These mobility hubs will should provide access to bus services in a convenient location including provision for measures included in the shared mobility scheme such as cycle hire, cargo bikes and a development wide car club.</p> <p>Development proposals should seek where reasonable to provide the following sustainable measures:[...]"</p>	to deliver the strategic allocations. CoMoUK and transport consultants have considered that the delivery of the shared mobility schemes (which include new and improved bus services, car clubs and a bike hire scheme) contained as policy requirements on the strategic allocations will provide a realistic alternative to car travel for those who choose to take the opportunity to do so. The Council does not consider that a modification is required to the policy.
ANON-QNH5-RDEP-7	Martin Crisp	On behalf of an Organisation	Essex Bridleways Association	Equestrian and disabled users	The respondent believes that Core policy 26 needs amending to state that the default for all walking and cycling routes is that they should be safe and accessible for equestrians who are the most vulnerable road users. This is required to make the local plan sound and indiscriminatory. Similarly, There also appears to be little or no provision for disabled users.	<p>The Council is satisfied that the policy approach in the Local Plan is appropriate and considers the needs of equestrians and disabled users. Core Policy 26 specifically states that “Provision should be inclusive and address disabled users and those with mobility needs”. The policy goes on to require: “ensure that existing pedestrian and cycling routes and Public Rights of Way are retained as continuous linear features and improved where appropriate.”</p> <p>Core Policy 28 re-iterates these requirements.</p> <p>Furthermore Core Policy 26 states that “cycling and walking routes should be planned, where possible, as part of the network of multi-functional green infrastructure.” This reference to multi-functional green infrastructure recognises that active travel routes can be deliver wider benefits and allows for opportunities for improvements to the equestrian network to be considered where appropriate.</p> <p>Core Policy 30: Public Rights of Way states that development proposals will have to protect, enhance and promote the PROW network, which included the network of public bridleways across the district.</p>
ANON-QNH5-RDMM-C	Christine Griffin	On behalf of an Organisation	Newport Parish Council	Infrastructure in Newport and North Uttlesford	Newport Parish Council highlights that the services available in Newport are overstated. Paragraph 9.61 incorrectly refers to "frequent bus services" to Stansted Airport, as there is no direct bus service from Newport or other villages north of Stansted Mountfitchet. This is inconsistent with paragraph 9.66, which states that these villages have "less good access," which the respondent interprets as inadequate access. Newport Parish council propose that the plan should clarify the actual bus services available, particularly in North Uttlesford, and accurately state the poor access in villages. They also suggest	<p>In Newport, the Neighbourhood Plan will need to ensure that it contains up to date information on public transport and that it adequately addresses how any development sites proposed in the Neighbourhood Plan will deliver sustainable transport.</p> <p>The Council aims to address any transport infrastructure pressures resultant from future growth within Uttlesford through policies in the Local Plan, specifically Core Policies 26, 27 & 28. The Council is content that the policy approach outlined in Core Policy 26 does support the delivery of a range of sustainable transport measures that provide the opportunity and wider transport choice for those in new communities and existing residents. The Policy does require that development proposals should prioritise sustainable transport interventions and details a range of measures that should be provided. In addition, the transport evidence and Infrastructure Delivery Plan has identified specific schemes addressing sustainable transport and connectivity and particularly to increase the frequency of bus services to provide enhanced connections to a range of services. Providing enhancements to existing services and routes is considered to be more effective than diverting services into development sites.</p>

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					referencing any submissions made to Essex County Council regarding the Local Transport Plan (LTP4).	Stansted Mountfitchet, Newport and Elsenham are sustainable settlements with good public transport connections and railway stations - in an Uttlesford context these are very sustainable locations that compare favourably to many alternatives. All strategic allocations and development proposals are expected to contribute towards transport infrastructure proposals including the consideration of active travel and sustainable transport connections. There are regular bus services that run from Newport towards Saffron Walden and Bishops Stortford that offer a sustainable transport option to local services. Para 9.61 does represent an accurate high-level summary of bus services in the district, however, it is accepted whilst there are no direct bus services between Newport and the Airport, the airport is accessible by rail services in around 30mins with a change at Audley End.
ANON-QNH5-RDT1-Q	Sharon Critchley	Individual / member of the public		Not qualified to comment	The respondent states they are not qualified to comment on the legality of the plan.	The comments are noted and the Council appreciates the Respondent's involvement within the Regulation 19 consultation.
ANON-QNH5-RD4S-S	Bill Critchley	Individual / member of the public				
ANON-QNH5-RDXS-W	Brenda Barrett	On behalf of an Organisation	High Roding Parish Council	Proposed amendments - High Roding Parish Council	High Roding Parish Council welcomes paragraph 9.66. The Parish Council would like to see Uttlesford District Council and Essex County Council having a more cohesive and collaborative approach to sustainable bus services. High Roding Parish Council request that the wording in para 9.66 should be amended to read <i>'While public transport links are available for some towns along the key transport corridors, villages are more remote with either limited or no access to public transport'</i> .	The Council is satisfied that the policy as set out in Core Policy 26: Providing for Sustainable Transport and Connectivity is acceptable and provides the assurances that High Roding Parish Council are requesting in relation to service provision on more rural areas. The Policy states: "The Council will support measures identified in the Essex Local Transport Plan and the area travel plans and work with Essex County Council to ensure that transport improvements contribute positively to the attractiveness and safety of our places, quality of life, and respond sensitively to our natural and historic environment." This approach will enable the Council to work with Essex County Council on sustainable transport improvements in all areas of the District.
ANON-QNH5-RDZN-T	Fiona Martin	On behalf of an Organisation	Natural England	Proposed amendments - Natural England	Natural England welcomes the inclusion of policies on providing for sustainable transport, connectivity and active travel. Core Policy 26 should be updated to include the following requirements for all new development and infrastructure proposals: <ul style="list-style-type: none"> • provide well signposted routes to give residents confidence in their use; and, • consider appropriate lighting that balances residents' needs to feel safe when walking or cycling within green infrastructure corridors and the needs of wildlife, such as bats, that may use these corridors to connect between areas of semi natural habitat. 	The Council welcomes Natural England's support for Core policy 26. The Council will consider the proposed modifications to Core policy 26.
ANON-QNH5-RD7U-X	Saffron Walden Town Council	On behalf of an Organisation	Saffron Walden Town Council	Stansted Airport Multi-Modal Interchange	Saffron Walden Town Council request that the following amendments are made: Paragraph 9.60, "there is a bus and coach interchange at London Stansted Airport which provides convenient integrated access" Paragraph 9.61: Strengthen this requirement from "should	The Council welcomes the comments made by Saffron Walden Town Council, however, the information as set out at 9.60 & 9.61 is appropriate and effective in setting out the position and is supported by requirements in CP11 to provide enhancements to the multi-modal transport hub at Stansted Airport.

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					<p>be considered” to “must be considered and implemented” with reference to improved connections between Saffron Walden, Cambridge and London Stansted Airport.</p> <p>Strengthen the statement and amend to read:</p> <p>“Opportunities to provide local multi-modal transport hubs should be considered at strategic locations, especially Saffron Walden being located between London Stansted Airport and Cambridge.”</p> <p>Throughout the Plan, design guides are referred to and it should be clear in each case whether this is Uttlesford’s or Essex County Council’s. The Plan must be consistent in which document it refers to, i.e., by adding the appropriate footnotes.</p> <p>Core Policy 26: We support mobility hubs and urge UDC to work with town/parish councils to make full use of local experience and knowledge in this connection. The Highway Code hierarchy should be mentioned. Reword “development proposals should” to “must”. Add: Council will work with ECC, and parish councils include reference to the road user hierarchy.</p>	
ANON-QNH5-RD4R-R	Roy Warren	On behalf of an Organisation	Sport England	Support	<p>Supportive comments were received from the following organisations:</p> <ul style="list-style-type: none"> -A number of individual respondents -Bloor Homes, noting its conformity with national policy. - Great Dunmow Town Council, noting its conformity with Chapter 9 of the NPPF. - Portland Capita, broadly supporting the policies that relate to transport. -Gladman Developments Ltd, supportive of the importance of sustainable transport. 	Support noted and welcome.
ANON-QNH5-RDYM-R	Brian Flynn	On behalf of an Organisation	Bloor Homes (Agent: Carter Jonas)			
ANON-QNH5-RDC1-6	Paul Anderson	Individual / member of the public				
ANON-QNH5-RDN8-R	Great Dunmow Town Council	On behalf of an Organisation	Great Dunmow Town Council			
ANON-QNH5-RDAX-B	Tom Vernon (Agent)	On behalf of an Organisation	Portland Capita			
ANON-QNH5-RDRS-Q	Richard Agnew	On behalf of an Organisation	Gladman Developments Ltd			

Core Policy 27: Assessing the impact of Development on Transport Infrastructure

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RDCT-9	Sophie Pain	On behalf of an Organisation	Pigeon	Community Infrastructure Levy Regulations	Pigeon broadly supports the policy's principles, particularly the securing of public transport improvements through contributions or infrastructure funding. However, they emphasise that any obligations must comply with Regulation 122 of the Community Infrastructure Levy Regulations 2010, and this should be explicitly mentioned in the policy.	Core Policy 27 relates to the measures and processes that development proposals are required to undertake in relation to assessing the impact of development proposals on transport infrastructure. The Council notes the points made by the respondent; however, it is felt that the suggested amendments are not necessary as all planning obligations will have to be in accordance with the appropriate regulatory framework. The NPPF requires that transport issues should be considered at the earliest stages of plan making including

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					They also request clarification on the scope of the Transport Related Carbon Emissions Quantification Statement within the policy, and suggest minor wording amendments to improve clarity. The respondent suggests that the wording of the policy should include that "any obligations sought must be in accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, or successor legislation" . In addition, development proposals should implement the measures listed in the policy "where possible" .	the assessment of the potential impacts of development on the transport network. The NPPF requires that any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
BHLF-QNH5-RDEH-Y	Essex County Fire and Rescue Service	On behalf of an Organisation	Essex County Fire and Rescue Service	Fire safety	The Essex Fire and Resue Service have stated that new developments should be planned with land management techniques that minimise the potential for fire spreading and to ensure access roads are designed to accommodate fire appliances.	The Council is confident that the policies in the local plan will provide the framework to ensure that development proposals deliver the appropriate road and infrastructure design to support fire and emergency vehicles. The policy requires that developments proposals comply with the latest guidance on design, parking provision and servicing facilities. Full details for the design of roads and streets is contained in the Essex Design Guide and the Uttlesford Design Code. The Fire and Rescue Service will also be consulted on individual proposals through the development management process.
ANON-QNH5-RDUP-Q	Loftus Buhagiar	Individual / member of the public		Local Plan proposed growth - alignment with Core Policy 27.	The Respondent feels that the development proposed within Dunmow doesn't align with Core Policy 27 as it is not proposed near services and facilities or sustainable transport links.	Core Policy 27 relates to the measures and processes that development proposals are required to undertake in relation to assessing the impact of development proposals on transport infrastructure. The NPPF requires that transport issues should be considered at the earliest stages of plan making including the assessment of the potential impacts of development on the transport network. The NPPF requires that any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree. Specific details on transport proposals for Great Dunmow are contained within Core Policies 10, 13 & 14.
ANON-QNH5-RD7U-X	Saffron Walden Town Council	On behalf of an Organisation	Saffron Walden Town Council	Policy Amendments	Saffron Walden Town Council propose the following change: "Development proposals must instead of should".	The Council notes the recommendations by the Town Council but does not consider that the policy requires modification.
ANON-QNH5-RD1W-T	Zhanine Smith	On behalf of an Organisation	Essex County Council	Policy Amendments - Essex County Council	Essex County Council considers that paragraph 9.84 is unclear with regards to the delivery of highway mitigation. As stated in the ECC Developers' Guide to Infrastructure Contributions, highway mitigation is undertaken by the developer rather than receipt of financial contributions. An amendment is required to ensure due regard is given to the ECC Highways Development Management Policy DM20. The need for a Construction Management Plan is also clearly articulated within the ECC Development Construction Manual (2024). Paragraph 9.84 and Core Policy 27 (ii) should be amended to state: "Highway mitigation should be delivered directly by the developer via Section 278 having regard to the ECC Developers' Guide for Infrastructure Contributions. In exceptional circumstances pooled contributions may be required where mitigation cannot be apportioned to a single allocation/development". Core Policy 27 should be amended to include the following: "A Construction Management Plan is submitted and agreed with the Highway Authority prior to commencement, with before and after condition surveys as appropriate".	The Council welcomes the comments made by Essex County Council and accepts that the proposed changes are reasonable and add clarity. The requested modifications will be submitted to the Inspector for consideration.
ANON-QNH5-RDMM-C	Christine Griffin	On behalf of an Organisation	Newport Parish Council	Proposals for North Uttlesford, Travel Plans	Newport Parish Council supports the objective in paragraph 9.84, which aims to deliver infrastructure for sustainable travel and improve the road network. However, they note the absence of further references or details regarding proposals for North Uttlesford. They suggest that Travel Plans should include proposals for improvements to be made to	The Council welcomes the support of Newport Parish Council for Core Policy 27. This policy applies to all development proposals in the District and it is not appropriate in this policy to list specific proposals or schemes in North Uttlesford. Such schemes or interventions are dealt with in the area based policies in the Plan. There are specific requirements set out in National and Essex County Council Policy that need to be followed when undertaking travel plans, transport assessments and transport statements and it is not appropriate in this policy to define the nature of these processes any further than is set out in the policy.

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					the local and strategic road network or clearly state why improvements are not required.	
ANON-QNH5-RD4S-S	Bill Critchley	Individual / member of the public		Rail	The respondent notes that the plan does not include any land to support rail expansion. The following rail expansions should be considered: extend the Stansted loop to provide a direct northerly route to Cambridge and onwards and provide a freight hub to support the industrial development, Stansted North. Bishops Stortford is recognised within the National Infrastructure Committee as being in the bottom ten towns for BUA.	Core Policy 27 relates to the measures and processes that development proposals are required to undertake in relation to assessing the impact of development proposals on transport infrastructure. The NPPF requires that transport issues should be considered at the earliest stages of plan making including the assessment of the potential impacts of development on the transport network. The NPPF requires that any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree. The Council does not consider the proposals set out by the respondent in relation to rail infrastructure are justified by the available evidence nor are they deliverable with the proposed level of growth in Uttlesford. The approach proposed in the Local Plan is proportionate and deliverable.
ANON-QNH5-RDN8-R	Great Dunmow Town Council	On behalf of an Organisation	Great Dunmow Town Council	Support	Supportive comments were received from the following organisations: - Great Dunmow Town Council, noting its conformity with Chapter 9 of the NPPF and Policy: DS8: Building for Life of the Great Dunmow Neighbourhood Plan. - Portland Capita, broadly supporting the policies that relate to transport.	The support from Great Dunmow Town Council and Portland Capita is noted and welcomed.
ANON-QNH5-RDAX-B	Tom Vernon (Agent)	On behalf of an Organisation	Portland Capita			
ANON-QNH5-RDM6-N	Charlie Thompson	On behalf of an Organisation	Hertfordshire County Council	Support - Hertfordshire County Council	Supportive comments were received from Hertfordshire County Council, noting that the general direction of this policy is welcome and accords with HCC's LTP4. HCC notes the key messages from LTP4 which provide context to the representation and suggest the policy could be strengthened regarding cross boundary travel into and from Hertfordshire. Bus services are a particularly important cross boundary link and policy reference to reinforcement of these would help mitigate this impact. Hertfordshire County Council confirms that Education and Minerals and Waste colleagues have been engaged through the Statement of Common Ground, Infrastructure Delivery Plan, and Regulation 18 consultation, but have no further comment to make.	The Council welcomes the support of Hertfordshire County Council to the general direction of the policy. The Council acknowledges the requirements of the Herts LTP4 and the need for cross border co-operation. The Council believes that the approach in the policy is appropriate and provides the framework to ensure that impacts on the transport network are assessed, including assessing connections into Hertfordshire. While the Council acknowledges HCC's request for the policy to be strengthened in relation to cross-boundary travel, including bus services, it does not consider that the proposed modification is necessary.

Core Policy 28: Active Travel – Walking and Cycling

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RDCT-9	Sophie Pain	On behalf of an Organisation	Pigeon	Core Policy 28 - too restrictive	Pigeon supports the commitment to safe and accessible active travel. The policy is overly restrictive and does not recognise that different sites do not need to meet all listed measures. The policy should be amended to make it clear that the requirements apply subject to their appropriateness. Wording should be amended as follows: “ All new Subject to viability, and other relevant planning and development considerations , development and infrastructure proposals should seek to [...]”	The Council is satisfied that the proposed aims of Core Policy 28, when considered with the Area Strategies and other transport policies, constitutes a reasonable and appropriate approach to delivery of active travel. Development proposals will be required to assess the transport impacts in further detail and submit a transport assessment. The transport assessments will need to address the proportionate delivery of active travel infrastructure in combination with detailed discussions with the highway authority. These assessments and the supporting details of the planning proposal will naturally consider the viability of delivery of all infrastructure requirements and take into account other relevant planning considerations, therefore, the suggested modification is not required.
ANON-QNH5-RDAU-8	Alex Cole	On behalf of an Organisation	Pigeon (Takeley) Ltd			
ANON-QNH5-RDT1-Q	Sharon Critchley	Individual / member of the public		Cycle lanes	The respondent states that there are no cycle routes to Stansted Airport and that Flitch Way is not a cycle way, it is a Country Park. The respondent also feels they are not qualified to comment on the legality of the Local Plan.	Flitch Way is designated as a Public Right of Way and therefore is a key access route for all forms of active travel. As detailed within the Area Strategy, active travel routes enhancements are proposed within the Stansted and Elsenham area. In addition, schemes have been identified within the Essex Local Cycling and Walking Infrastructure Plan which includes routes to Stansted Airport. The Council has included enhancement and upgrades works to cycling and walking infrastructure within the Local Plan to connect up to any schemes proposed by Essex County Council.

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ANON-QNH5-RD4S-S	Bill Critchley	Individual / member of the public		Electric bikes	Whilst e-bikes and e-scooters may provide a low carbon transport option for short journeys and the impact of them must be considered. There can be safety issues associated with some users of electric bikes. In addition, pavements are not wide enough to accommodate cyclists and pedestrians. Any plans put forward to increase the use of electric bikes must comply with Active Travel Policy.	The Council is satisfied that the proposed aims of Core Policy 28, when considered with the Area Strategies and other transport policies, constitutes a reasonable and appropriate approach to delivery of active travel. The sustainable transport evidence recommends that electric bicycles should be implemented and are just one strand of a comprehensive range of sustainable transport interventions that should be delivered which will also include public transport interventions, car clubs and the co-location of these services in transport/mobility hubs. The type of electric bicycles proposed are the same as those currently successfully operating in the town and will meet all UK regulations. There is no evidence from the current scheme that there are any safety issues.
ANON-QNH5-RDW1-T	Teresa Hudson	On behalf of an Organisation	British Horse Society	Equestrians and wheelchair users	A number of respondents feel that references to walking and cycling should include equestrians and wheelchair users as well. Cycle lanes should be accessible to equestrians and wheelchair users. Public rights of way should be preserved, protected and enhanced. Natural surfaces and appropriate surface materials that are suitable for all users should be used. Crossings/bridges/underpasses should be designed to include equestrians. Equestrians are identified as equal to cyclists in the Highway Code hierarchy of road users. Any newly constructed paths should be integrated/physically linked with the existing public rights of way network where possible and needed, clearly waymarked and recorded on either the definitive map or another publicly accessible map as appropriate. New green infrastructure should be for all vulnerable road users unless there is a specific, unresolvable reason not to do so.	The Policy clearly states that active travel provision should be inclusive and address disabilities and particular mobility needs and should ensure that existing pedestrian and cycling routes and Public Rights of Way are retained and enhanced as continuous linear features Public Rights of Way are specifically protected under Core Policy 30. The precise nature of any resurfacing of PROW and active travel routes will be considered on a case by case basis, and any decisions on these matters will take into account safety for all users, balanced against the needs to make routes more accessible for disabled users. If the route is a bridleway or expected to be used by equestrians then the active travel and PROW scheme will require that their needs are accounted for and the appropriate infrastructure delivered including surfacing, crossings and bridges. The Council does not consider that a specific reference to equestrian users is required.
ANON-QNH5-RDEP-7	Martin Crisp	On behalf of an Organisation	Essex Bridleways Association			
ANON-QNH5-RDHK-5	Jackie Deane - Parish Clerk	On behalf of an Organisation	Takeley Parish Council	Feasibility of the active travel corridor along Parsonage Road and proposed bus links	Takeley Parish Council believes that the lack of supporting evidence to establish the feasibility of the active travel corridor along Parsonage Road suggests that this policy, or at least the policies that link with this policy and refer to the active travel corridor along Parsonage Road in Takeley are neither justified nor effective. Takeley Parish Council state that it appears that a facility that meets appropriate standards may not be practically deliverable along Parsonage Road and there has been no commitment on the part of Stansted Airport to provide the land or infrastructure to continue any route into the airport. A review of the proposed bus route between the site and Stansted Airport reveals that it would not generate sufficient revenue to secure its longer-term operation since it would serve only the proposed allocation site. Takeley Parish Council are uncertain whether the proposed bus route could be implemented since a separate planning application to the Secretary of State would be required in order to develop land, crossed by the route at Smith Green, that has the status of registered village green. Additionally they believe that the proposed bus access strategy for the allocation fails to provide any quality bus services from the site to Great Dunmow or Bishops Stortford, the main local service centres. Evidence suggests that the proposed bus infrastructure between the proposed Takeley allocation and Stansted Airport may present viability issues as it has not been allowed for in the latest viability assessments. These assessments indicate that the level of financial surplus generated by the development at Takeley is one of the tightest tested. The Parish Council suggests that Core Policy 10 should be modified to comply with Core Policy 28 but does not set out alternative policy wording.	The Council is satisfied that the proposed aims of Core Policy 28, when considered with Core Policy 14 and Core Policy 10, constitutes a reasonable and appropriate approach to delivery of active travel. 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 Airport interchange allows for connections onto rail services to London, Birmingham, Cambridge and Norwich, together with an extensive range of local and regional bus and coach connections. The emerging Uttlesford Local and Cycling Infrastructure Plan (LCWIP) and the Essex LCWIP both propose enhanced connections between Takeley and the Airport. The production of the LCWIP follow strict DfT methodology guidelines and it is clear from the emerging LCWIP reports that strategic connections to the airport should be delivered. The Airport is the largest area of employment in Uttlesford (and the whole of Essex), has a transport interchange and is closely located to the strategic growth site in Takeley. Therefore, it is prudent for the Council to plan for active travel connections to the site. The Airport has its own targets which should be set out in its Sustainable Development Plan and Surface Access Strategy which are required to enable more people to access the Airport by sustainable and active travel modes. The existing Airport Strategy references the need to improve active travel connections to 'key local settlements.' The active travel route between Takeley and the Airport is therefore safeguarded and development proposals on the strategic allocations in Takeley will have to consider and propose how the route is to be delivered to facilitate active travel to the multi-modal interchange at the Airport. The safeguarding policy will allow feasibility work to be undertaken, including consideration of deliverability and land ownership on the safeguarded land and sustainable transport routes in the South area. The Council will continue to work with STAL on the nature of the active travel route 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.

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						It is unclear what modification is being sought to Core Policy 10 as no alternative policy wording has been provided, but the Council does not consider that further modification is required.
ANON-QNH5-RD1Q-M	clerk to Stebbing Parish Council	On behalf of an Organisation	Stebbing Parish Council	Improving connections	Stebbing Parish Council supports Core Policy 28 but would suggest that it could be improved to encourage more active travel. New developments should connect to existing footpaths and Public Rights of Way. The policy could consider the use of byways and a pilot or trial on certain Byways to restrict to only farm vehicles to allow for the promotion of Active Travel.	The Council welcomes the comments made by Stebbing Parish Council. The Council is satisfied that the proposed aims of Core Policy 28, when considered with the Area Strategies and other transport policies, constitutes a reasonable and appropriate approach to delivery of active travel. The Policy clearly states that active travel provision should ensure that existing pedestrian and cycling routes and Public Rights of Way are retained and enhanced as continuous linear features and that new links and routes should be provided. Core Policy 30 proposes a comprehensive approach to the consideration of Public Rights of Way in development proposals including the provision of new links to connect to the existing PROW network. Informal access issues are also considered in Core Policy 39: Green and Blue Infrastructure. Development proposals can promote Traffic Regulation Orders to prohibit certain types of users on Byways. This will be considered on a case by case basis through the planning system and through discussions with the highway authority. The Council does not consider that amending the policy to include reference to pilot or trial schemes is required.
ANON-QNH5-RDYM-R	Brian Flynn	On behalf of an Organisation	Bloor Homes (Agent: Carter Jonas)	Policy consistency	Bloor Homes state that Core Policy is consistent with the NPPF but note some overlap between Core Policies 26 and 28 in terms of both policies relating to walking and cycling. They note that the proposed site allocation policy for Land East of Station Road in Elsenham includes requirements for active travel routes and state that the proposed allocation would be consistent with the requirements of Core Policy.	The Council welcomes the support of Bloor Homes and the specific comments on the consistency between the site allocation at Elsenham and the requirements of the policy. Core Policy 26 provides the high level policy requirements in relation to sustainable transport whereas Core Policy 28 provides further policy requirements that cover active travel. Both policies are required to ensure the delivery of sustainable transport modes including active travel across Uttlesford.
ANON-QNH5-RD7U-X	Saffron Walden Town Council	On behalf of an Organisation	Saffron Walden Town Council	Suggested Amendments	Saffron Walden Town Council state that Paragraph 9.89 should be amended to state: "...the marketing and promotion of public transport which must be "affordable, reliable, integrated and clean". It would be helpful if the plan defines what is considered to be a Public Right of Way. It is necessary to clarify that all established rights of way are protected. The policy should refer to informal unregistered routes.	The Council welcomes the comments of Saffron Walden Town Council, however, the Council is satisfied that the proposed aims of Core Policy 28, when considered with the Area Strategies and other transport policies, constitutes a reasonable and appropriate approach to delivery of active travel. Public Rights of Way are considered in Core Policy 30 which proposes a comprehensive approach to the consideration of Public Rights of Way in development proposals including the delivery of new links which could include formalising existing informal routes into development proposals where there is a clear benefit. It is difficult to define 'informal unregistered routes' and such a reference is not needed. Recreational access and connectivity, which could include existing informal routes, is also considered in Core Policy 39: Green and Blue Infrastructure. There is a formal statutory process for adding PROW to the Definitive Map to ensure that they become 'registered' and therefore protected under highway law. The Council notes the request to define Public Rights of Way, but does not consider that this is a necessary addition to the plan.
ANON-QNH5-RD1W-T	Zhanine Smith	On behalf of an Organisation	Essex County Council	Suggested Amendments by ECC	Essex County Council feel that the supporting text and Core Policy 28 could be strengthened with reference to Sport England Active design Principles. This would support and link to Core Policy 52. Paragraphs 9.91 to 9.96 should be amended and Core Policy 28 to reference information from the Essex Healthy Places Guidance (Essex Design Guide) and Sport England Active Design Principles. This has been adapted and embedded into the Essex Healthy Places Guidance comprising part of the Essex Design Guide. The Policy should cross reference Core Policy 66 and how applicants will need to demonstrate the application of Core Policy 28 within the design and access statement, Health Impact Assessment and associated Active Design checklist. ECC's Developers' Guide for Infrastructure Contributions provides clear guidance on the environment expected around schools. Amend Core Policy 28 by adding an additional paragraph stating: "To deliver a safe environment around schools, and facilitate walking and cycling, new schools must front on to substantial pedestrianised public realm that does not abut roads or parking."	The Council welcomes the comments made by Essex County Council and the suggested amendments. The Council is satisfied that the proposed aims of Core Policy 28, when considered with the Area Strategies and other transport policies and Core Policy 52, constitutes a reasonable and appropriate approach to delivery of active travel, and does not propose to include the suggested modifications.

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RD4R-R	Roy Warren	On behalf of an Organisation	Sport England	Support	Supportive comments were received from the following organisations: - Essex County fire and Rescue Services, supporting the creation of safe cycle lanes. - Sport England, supporting its promotion of active travel and the recognition that active travel supports healthy and active lifestyles and noting it meets the requirements in paragraph 96(c) of the NPPF. - Great Dunmow Town Council, noting its conformity with Chapter 9 of the NPPF and Policies: GA2 Integrating Developments (Paths and Ways) and GA1: Core Footpath and Bridleway Network of the Great Dunmow Neighbourhood Plan. - Portland Capita, broadly supporting the policies that relate to transport. - Gladman Developments Ltd who note that they are exploring ways in which their site interests can supportive the policy objectives	The Council notes and welcomes the supportive comments.
ANON-QNH5-RDN8-R	Great Dunmow Town Council	On behalf of an Organisation	Great Dunmow Town Council			
ANON-QNH5-RDAX-B	Tom Vernon (Agent)	On behalf of an Organisation	Portland Capita			
ANON-QNH5-RDRS-Q	Richard Agnew	On behalf of an Organisation	Gladman Developments Ltd			
BHLF-QNH5-RDEH-Y	Essex County Fire and Rescue Service	On behalf of an Organisation	Essex County Fire and Rescue Service			
ANON-QNH5-RDN8-R	Great Dunmow Town Council	On behalf of an Organisation	Great Dunmow Town Council			

Core Policy 29: Electric and Low Emission Vehicles

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RD7U-X	Saffron Walden Town Council	On behalf of an Organisation	Saffron Walden Town Council	Core Policy 29 - proposed amendment	Saffron Walden Town Council recommend the following change to Core Policy 29: “All development proposals should must maximise”.	The Council is satisfied the word 'should' is appropriate in this regard.
ANON-QNH5-RDAU-8	Alex Cole	On behalf of an Organisation	Pigeon (Takeley) Ltd	Core Policy 29 - restrictive	A number of comments refer to the restrictive nature of the policy, including: • Note that the policy provides no further information on the quantum and specification required in relation to electric vehicle charging. There is reference to compliance with latest standards and guidance (Essex EV Infrastructure Strategy), but the guidance is in draft form and does not set any requirements for quantum or specification. NPPF paragraph 16 requires policies to be clearly written and unambiguous so requirements are clear. Requirements on Electric vehicle charging provision need to be clarified, and when specifying requirements consideration should be given to their likely use. • Uttlesford District Council should provide electric vehicle charging points on all publicly owed land including land owned by Parish Councils. • The requirement to provide charging for electric and low emission vehicles for each dwelling is set out in Building Regulations and therefore Core policy 29 is unnecessary.	In almost all new and retrofit properties, the latest Building Regulations require you to install at least one EV charger. However, the rules vary depending on the size and use of the building. Core Policy 29 is further supporting Building Regulations but wanting developers to be ambitious and increase electric vehicles charging where possible within a development. The policy also supports charging infrastructure for bicycles and facilities for mobility scooters. The policy also supports the principles and requirements set out within the Essex EV Infrastructure Strategy. The Council is content that the approach as set out in Core Policy 29 and elsewhere in the Plan is appropriate and proportionate in relation to EV charging infrastructure. The Local Plan includes policies that facilitate the transition to low emission vehicles. Given the diversity of the size, location and operation of potential charging infrastructure and the ever changing technologies, it is not considered appropriate to reference specific standards or quantum that may quickly change over time. The latest Building Regulations provides the technical guidance regarding the installation and charge point requirements. The requirement for development proposals to deliver EV charging is also referenced in Core Policy 31: Parking Standards.
ANON-QNH5-RD3H-D	Kim Rickards	On behalf of an Organisation	Durkan Estates Ltd			
ANON-QNH5-RDC4-9	Margaret Shaw	Individual / member of the public				
ANON-QNH5-RDCT-9	Sophie Pain	On behalf of an Organisation	Pigeon			
ANON-QNH5-RD7K-M	David Poole	On behalf of an Organisation	Weston Homes			

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RDN8-R	Great Dunmow Town Council	On behalf of an Organisation	Great Dunmow Town Council	Core Policy 29 - Support	Great Dunmow Town Council welcomes Core Policy 29 and judges the policy to be sound. Core Policy 29 is in agreement with Chapter 14 of NPPF. Portland Capita broadly support the policies that relate to transport.	Support noted and welcome.
ANON-QNH5-RDAX-B	Tom Vernon (Agent)	On behalf of an Organisation	Portland Capita			
ANON-QNH5-RD7K-M	David Poole	On behalf of an Organisation	Weston Homes	Electric vehicle charging	Two comments were received in relation to EV charging infrastructure. One respondent notes that the policy does not specify quantum and specification of electric vehicle charging to be required and nor is this included in the draft Essex guidance. They seek modification to the policy to remove the word "rapid" in relation to electric charging points to remove any ambiguity. Pigeon, a site promoter, request flexibility in the policy in the event that factors outside the applicant's control will not allow for the delivery of rapid chargers, for example insufficient national grid capacity. They also recommend making the requirements proportionate to the scale of the development and, for strategic allocations.	The Council is content that the approach as set out in Core Policy 29 and elsewhere in the Plan is appropriate and proportionate in relation to EV charging infrastructure and that no modification is required to the policy. The Local Plan includes policies that facilitate the transition to low emission vehicles. Given the diversity of the size, location and operation of potential charging infrastructure and the ever changing technologies, it is not considered appropriate to reference specific standards or quantum that may quickly change over time. The latest Building Regulations provides the technical guidance regarding the installation and charge point requirements. The requirement for development proposals to deliver EV charging is also referenced in Core Policy 31: parking Standards.
ANON-QNH5-RDCT-9	Sophie Pain	On behalf of an Organisation	Pigeon			
ANON-QNH5-RD3H-D	Kim Rickards	On behalf of an Organisation	Durkan Estates Ltd	Requirement set out in Building Regulations	Durkan Homes feel that Core Policy 29 is unnecessary as the requirement is set out in Building Regulations.	In almost all new and retrofit properties, the latest Building Regulations require you to install at least one EV charger. However, the rules vary depending on the size and use of the building. Core Policy 29 is further supporting Building Regulations but wanting developers to be ambitious and increase electric vehicles charging where possible within a development. The policy also supports charging infrastructure for bicycles and facilities for mobility scooters. The policy also supports the principles and requirements set out within the Essex EV Infrastructure Strategy. The Council is content that the approach as set out in Core Policy 29 and elsewhere in the Plan is appropriate and proportionate in relation to EV charging infrastructure. The Local Plan includes policies that facilitate the transition to low emission vehicles. Given the diversity of the size, location and operation of potential charging infrastructure and the ever changing technologies, it is not considered appropriate to reference specific standards or quantum that may quickly change over time. The latest Building Regulations provides the technical guidance regarding the installation and charge point requirements. The requirement for development proposals to deliver EV charging is also referenced in Core Policy 31: Parking Standards.
ANON-QNH5-RD9X-3	Lorraine Flawn	On behalf of an Organisation	Takeley Neighbourhood plan team	Sustainable travel	The use of electric bikes has the potential to help reduce reliance on private cars. A change in how we travel is necessary and policies should be developed to encourage more sustainable movement. The best approach to achieve this is through cooperation which different people.	The policy also supports charging infrastructure for bicycles, cargo bikes and facilities for mobility scooters. The requirement for development proposals to deliver charging in secured cycle parking is contained in Core Policy 31: Parking Standards.

Core Policy 30: Public Rights of Way

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RDHJ-4	Pascale Muir	Individual / member of the public		Active travel route - proposed Church End East site through the grounds of St Mary's Church	The respondent requests clarification for how the council proposes to accommodate the conflict between vehicular traffic using the private Bigod's Lane and active travellers in relation to the proposed route from Church End East site through the church grounds of St Mary's Church.	The Council is satisfied that the proposed aims of Core Policy 30, when considered with the Area Strategies and other transport policies, constitutes a reasonable and appropriate approach to the protection and enhancement of public rights of way including Bigods Lane. Bigods Lane is currently a public bridleway which means that horseriders, cyclists and pedestrians can currently legitimately use the lane. All users have to be mindful of other users and give way as necessary, i.e. cyclists should give way to pedestrians and equestrians on bridleways. Motorised users must give way to other users, even if they are exercising a private right of access. The route does provide the opportunity for new and existing residents to access the wider PROW network in the area and this usage may see some intensification following the delivery of the site allocations in the area. The policy proposes a comprehensive approach to the consideration of public Rights of Way in development proposals including whether any further interventions may be required on Bigods Lane. Developers obligations will be sought towards any PROW improvements with further details considered at planning application stage.
ANON-QNH5-RD4S-S	Bill Critchley	Individual / member of the public		Flitch Way	A Respondent highlights the importance of Flitch Way for sustainable travel. However, another Respondent notes that the Local Plan fails to recognise that Flitch Way is a linear country park. Any proposed works on Flitch Way is contrary to many of the Core Policies within the Local Plan. In addition, prior to carrying out any works on the Flitch Way, the route of the High Pressure Gas Main must be tracked. A thorough risk analysis must be carried out to ensure that any damage, ecological and environmental impact is properly assessed.	The Council notes and welcomes Essex Bridleways Association's support for Core Policy 30. Flitch Way is recognised as an important route and is formally designated as a County Wildlife Site and Public Bridleway, rather than Country Park. The Spatial Strategy (page 38) supports improvements to access and usability of the Flitch Way in the south as a strategic linear route. The Flitch Way has the potential to act as a sustainable travel corridor, and as set out in Core Policy 13 and the supporting text the Council is preparing a programme of works to deliver improvements to this key route which includes the provision of ""multi-functional surfacing for all users"". The precise nature of any resurfacing has not yet been determined, and any decisions on these matters will take into account safety for all users, balanced against the needs to make the Flitch Way more accessible, including to those who are prevented from using it due to its current condition. As set out in paragraph 6.55 of the Plan, a costed programme of works is being developed which will consider how the Flitch Way can be connected to communities such as Takeley and Great Dunmow and will consider the long term future for the route. This will include consideration of any ecological and environmental impacts and existing flood risk which may require mitigation through improved drainage. The location of the gas mains is a known constraint and mapped on UDC systems. Any improvement or development proposals along the Flitch Way will have to assess and consider the impact on the gas mains with consultation with the relevant utility provider.
ANON-QNH5-RDEP-7	Martin Crisp	On behalf of an Organisation	Essex Bridleways Association			
ANON-QNH5-RD1Q-M	clerk to Stebbing Parish Council	On behalf of an Organisation	Stebbing Parish Council	Improving connections	Stebbing Parish Council supports Core Policy 30 but would suggest that it could encourage increased active travel. New developments should connect to existing footpaths and Public Rights of Way. The policy could consider the use of byways with a Pilot / Trial on certain Byways to restrict to only Farm vehicles to allow for the promotion of Active Travel.	The Council welcomes the comments made by Stebbing Parish Council. The Council is satisfied that the proposed aims of Core Policy 28, when considered with the Area Strategies and other transport policies, constitutes a reasonable and appropriate approach to delivery of active travel. The Policy clearly states that active travel provision should ensure that existing pedestrian and cycling routes and Public Rights of Way are retained and enhanced as continuous linear features and that new links and routes should be provided. Core Policy 30 proposes a comprehensive approach to the consideration of Public Rights of Way in development proposals including the provision of new links to connect to the existing PROW network. Informal access issues are also considered in Core Policy 39: Green and Blue Infrastructure. Development proposals can promote Traffic Regulation Orders to prohibit certain types of users on Byways. This will be considered on a case by case basis through the planning system and through discussions with the highway authority. The Council does not consider that amending the policy to include reference to pilot or trial schemes is required.
ANON-QNH5-RD7U-X	Saffron Walden Town Council	On behalf of an Organisation	Saffron Walden Town Council	Informal unregistered routes	Saffron Walden Town Council state that the policy should include reference to informal unregistered routes.	The Council welcomes the comments made by Saffron Walden Town Council. The Council is satisfied that the proposed aims of Core Policy 30, when considered with the Area Strategies and other transport policies, constitutes a reasonable and appropriate approach to the protection and enhancement of public rights of way. The policy proposes a comprehensive approach to the consideration of public Rights of Way in development proposals including the delivery of new links. which could include formalising existing informal routes into development proposals where there is a clear benefit. It is difficult to define 'informal unregistered routes' and such a reference is not needed. Recreational access and connectivity, which could include existing informal routes, is also considered in Core Policy 39: Green and Blue Infrastructure. There is a formal statutory process

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
						for adding PROW to the Definitive Map to ensure that they become 'registered' and therefore protected under highway law. The Council will add the definition of PROW to the glossary.
ANON-QNH5-RDN8-R	Great Dunmow Town Council	On behalf of an Organisation	Great Dunmow Town Council	Support	Comments supporting Core Policy 30 were received from: - Great Dunmow Town Council, noting its accordance with Chapter 8 of NPPF and Policies: GA1: Core Footpath and Bridleway Network and GA2: Integrating Developments (Paths and Ways) of the Great Dunmow Neighbourhood Plan. - Portland Capita, broadly supporting the plan's transport policies.	The Council notes and welcomes the supportive comments.
ANON-QNH5-RDAX-B	Tom Vernon (Agent)	On behalf of an Organisation	Portland Capita			
ANON-QNH5-RDAU-8	Alex Cole	On behalf of an Organisation	Pigeon (Takeley) Ltd	Support with proposed changes	Pigeon recognises the importance of maintaining and enhancing Rights of Way. However, the policy is overly restrictive. Pigeon request that the policy should be reworded as follows: Development proposals for sites that include a Public Right of Way within the site or are for major development proposals adjacent to an existing Right of Way are required to should submit a Rights of Way Scheme that demonstrates how the development will protect, enhance and promote the Public Rights of Way network where this is appropriate and reasonable. This must should include, where necessary appropriate , improvements to help restore and re-connect Rights of Way. Where development would increase the pressure on the Rights of Way network, contributions will be sought through planning obligations* for measures to protect and enhance the Rights of Way network, including the delivery of additional routes and improvements to existing public paths both on-site and offsite where relevant planning and development considerations allow. *Any obligations sought must be in accordance with regulation 122 of the Community Infrastructure Levy Regulations 2010, or successor legislation.	The Council is satisfied that the proposed aims of Core Policy 30, when considered with the Area Strategies and other transport policies, constitutes a reasonable and appropriate approach to the protection and enhancement of public rights of way and no changes are required as proposed. The requirement of the submission of a PROW scheme together with any supporting details of the planning proposal will naturally consider the proportionality and appropriateness of all infrastructure requirements. It will take into account other relevant planning and development considerations, therefore, the suggested modification is not required.
ANON-QNH5-RDCT-9	Sophie Pain	On behalf of an Organisation	Pigeon			

Core Policy 31: Parking Standards

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RDCT-9	Sophie Pain	On behalf of an Organisation	Pigeon	Car Club schemes	In principle, Core policy 32 is supported by Pigeon but it is suggested the policy could go further to actively support schemes which provide reduced levels of car parking in their developments, where there are sustainable modes of travel and located near town centres. Pigeon question whether car club schemes should all be electric and whether it is feasible to require all major developments to deliver an electric car club scheme as this may be affected by grid capacity and the business models of car club providers. Pigeon proposes a modification to the effect that electric car club provision should be made where possible, and to state that reduced parking provision will be supported where there is good public transport and active travel links to town centres.	The Council welcomes the support of Pigeon and the comments are noted. Each major development proposal will be considered on a case by case basis with the scale of the car club scheme to be delivered considered and ensuring it is appropriate for the scale of development. The relevant key stakeholders will be consulted to ensure there is the grid capacity and understand if any upgrades to the existing network are required. In addition, the Council will continue to work with car club providers to ensure the delivery of these schemes. The Council does not support the proposed changes to the policy as it is appropriate that development proposals should provide robust evidence when they are proposing to deviate from policy or approved standards.
ANON-QNH5-RDAU-8	Alex Cole	On behalf of an Organisation	Pigeon (Takeley) Ltd			
ANON-QNH5-RDZ4-Z	Debden Parish Council	On behalf of an Organisation	Debden Parish Council	Car parking - Rural Areas	The Respondents are concerned with parking within the non-residential areas and towns across Uttlesford. Public transport is generally more limited within rural areas.	The Council has undertaken extensive transport evidence base to support the Local Plan. The Council appreciates that Uttlesford is a rural district and the aim of the Local Plan is to be realistic but ambitious in working towards achieving net zero and it's commitment to the climate emergency. The Local Plan proposes

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RDUP-Q	Loftus Buhagiar	Individual / member of the public				numerous upgrades and enhancement works to public transport links and active travel routes across Uttlesford to help the transition away from reliance on the private car. However, Core Policy 31 still supports the creation of parking spaces in line with the Uttlesford Design Guide to ensure that developments are accessible for all, including employment developments. There are no proposals in the Plan to reduce the number of car parking spaces. The car parking space requirement is deemed appropriate and is set out within the Uttlesford Design Guide and the Essex Parking Standards. Free parking spaces within Saffron Walden falls out with the Local Plan scope.
ANON-QNH5-RDNM-D	Graham Mott	On behalf of an Organisation	Elsenham Parish Council	Car parking standards	Elsenham Parish Council propose that reference to the appropriate paragraph in the Uttlesford design Code should be included in Core policy 31. It should be made clear that Uttlesford standards differ from Essex in that three parking spaces are stipulated for houses with four or more bedrooms. Uttlesford is predominantly rural and therefore high levels of car ownership are expected. The wording in Core policy 31 should be amended to include three parking spaces for three-bedroom house and at least four parking spaces for five bedroom or more houses.	The Council thanks Elsenham Parish Council for their response. The Council does not consider including reference to the appropriate paragraph/section in the Uttlesford Design Code is required. If the Uttlesford Design Code is revised, there is every eventuality that the para. ref. will be incorrect. Referencing the overarching code is sufficient. The parking standards set within the Uttlesford Design Guide have been based on the Essex Parking Standards which was produced in 2009. As the highways authority, Essex County Council will continue to be consulted as part of the planning application process. The Council do not consider is necessary to increase the minimum residential parking standards set within the Uttlesford Design Guide as this could result in car dominated development.
ANON-QNH5-RD1W-T	Zhanine Smith	On behalf of an Organisation	Essex County Council	Proposed amendments	Essex County Council wishes to note that a review of the Essex Parking Standards (Part 1) and Essex Garden Communities and Large-Scale Developments Parking Guidance (Part 2) have been subject to two consultations with LPAs and developers. These were approved by EPOA in September 2024, and then presented for formal adoption by ECC and each LPA thereafter. The Essex Parking Standards (2009) have been reviewed by EPOA as well. Once these standards have been approved it is expected that they will be a material consideration to which new development will need to have regard to at an early stage of the design process. ECC appreciates that parking is provided for cycles and scooters, parents using other ‘wheeled vehicles’ are not allowed to enter school sites. Active travel should be the main method of ‘drop-off’ and car parking for parents except for those with additional mobility needs. It is advised that due regard is given to the ECC Developers’ Guide to Infrastructure Contributions in particular pages 21-22 and Appendix D. Essex County Council recommend that paragraph 9.106 should be amended as below: “All cycle parking must be - <ul style="list-style-type: none"> •be secure and covered; •be conveniently located adjacent to entrances to buildings; •enjoy good natural observation; •be easily accessible from roads and/or cycle routes; •be well lit; and •be located so it does not obstruct pedestrian and cycle routes”. The third paragraph in Core Policy 31 should be amended as: “Educational developments, including new schools and expansions, should deliver secure parking for cycles, scooters and the like, for school pupils, staff, visitors and parents”.	The Council welcomes the comments made by Essex County Council and the suggested amendments. The Council is satisfied that the proposed aims of Core Policy 31 constitute a reasonable and appropriate approach to parking in the Local Plan. However, the Council will consider modifying the policy by adding in appropriate wording as suggested by the County Council.
ANON-QNH5-RD7U-X	Saffron Walden Town Council	On behalf of an Organisation	Saffron Walden Town Council	Proposed Amendments	Saffron Walden Town Council request that the Council adopt and enforce the ECC council parking standards. The policy should be strengthened by requiring “Development proposals must instead of should ”.	The Council notes the recommendations by the Town Council but considers that the policy wording is sufficiently robust and that no further modification is required.
ANON-QNH5-RDAX-B	Tom Vernon (Agent)	On behalf of an Organisation	Portland Capita	Support	Portland Capita broadly support the policies that relate to transport.	The Council welcomes the support of Portland Capita and the comments are noted.

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RDN8-R	Great Dunmow Town Council	On behalf of an Organisation	Great Dunmow Town Council	Transport evidence	Great Dunmow Town Council supports Core Policy 31. However, there is serious flaws in the evidence base and a reluctance on the part of the Council to admit that the use of car is generally the only option to travel. Core Policy 31 is based on idealism rather than reality and must be judged unsound as it fails the test of being justified and effective.	The Council welcomes the support of Great Dunmow Town Council and the comments are noted. The Council has undertaken extensive transport evidence base to support the Local Plan. The Council appreciates that Uttlesford is a rural district and the aim of the Local Plan is to be realistic but ambitious in working towards achieving net zero and its commitment to the climate emergency. The Local Plan proposes numerous upgrades and enhancements work to public transport links and active travel routes across Uttlesford to help the transition away from reliance on the private car. However, Core Policy 31 still supports the creation of parking spaces in line with the Uttlesford Design Guide to ensure that developments are accessible for all.
BHLF-QNH5-RDEH-Y	Essex County Fire and Rescue Service	On behalf of an Organisation	Essex County Fire and Rescue Service	Vehicle access	Essex County Fire and Rescue Service require vehicle access to be considered when deciding development density, especially where maximum parking numbers are considered.	Core Policy 31 requires development proposals to take into account the latest Parking Standards and the parking standards and Design principles set out in the Uttlesford Design Code. Expected Outcome M3.1 requires development proposals to demonstrate parking, access and servicing analysis before designing development. Development proposals as they are brought forward through the planning process will need to consider the latest principles in the Essex Highways Design Code in relation to parking, road widths and access of emergency vehicles and all other relevant highway design considerations. No modification to the policy is required.

Core Policy 32: The Movement and Management of Freight

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RDAU-8	Alex Cole	On behalf of an Organisation	Pigeon (Takeley) Ltd	Clarity and proposed amendments	Pigeon welcomes and encourages the support for local delivery hubs, but suggest the policy is overly restrictive in qualifying the exact circumstances under which the Council is prepared to support work to develop and enhance them. Greater flexibility is requested and support for delivery hubs that are not merely ‘local’ would be welcomed. It is noted that Core Policy 32 doesn’t state the type of proposals that require the submission of a Freight Management Strategy and where the freight strategies in Essex’s Local Transport Plan should be considered. Pigeon suggests that the policy lacks clarity on the relationship between criteria iii) and v) and the significant number or intensity of transport movements, and request that these criteria are removed from the policy, noting that they are already covered by other policies. It is also requested that the meaning of the term ‘intensity’ is unclear, and should be removed for clarity. Pigeon requests a series of modifications to the policy which seek to add conditionality to the policy and soften the requirement for proposals to demonstrate that the policy criteria i) to vi) have been met. Saffron Walden Town Council request that any proposals that generate ‘significant number or intensity of transport movements’ should be clearly defined. It is unclear whether this statement refers to transport movement arising from a completed development or from a building phase. It is also not clear if this will only be implemented for only major developments.	The Council is satisfied that the proposed aims of Core Policy 32, when considered with the other transport policies, constitutes a reasonable and appropriate approach to the Movement and Management of Freight, however it accepts that some modifications can be made to add clarity. The Policy states that a freight management strategy is required to be submitted for approval. However, the Council concur that it is not clear when the document should be submitted and will propose a modification which states that the freight management strategy should be submitted for approval at the planning application stage and the wording revised. It will also be clarified that this requirement relates to major applications. The policy relates to the operational phase of a development. Core Policy 27 includes requirements that relate to the construction phase, and the Council will propose a modification to that policy which sets out the requirement for Construction Management Plans. The Council does not accept that the other proposed modifications are required. It is appropriate that the Council requires development proposals with freight movements to consider impact on landscape, heritage, local character and biodiversity.
ANON-QNH5-RD7U-X	Saffron Walden Town Council	On behalf of an Organisation	Saffron Walden Town Council			
ANON-QNH5-RDUP-Q	Loftus Buhagiar	Individual / member of the public		Construction traffic	The Respondent questions how Core Policy 32 will deal with the construction phase for developments proposed in the Local Plan. No policy appears to address the high level of construction vehicles associated with new development.	The Council is satisfied that the proposed aims of Core Policy 32, when considered with the other transport policies, constitutes a reasonable and appropriate approach to the Movement and Management of Freight. Core Policy 32 applies to all development proposals in the District. Core Policy 27 relates to the measures and processes that development proposals are required to undertake in relation to assessing the impact of development proposals on transport infrastructure. This assessment will include the nature and number of

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
						HGV and Freight movements. The council will propose a modification to Core Policy 27 to include reference to Construction Management Plans.
ANON-QNH5-RDMM-C	Christine Griffin	On behalf of an Organisation	Newport Parish Council	Freight traffic - Saffron Walden	Newport Parish Council support the following paragraph in Core Policy 32: “Freight management strategies should ensure the use of the Strategic Road Network and minimise the use of the rural network and encourage the movement of freight by sustainable modes whilst minimising negative impact of freight trips on local communities.” However, are unable to find any other references or detail of proposals for North Uttlesford. Access to Saffron Walden is only via rural roads through local communities and, in the case of Newport, there is a height restriction. Newport Parish Council request that the Plan clarifies how additional freight traffic serving Saffron Walden will be routed and what, if any, improvements to the local and strategic road network are planned.	The Council welcomes the support of Newport Parish Council for Core Policy 32. The Council is satisfied that the proposed aims of Core Policy 32, when considered with the other transport policies, constitutes a reasonable and appropriate approach to the Movement and Management of Freight. Core Policy 32 applies to all development proposals in the District and it is not appropriate in this policy to list specific proposals or schemes in North Uttlesford. Such schemes or interventions are dealt with in the Area Strategies and supporting policies in the Plan. Core Policy 27 relates to the measures and processes that development proposals are required to undertake in relation to assessing the impact of development proposals on transport infrastructure. This assessment will include the nature and number of HGV and Freight movements.
ANON-QNH5-RDZN-T	Fiona Martin	On behalf of an Organisation	Natural England	Freight traffic - Takeley	Natural England notes the requirements of Core Policy 32 and their concerns about negative air pollution impacts from the employment allocation at Land North of Taylors Farm. They refer to comments provided against the site development template.	The Council acknowledges Natural England's concerns and is committed to continued close working as proposals for the site are developed. More detailed responses have been provided by the Council to Natural England's representations on this subject against Core Policies 4 and 10 and the site development templates.
ANON-QNH5-RD4S-S	Bill Critchley	Individual / member of the public		Local Delivery Hubs	The Respondent feels they are not qualified enough to comment on the legality of the Plan and notes issues with the formatting of the document. The respondent suggests the first paragraph of Core Policy 32 should reference a location when stating the Council will support the development and enhancement of local delivery hubs.	The Council thanks the Respondent for taking the time to respond to this consultation. Core Policy 32 is not supporting a specific local delivery hub but is more generally supporting the development of local delivery hubs across Uttlesford. Therefore, a specific location cannot be referenced.
ANON-QNH5-RDN8-R	Great Dunmow Town Council	On behalf of an Organisation	Great Dunmow Town Council	Support	Supportive comments were received from the following organisations: - Great Dunmow Town Council noting the policy's agreement with Chapter 8, Chapter 9, and Chapter 6 of NPPF. - Stansted Airport Limited, welcoming the recognition of Stansted Airport as an important national and regional hub for air freight and cargo. - Portland Capita expressing broad support for the plan's transport policies	The Council notes and welcomes the supportive comments.
ANON-QNH5-RD97-2	Lydia Sadler	On behalf of an Organisation	Stansted Airport Limited			
ANON-QNH5-RDAX-B	Tom Vernon (Agent)	On behalf of an Organisation	Portland Capita			

Core Policy 33: Managing Waste

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RD7U-X	Saffron Walden Town Council	On behalf of an Organisation	Saffron Walden Town Council	ECC waste strategy omission	Comment stating that a reference to Essex County Councils Waste Strategy is omitted from the policy.	Noted. Uttlesford adopted the Essex Waste Strategy in July 2024 and a reference to this in the supporting text would be useful to ensure clarity
BHLF-QNH5-RDEH-Y	Essex County Fire and Rescue Service	On behalf of an Organisation	Essex County Fire and Rescue Service	Fire Risk Management	Request from the Essex County Fire and Rescue Service mention of the management of the risk of fire in areas relating to waste management.	We note the request to mention fire risk in relation to the waste management policy. The policy relates partly to strategic waste management and partly to individual proposals. Whilst the policy does not explicitly refer to fire risk, the fire service will be consulted on individual development proposals at the application stage and will have the opportunity to comment on potential fire safety issues. This includes the ability to comment on the Site Waste Management Plan for large developments, which is a requirement of Core Policy 33. Strategic waste management policy is the responsibility of Essex County Council, therefore we would recommend that a similar representation is made for the Essex and Southend-on Sea Waste Plan Review.

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RD7U-X	Saffron Walden Town Council	On behalf of an Organisation	Saffron Walden Town Council	Policy Wording	Comment highlighting that the use of the word 'should' in the policy wording means the policy is optional and that the wording should be changed to include 'must'.	The council considers the policy as currently drafted is sufficiently effective whilst still allowing for an approach to the determination of planning applications which considers the overall planning balance. No modification is required.
ANON-QNH5-RDN8-R	Great Dunmow Town Council	On behalf of an Organisation	Great Dunmow Town Council	Support	Comments received from Great Dunmow Town Council and Stansted Airport Limited supporting the waste management requirements. The Town Council believes the policy is sound as it aligns with Chapter 17 of the NPPF and it will likely comply with the forthcoming ECC Waste Strategy. Stansted Airport Limited is supportive of the policy's reference to aviation impacts.	Support noted.
ANON-QNH5-RD97-2	Lydia Sadler	On behalf of an Organisation	Stansted Airport Limited			
ANON-QNH5-RDUP-Q	Loftus Buhagiar	Individual / member of the public		Waste Design Elements	Comment questioning why schemes to maximise recycling and reducing waste aren't shown in the plans.	This text refers to the waste hierarchy. In line with Core Policy 33 all proposals, including those for development of the strategic site allocations, must incorporate recycling facilities in order to maximise recycling and reduce waste. Waste management at a site-specific level will therefore be addressed at the planning application stage and available for public comment.
ANON-QNH5-RDN3-K	Edward Gildea	On behalf of an Organisation	Uttlesford Green Party	Waste Management Infrastructure	<p>Comment highlighting the lack of mention of waste management infrastructure in the policy. The comment highlights the following omissions from the policy:</p> <ul style="list-style-type: none"> - Production of biogas from organic waste - Encouragement of industry specialising in the recycling of car batteries - Management of the plastics recycling - Sustainable disposal of non-recyclable plastic waste with incineration and carbon capture to reduce pollution and generate energy - Income generation from the conversion of waste to useful products 	The council will still support sustainable waste management practices identified in the Essex Minerals Local Plan (2014) and the Essex and Southend-on-Sea Waste Local Plan (2017) or their replacements. As waste management infrastructure is the responsibility of Essex County Council it is not necessary for the topics mentioned to be included in the Uttlesford Local Plan. The policy ensures that any development proposals over 100 dwellings should submit a Site Waste Management Plan as part of their planning proposal and this will need to meet the requirements of the policy and any relevant ECC guidance. The policy also states that innovative solutions to minimise waste at the source will be supported.
ANON-QNH5-RDC4-9	margaret shaw	Individual / member of the public				

Core Policy 34: Water Supply and Protection of Water Resources

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RD7U-X	Saffron Walden Town Council	On behalf of an Organisation	Saffron Walden Town Council	Contamination Sanctions	Comment questioning what the sanctions are for when development causes contamination to groundwater sources and a request to change the wording of this paragraph from 'should demonstrate' to 'must demonstrate'	As per paragraph 59 of the NPPF enforcement action will be taken when breaches of planning permission or conditions have occurred. Since the enforcement actions are likely to vary according to the breach in question, it is not practical to set these out in the Local Plan. In regards of the wording of the policy the council believes that the wording of this part of the policy is sufficiently robust to ensure that contamination does not occur and that any necessary safeguards are included within proposals.
ANON-QNH5-RDZF-J	Anglian Water	On behalf of an Organisation	Anglian Water	Early Infrastructure Engagement.	<p>Anglian Water is supportive of the encouragement of early engagement with water companies and the fact the Council will apply the necessary phasing conditions to ensure that the necessary wastewater infrastructure can be delivered prior to the occupation of the development. The Environment Agency suggest that this is strengthened from encouragement to making early engagements, with suggested replacement wording as follows:</p> <ul style="list-style-type: none"> - Developers must contact service providers as early as possible to discuss their development proposals. 	Support noted. Core Policy 34 makes it clear that the Council expects sufficient water supply and treatment capacity to be in place when development is occupied, with phasing conditions applied where necessary, and developers are strongly encouraged to engage with the relevant water companies early in the planning process to identify any necessary water infrastructure requirements. In addition, by setting out strategic allocations and growth figures for smaller settlements, the Local Plan provides clarity to the service providers on the location of growth within the District over the plan period, allowing them to plan for infrastructure upgrades.
ANON-QNH5-RD19-V	Giles Ward	On behalf of an Organisation	Environment Agency			
ANON-QNH5-RD19-V	Giles Ward	On behalf of an Organisation	Environment Agency	Efficiency Measures	The Environment Agency notes that the policy outlines requirements for developments to include water efficiency measures and water recycling schemes.	Noted
ANON-QNH5-RD19-V	Giles Ward	On behalf of an Organisation	Environment Agency	Efficiency standards -	The Environment Agency recommends that for non-residential development the water efficiency standard should be strengthened to target the BREEAM "Outstanding" level. This would require 85%	The Council acknowledges the recommendations set out by the Environment Agency but consider that any stricter requirement would need to be accompanied by appropriate evidence. In this case, the policy approach is informed by the Water Cycle Study which recommends that non-household development should achieve a

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
				non-residential	completion rather than the 60% completion that the current policy equates to.	minimum of 3 credits in the assessment category WAT01, and this has been adopted on consideration of the balance between achieving water efficiency and the need for new employment development to remain viable.
ANON-QNH5-RDAU-8	Alex Cole	On behalf of an Organisation	Pigeon (Takeley) Ltd	Flexibility	Comment requesting additional wording at the top of the policy as follows: "Where relevant planning and development considerations allow, proposals are expected to meet the following criteria where reasonable."	In all planning applications the policy will need to be considered alongside other policy requirements and material considerations, and the Council does not consider that the proposed modification would add to the policy.
ANON-QNH5-RDUP-Q	Loftus Buhagiar	Individual / member of the public		General - Capacity Concerns	Comments questioning how existing drainage systems and water tables can cope with new development. Another comment also highlights that water shortages in this part of the country have not been adequately addressed.	The development proposed in the Local Plan has been modelled through a Water Cycle Study and tested with water and wastewater undertakers to determine whether the existing water supply and wastewater infrastructure can accommodate the development over the plan period. Without a Local Plan, development has been considered on an ad-hoc basis which doesn't give certainty to the water companies so they can plan for future water infrastructure. Core Policy 34 states that permission will only be granted where there is sufficient capacity to serve the development prior to occupation.
ANON-QNH5-RD1N-H	Barbara Light	Individual / member of the public				
ANON-QNH5-RDUP-Q	Loftus Buhagiar	Individual / member of the public				
ANON-QNH5-RDYU-Z	Louise Pepper	Individual / member of the public		Great Dunmow - Waste Water Capacity Concerns	<p>Comment pointing out that a capacity assessment was performed on the 18 WwTW in Uttlesford and of these, 4 are already close to their permanent limit based on the 80th exceedance percentile. They point out that Great Dunmow WwTW is currently being upgraded to ensure future compliance and argue that growth in Great Dunmow should be planned for the later stages of the local plan to enable investment by Anglian Water in the Great Dunmow WwTW.</p> <p>They argue that because of this there should be a lower quantum of housing in Great Dunmow to alleviate these concerns.</p>	The Council notes the capacity concerns regarding the sites in Great Dunmow but is content that the policy will ensure that sufficient foul water drainage capacity can be demonstrated and that the capacity will be provided in time to serve new development prior to first occupation. This will be tested during the detailed planning stage and developers are encouraged to engage with wastewater undertakers early to identify any capacity constraints. Development on the strategic allocations at Great Dunmow is expected to come forward in the second half of the plan period, allowing for any necessary upgrade works to be completed.
ANON-QNH5-RDYU-Z	Louise Pepper	Individual / member of the public		Great Dunmow - Water Quality Concerns	<p>Comment indicating that the WFD's mapping shows that there are no waterways within the district in 'good' ecological status. They also point out that Water Quality A sensitivity analysis for Great Dunmow indicates that there is a high sensitivity observed for the River Chelmer as it passes Great Dunmow.</p> <p>They argue that because of this there should be a lower quantum of housing in Great Dunmow to alleviate these concerns.</p>	The sensitivity concerns around Great Dunmow are noted. We aim to protect these watercourses with core policy 35 which provides a buffer zone around these vital habitats, ensuring their long-term health. The Water Cycle Study tested the proposed allocations and found that there would not be an unacceptable deterioration in water quality as a result of the planned growth.
ANON-QNH5-RD19-V	Giles Ward	On behalf of an Organisation	Environment Agency	Groundwater as a resource.	The Environment Agency notes that the policy also emphasizes the protection of groundwater and surface water resources, especially in sensitive areas.	Noted
ANON-QNH5-RD1S-P	Andrew Martin	On behalf of an Organisation	S. Robinson Farms Ltd	Impact of Water Supply on Existing Developments	Comment from a landowner expressing concern that their existing property in Great Dunmow, will be adversely affected by the allocated site in North East Great Dunmow. They request that Core Policy 34 be modified by the additional sentence under the heading - Water Supply:	The Council does not consider that the suggested addition to the policy is required since Core Policy 34 already sets out that sufficient water supply capacity should be in place when developments are occupied. This will require either a demonstration that sufficient capacity already exists or a phased approach to development which allows for any necessary upgrades to be carried out prior to occupation.
ANON-QNH5-RD1S-P	Andrew Martin	On behalf of an Organisation	S. Robinson Farms Ltd		<p>"New development must not adversely affect in any way the existing supply or source of water to existing developments. Applicants for planning permission must clearly set out their proposals for the supply of potable water and demonstrate that there will be no adverse impact on existing supplies to neighbouring properties."</p> <p>Additional comments have highlighted general concerns about water supply to neighbouring properties.</p>	

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RD1S-P	Andrew Martin	On behalf of an Organisation	S. Robinson Farms Ltd	Impact of Water Supply on Existing Developments	<p>Comment from a landowner expressing concern that their existing property in Great Dunmow, will be adversely effected by the allocated site in North East Great Dunmow. They request that Core Policy 34 be modified by the additional sentence under the heading - Water Supply:</p> <p>"New development must not adversely affect in any way the existing supply or source of water to existing developments. Applicants for planning permission must clearly set out their proposals for the supply of potable water and demonstrate that there will be no adverse impact on existing supplies to neighbouring properties."</p> <p>Additional comments have highlighted general concerns about water supply to neighbouring properties.</p>	The Council does not consider that the suggested addition to the policy is required since Core Policy 34 already sets out that sufficient water supply capacity should be in place when developments are occupied. This will require either a demonstration that sufficient capacity already exists or a phased approach to development which allows for any necessary upgrades to be carried out prior to occupation.
ANON-QNH5-RD7U-X	Saffron Walden Town Council	On behalf of an Organisation	Saffron Walden Town Council	Industrial Development	Comment requesting clarification that the policy also applies to industrial development as well as residential	Although it is unclear which part of the policy requirements the comment is referring to, Core Policy includes general requirements for "development proposals" or "new development", rather than distinguishing between different types of development, and it should be viewed as applying equally to residential and non-residential development, with no additional clarification required. The exception to this is the water efficiency standards, which are different for residential and non-residential development since the standards set out in Building Regulations apply solely to residential development. In this case, the policy provides a clear distinction between the two standards and the types of development it applies to.
ANON-QNH5-RDZF-J	Anglian Water	On behalf of an Organisation	Anglian Water	Infrastructure	Anglian Water is supportive of the infrastructure section of Core Policy 34 but questions whether the mains foul drainage connection would be more appropriate in Core Policy 35.	Support noted. The Council is content that the foul water drainage requirement remains within this policy with an appropriate cross-reference from Core Policy 35.
ANON-QNH5-RD1W-T	Zhanine Smith	On behalf of an Organisation	Essex County Council	Infrastructure - Additional Wording	<p>Comment requesting that in the Infrastructure section, additional wording in the policy should ensure that fouds drainage follows the Lead Local Flood Authorities Guidance (ECC).</p> <p>Additional wording - "The Council will expect new development to connect to mains foul drainage and will restrict the use of non-mains drainage for foul water disposal, in line with Environment Agency and Lead Local Flood Authority guidance. The location of, and likely impact"</p>	Noted. The Council agrees with the suggested modification and will add a reference to the Lead Local Flood Authority Guidance as suggested to provide additional clarity.
ANON-QNH5-RD7U-X	Saffron Walden Town Council	On behalf of an Organisation	Saffron Walden Town Council	Infrastructure - Individual Treatment Works	Comment requesting that the findings in the water cycle study should be referenced in the policy to ensure that the water treatment works in Saffron Walden can cope with additional growth	The infrastructure implications of the Local Plan growth is set out in the Water Cycle Study and should inform development proposals for the strategic allocations. This has been tested with infrastructure providers to ensure that any necessary upgrades can be identified. the site development templates (appendix 2-4) include a requirement for developers to liaise with utilities providers to ensure that appropriate infrastructure is provided alongside their development. The council is satisfied that this information is sufficient to ensure that the necessary upgrade works to deliver the development at Saffron Walden are carried out.
BHLF-QNH5-RDEH-Y	Essex County Fire and Rescue Service	On behalf of an Organisation	Essex County Fire and Rescue Service	Land Management Strategy	Essex County Fire and Rescue Service have suggested that a land management strategy is implemented to minimise the spread of fire to/from development sites.	The Local Plan does not set out specific requirements with regard to fire safety. However, Core Policy 39 does require all major development proposals to be accompanied by a Green and Blue Infrastructure Plan which includes details of management and maintenance arrangements. The fire safety of individual developments and the appropriate management of landscaped areas will be tested through the development management process, and the Fire Service will be consulted on all applications.
ANON-QNH5-RDMM-C	Christine Griffin	On behalf of an Organisation	Newport Parish Council	Mandating rainwater and greywater recycling	Comments recommending paragraph 9.124 is strengthened from encouragement of rain water harvesting and grey water recycling to mandating this. Requests to modify the policy so stronger wording is used in the water recycling paragraph. A comment also states that not including grey water recycling could hinder the effectiveness of the plan.	The Local Plan does not mandate that development proposals use rain water harvesting and grey water recycling as it might not be practical based on specific contexts of each site. This approach has been informed by responses from water undertakers to the Regulation 18 Local Plan which highlight that grey water recycling may not always be the most appropriate means of achieving water efficiency, particularly on small sites. However, Core Policy 34 does require that development proposals make appropriate provision for water recycling where possible, therefore at each planning application the steps that the developer has taken to recycle water will be considered.
ANON-QNH5-RD19-V	Giles Ward	On behalf of an Organisation	Environment Agency			

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RD7K-M	David Poole	On behalf of an Organisation	Weston Homes	Offsite water infrastructure - Responsibilities	Comment arguing that local plans should not require developers to assess water supply and wastewater services. Instead, water companies, in collaboration with local authorities and the Environment Agency, are responsible for planning for future water demand. The comment argues that if water companies cannot guarantee water supply the development proposed in the Local Plan is unsound and cannot be delivered. They state that developers can't resolve water service issues and that water companies, local authorities and the Environment Agency should be fulfilling their statutory obligations. They request that therefore the final paragraph in the policy should be removed as they are not legally sound.	The policy does not require developers to assess capacity in itself. It requires a demonstration that there is sufficient capacity to serve the proposed development. This is likely to require engagement between the applicant and water/wastewater undertakers, and the Council encourages developers to make use of the water companies' pre-application advice service wherever possible. This is particularly important for non-residential development where water companies do not have a statutory duty to provide services, but it should also be carried out for residential development so that any upgrade requirements can be identified early. As set out in the policy and paragraph 9.128, conditions may be required which are linked to the phasing and occupation of the development.
ANON-QNH5-RDDJ-Z	Mark Behrendt	On behalf of an Organisation	Home Builders Federation			
ANON-QNH5-RD19-V	Giles Ward	On behalf of an Organisation	Environment Agency	Off-site water infrastructure - Support	The Environment Agency expresses support for the requirement for off-site water infrastructure to be in place prior to occupation and that phasing conditions where appropriate will be applied.	Support Noted.
ANON-QNH5-RDN3-K	Edward Gildea	On behalf of an Organisation	Uttlesford Green Party	Sewage Infrastructure Omission	Comment arguing that sewage infrastructure is omitted from the plan and that it is critical for development in places such as Wendens Ambo.	Sewage infrastructure is not omitted from the plan. As noted in paragraph 9.127, the Local Plan is supported by a Water Cycle Study which includes detailed modelling of wastewater catchments to ensure that there is sufficient capacity to support the development proposed in the plan. The Water Cycle Study was developed through engagement with the relevant water undertakers who were given the opportunity to identify capacity constraints within their networks. The Infrastructure Delivery Plan also contains details of the required upgrades across the District, again informed by consultation with the wastewater undertakers. As set out in Core Policy 34, all planning proposals which increase the demand for off-site water and sewage infrastructure are required to demonstrate that the infrastructure is in place prior to first occupation, and the Local Plan encourages applicants to use the pre-application services offered by water undertakers so that any upgrade requirements or capacity constraints can be identified early in the planning process.
ANON-QNH5-RDZF-J	Anglian Water	On behalf of an Organisation	Anglian Water	Support - Water Conservation measures	Comment that supports water conservation measures like rainwater harvesting and greywater recycling. The comment advocates for integrated water management, including water reuse technologies for domestic uses like toilet flushing and garden irrigation. They argue that this approach can significantly reduce water consumption and surface water runoff through SuDS attenuation.	Support noted.
ANON-QNH5-RDZF-J	Anglian Water	On behalf of an Organisation	Anglian Water	Supporting text - Drainage and Wastewater Management Plans.	Anglian Water requests an amendment to paragraph 9.127 so that it has regard for Drainage and Wastewater Management Plans and water companies' business plans which set out how and when investments in infrastructure are planned.	Noted, the Council considers that the Drainage and Wastewater Management Plans have been appropriately considered through the Water Cycle Study, referred to in paragraph 9.127, and that a specific mention in the supporting text is not required. However, paragraph 9.128 encourages applicants to engage with water undertakers early in the planning process so that any capacity issues and infrastructure upgrade requirements are identified as early as possible. Where speculative development is proposed in locations without access to wastewater treatment infrastructure and which do not align with the DWMP, this can be addressed through the application of planning conditions or, where necessary, through the refusal of planning permission.
ANON-QNH5-RD1W-T	Zhanine Smith	On behalf of an Organisation	Essex County Council	Water Efficiency - Higher Standards	The current water efficiency policy in Essex is insufficient to address the region's serious water stress. The comment proposes changes that aim to strengthen the policy by mandating a stricter water efficiency standard of 80 litres per person per day for new homes and requiring full BREEAM WAT 01 credits for non-residential development. These adjustments are based on recent national reports and the Water Strategy for Essex, aiming to ensure future development is more water-efficient and resilient.	Whilst the Council notes ECC's position and the Water Strategy for Essex, and would support any development which goes beyond the standards set out in Core Policy 34, the policy is informed by the recommendations of the Water Cycle Study. This identifies 90l/p/d as an appropriate target for residential development and 3 BREEAM Wat01 credits for non-residential development during the plan period. These standards have also been tested through the viability assessment, and a tighter standard may have implications for the viability of development which have not been assessed for the Local Plan.
ANON-QNH5-RDZN-T	Fiona Martin	On behalf of an Organisation	Natural England	Water Efficiency - Support	Comments expressing support for the standards set out for all new residential development to achieve at least a water efficiency standard of 90 litres per person per day and for non-residential development proposals at least 3 credits under the BREEAM "Wat01" measure.	Support noted. The Council is committed to ensuring high standards for water efficiency in new developments.

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
				(Natural England)		
ANON-QNH5-RD7K-M	David Poole	On behalf of an Organisation	Weston Homes	Water Efficiency - Unjustified Consumption Standards	Multiple Comments highlighting the unjustified water efficiency standard of 90l/p/d. They note that the Local Plan should not be going beyond the national standard set out in paragraph 56-110 of the PPG which sets out a 110l/p/d standard. They also highlight that paragraph 159b of the NPPF stating that " any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards." They acknowledge the importance of the principle of these efficiency but don't believe the burden of this issue should fall on housebuilders. A comment from the Environment Agency also highlights that the evidence from the Stage 2 WCS recommends a 100l/p/d target up until 2030 and 90l/p/d thereafter, so the policy should be clearer in this regard.	The efficiency standard aligns with the Catchment Based Approach set out in the Chalk Stream Strategy, and is broadly supported by the water companies as it will reduce pressure on drinking water resources and wastewater treatment infrastructure. The council believes that the high efficiency target is sufficiently justified, on the basis of the serious water stress across the Affinity Water Supply region and the recommendations of the Water Cycle Study.
ANON-QNH5-RDWU-X	Tara Lewis	On behalf of an Organisation	DLP Planning Ltd on behalf of Salacia Ltd			
ANON-QNH5-RD19-V	Giles Ward	On behalf of an Organisation	Environment Agency			
ANON-QNH5-RDDJ-Z	Mark Behrendt	On behalf of an Organisation	Home Builders Federation			
ANON-QNH5-RDRS-Q	Richard Agnew	On behalf of an Organisation	Gladman Developments Ltd			
ANON-QNH5-RD3H-D	Kim Rickards	On behalf of an Organisation	Durkan Estates Ltd			
ANON-QNH5-RDZF-J	Anglian Water	On behalf of an Organisation	Anglian Water	Water Recycling - Robust Approach	Anglian Water requests an amendment to the policy for where the reference to a rainwater butt as an adequate rainwater collection and recycling measure should be removed. They ask that the policy should have a more robust approach on water recycling/reuse ambitions by referring to community scale measures such as rainwater harvesting and greywater recycling systems.	The Council considers that the reference to rainwater butts as an example of a small-scale rainwater collection and reuse method remains appropriate particularly at the individual dwelling level, and its inclusion is supported by Natural England. The supporting text (para 9.129) also refers to more robust measures such as rainwater harvesting and greywater recycling which may be more appropriate for larger schemes. No modification is required.
ANON-QNH5-RDZN-T	Fiona Martin	On behalf of an Organisation	Natural England	Water Recycling - Support	Natural England expresses support for the requirements in the water recycling section of the Core Policy 34, but requests that these requirements are linked to Core Policy 37: Sustainable Drainage Systems	Support noted
ANON-QNH5-RDMM-C	Christine Griffin	On behalf of an Organisation	Newport Parish Council	Water Resources - Support	A number of comments were received expressing support for the policy and its compliance with the NPPF. This included comments from the following Parish and Town Councils: - Newport Parish Council - Great Dunmow Town Council - Ickleton Parish Council - Littlebury Parish Council	Support noted.
ANON-QNH5-RDN8-R	Great Dunmow Town Council	On behalf of an Organisation	Great Dunmow Town Council			
ANON-QNH5-RDZ2-X	Terry Sadler	On behalf of an Organisation	Ickleton Parish Council			
ANON-QNH5-RD9A-C	Nick Dukes	On behalf of an Organisation	Littlebury Residents Group			
ANON-QNH5-RDRT-R	Tracy Coston	On behalf of an Organisation	Littlebury Parish Council			
ANON-QNH5-RDZF-J	Anglian Water	On behalf of an Organisation	Anglian Water	Water Resources - Support	Comments expressing support for the policy and its compliance with the NPPF. Anglian also note that they are continuing to work with the Environment Agency, Natural England and Cambridge Water on a joint protocol for Water Efficiency which aims to improve building regulation	Support noted. The Council is content that the Regulation 19 evidence base supports an efficiency target of 90l/p/d, but is supportive of the work on the joint protocol and will consider whether more ambitious targets should be adopted in future iterations of the Local Plan where evidence suggest that this would be beneficial.

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
				(Anglian Water)	water efficiency to a minimum of 100 l/p/d in water-stressed areas, and encourages local planning authorities to adopt an even more ambitious target of 80 l/p/d. This will be supported by an evidence base that will be regularly updated.	
ANON-QNH5-RDNN-E	Stephen Kelly	On behalf of an Organisation	Greater Cambridge Shared Planning (on behalf of Cambridge City Council and South Cambridgeshire District Council)	Water Resources - Support (Greater Cambridge)	Supportive comment from Greater Cambridge Shared Planning which recognises the water stress in the district and wider area and the impact this water stress is having on chalk streams. They note that the headwaters of the River Granta and Cam run through Uttlesford and therefore impacts from water abstraction and pollution will impact Greater Cambridge water flow and quality downstream. They note the regional importance of water resource management and that the two councils have worked together with Uttlesford District Council to ensure that both councils have strong integrated water management policies.	Support noted, Uttlesford is committed to preserving regional water resources and will continue to work closely with both Greater Cambridge councils to achieve this.
ANON-QNH5-RD19-V	Giles Ward	On behalf of an Organisation	Environment Agency	Water supply - Assessment	Comment questioning how the requirement for developments to demonstrate adequate water capacity before occupancy, will be assessed. Therefore they state it is difficult to justify this.	Applicants are encouraged to engage early with water and wastewater undertakers, using their pre-application services to determine whether sufficient capacity exists. The water undertakers are also statutory consultees in the development management process and will, where necessary identify the need for phasing conditions to ensure that sufficient capacity is in place before developments are occupied.
ANON-QNH5-RD19-V	Giles Ward	On behalf of an Organisation	Environment Agency	Water Supply - Rainwater Re-use and collection	The comment states that the policy mandates water efficiency measures in developments, but could be strengthened by encouraging rainwater reuse and collection, including mandatory water butts and more favourable treatment of formal rainwater harvesting systems.	Noted, the policy does already include a requirement for rainwater re-use and recycling to be included within development proposals, but the Council recognises that this may not always be practical and that in some cases it could affect the viability of development. A stricter requirement has not been tested through the viability assessment, and whilst the Council encourages best-practice and will support proposals which go beyond the policy requirements it is not considered that the policy needs to be strengthened.
ANON-QNH5-RD19-V	Giles Ward	On behalf of an Organisation	Environment Agency	WFD - Monitoring	Comment supporting the requirement for developments to positively impact water quality and flow through achieving 'good' status under the Water Framework Directive. However, it argues that the plan lacks clarity on how to assess and monitor these effects for specific developments.	There is no formal guidance on assessment for most types of development relating to the Water Framework Directive. However, the Environment Agency has produced guidance related to nationally significant infrastructure projects which may provide a helpful starting point for developers when approaching the assessment for their proposals. The Council will consider whether an additional modification with reference to this guidance would be beneficial.
ANON-QNH5-RD19-V	Giles Ward	On behalf of an Organisation	Environment Agency	WFD - Policy Location	Suggestion that the Water Framework Directive aims are included within the Infrastructure Paragraph as well as the Water Supply Paragraph. They argue that sufficient foul water infrastructure is necessary to reduce pollution to the water environment.	Noted. The Council agrees that additional wording in the Infrastructure Paragraph would be provide helpful clarification.

Core Policy 35: Watercourse Streams Protection and Enhancement

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RDZN-T	Fiona Martin	On behalf of an Organisation	Natural England	Chalk Stream impact study.	Natural England requests that proposals that may impact chalk streams should be required to submit a Chalk Stream Impact Study to ensure that the chalk stream water supply and quality are not compromised by the development proposal.	Noted. The Council considers that the policies in the Local Plan are sufficient to provide protection for chalk streams and the suggested requirement may not be effective in the absence of a statutory chalk stream designation. With regard to water quality and habitat, Core Policy 35 requires buffer zones for all watercourses along with an assessment of the potential impact of the proposed development on groundwater and watercourses, whilst Core Policy 38 requires proposals to be accompanied by an ecological survey if it does or has the potential to affect a site of biodiversity interest, with specific reference made to priority habitats such as chalk streams. Water capacity is addressed through Core Policy 34, which states that development must not lead to reduced flows in any watercourses, including chalk streams.
ANON-QNH5-RDZF-J	Anglian Water	On behalf of an Organisation	Anglian Water	CP34 Cross Reference	Anglian Water supports the government's focus on water quality and biodiversity. They are committed to improving water quality through their WINEP program, which includes nutrient removal and storm overflow	Support noted.

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
					improvements. This will benefit the environment in both the short and long term. They also support the policy cross-reference to Core Policy 34, which ensures adequate sewage network capacity for new developments.	
ANON-QNH5-RDZN-T	Fiona Martin	On behalf of an Organisation	Natural England	General - Support	A number of comments were received, including from Natural England, highlighting support for Core Policy 35, particularly with respect to the protection of chalk streams and the river catchment-based approach is to be taken. Support is expressed for the incorporation of the water efficiency and buffer zone recommendations of the Chalk Stream Study in the Local Plan policies.	Support noted.
ANON-QNH5-RDZ2-X	Terry Sadler	On behalf of an Organisation	Ickleton Parish Council			
ANON-QNH5-RDZN-T	Fiona Martin	On behalf of an Organisation	Natural England			
ANON-QNH5-RD1U-R	Harriet Burrow	On behalf of an Organisation	Ashdon Neighbourhood Plan Steering Group			
ANON-QNH5-RD1S-P	Andrew Martin	On behalf of an Organisation	S. Robinson Farms Ltd			
ANON-QNH5-RD1U-R	Harriet Burrow	On behalf of an Organisation	Ashdon Neighbourhood Plan Steering Group	Maximum capacity - Ashdon sewage works.	Comment requesting that the near maximum capacity of Ashdon sewage treatment will be addressed.	It is noted that Ashdon is designated as a smaller village, therefore only limited infill development will be permitted. The impact this development will have on the water supply will be considered in each individual planning application.
ANON-QNH5-RDUP-Q	Loftus Buhagiar	Individual / member of the public		Policy Enforcement	Comment questioning how UDC will enforce the protection and enhancement of river corridors as they are important assets for biodiversity and protection.	The primary vehicle for delivering the objectives of Core Policy 35 is the development management system, where applications will be tested against the policy requirements. Where necessary, conditions will be attached to planning permissions and any breaches of the planning permission will be considered through the planning enforcement process.
ANON-QNH5-RDAU-8	Alex Cole	On behalf of an Organisation	Pigeon (Takeley) Ltd	Policy flexibility - Infrastructure	<p>Comment requesting that the wording of the final paragraph in the policy be amended as listed below:</p> <ul style="list-style-type: none"> - Replace: planning approval will be contingent on with Proposals should seek, where relevant, to provide - Replace: being in place with to meet their own needs - Remove: additional - Remove: in accordance with Core Policy 34: Water Supply and Protection of Water Resources - Replace: To achieve this, developers are expected, to contribute proportionate costs and mitigation of addressing any potential impacts with To achieve this, developers are expected where relevant, and subject to viability, to contribute proportionate costs and mitigation of addressing any potential impacts <p>They argue that these amendments are necessary to provide greater clarity and flexibility to ensure that the requirement remains proportionate and appropriate for each development.</p>	The proposed amendments seek to reduce the requirements for development proposals to contribute to mitigation, and to allow development to come forward in the absence of sufficient infrastructure. This would be contrary to the objectives of the plan and the Council does not consider that the proposed modification is justified.
ANON-QNH5-RD7K-M	David Poole	On behalf of an Organisation	Weston Homes	Removal - Developer contributions	Comment requesting to remove the part of the policy that requires developers to contribute proportionate costs and mitigation of addressing any potential impacts on chalk aquifer abstraction or	Core Policy 34 sets out the Council's expectation that sufficient water supply capacity must be in place prior to the occupation of any new development. Developers should engage early with water supply undertakers to determine whether there are any capacity issues which may require upgrades to be completed before

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
					ecology. They argue that this is a strategic local plan issue and that UDC should be collaborating with water companies and adjacent strategic policy makers to plan for the level of growth in the plan period.	developments are occupied. If proposals are likely to result in harm to the ecology of chalk streams or any other watercourses, or have the potential to result in depletion of chalk aquifers, then the Council considers it appropriate that the proposed development should either provide appropriate mitigation or make a proportionate contribution to mitigation measures.
ANON-QNH5-RD1U-R	Harriet Burrow	On behalf of an Organisation	Ashdon Neighbourhood Plan Steering Group	River Bourne Designation	Comment highlighting satisfaction that the River Bourne is shown on maps and its chalk stream origins are acknowledged but they also express dissatisfaction that Natural England designate the stream as a 'partial chalk stream'.	Noted. River Bourne has been identified as a partial chalk stream by the Water Cycle Study Stage 2 (refer to paragraph 4.1.4) due to its unique geology but is not included in the Natural England mapping of chalk streams.
ANON-QNH5-RD7U-X	Saffron Walden Town Council	On behalf of an Organisation	Saffron Walden Town Council	Roads between settlements	Comment requesting that the supporting text for the Core Policy consider the roads between settlements, they specifically cite the B1383 between Saffron Walden and Newport.	Paragraph 9.139 already refers to roads in terms of flood risk and the SFRA also includes additional mapping which clearly shows areas of flood risk and additional information on historic flood events. The Council does not consider a modification to include reference to a specific road is necessary in addition to the flood mapping in the SFRA.
ANON-QNH5-RDN8-R	Great Dunmow Town Council	On behalf of an Organisation	Great Dunmow Town Council	Watercourse protection - Support	A number of comments were received expressing general support for the policy, including from Newport Parish Council and Great Dunmow Town Council which highlighted its conformity with Chapter 14 of the NPPF and Policy LSC2 of the Great Dunmow Neighbourhood Plan.	Support noted.
ANON-QNH5-RDMM-C	Christine Griffin	On behalf of an Organisation	Newport Parish Council			
ANON-QNH5-RDN3-K	Edward Gildea	On behalf of an Organisation	Uttlesford Green Party			
ANON-QNH5-RDNN-E	Stephen Kelly	On behalf of an Organisation	Greater Cambridge Shared Planning (on behalf of Cambridge City Council and South Cambridgeshire District Council)	Watercourse protection - Support (Greater Cambridge)	Supportive comment from Greater Cambridge Shared Planning which recognises the water stress in the district and wider area and the impact this water stress is having on chalk streams. They note that the headwaters of the River Granta and Cam run through Uttlesford and therefore impacts from water abstraction and pollution will affect Greater Cambridge water flow and quality downstream. They note the regional importance of water resource management and that the two councils have worked together with Uttlesford District Council to ensure that both councils have strong integrated water management policies.	Support noted. The Council is committed to preserving regional water resources and protecting chalk streams and will continue to work closely with both Greater Cambridge councils to achieve this.

Core Policy 36: Flood Risk

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RD1W-T	Zhanine Smith	On behalf of an Organisation	Essex County Council	Additional SuDS requirements	<p>Comment requesting that within paragraph 9.143, Core Policy 36 should be amended to include two additional paragraphs</p> <p>“vi. Use sustainable drainage systems (SuDS) for the management of surface water and where possible increase biodiversity and amenity”</p> <p>“Proposals must include a Drainage Strategy to evidence how the development will mitigate flooding on and off site. This must have regard to the Sustainable Drainage Systems Design Guide for Essex.”</p>	The amendment appears to raise the bar by requiring both major and minor development to include SuDS and a drainage strategy which does not accord with the flood risk assessment PPG.

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RD1X-U	Rachael Donovan	On behalf of an Organisation	NHS Hertfordshire and West Essex	Ambulance Stations Locations.	Comment noting that ambulance stations cannot be located in flood zones 2 and 3	Noted. The policy aims to protect all development from flood risk through the application of the Sequential Test. National policy sets out the types of development which are considered more vulnerable and which should not be located in Flood Zones 2 and 3, including ambulance stations.
ANON-QNH5-RDZF-J	Anglian Water	On behalf of an Organisation	Anglian Water	Cross reference to other policies	Anglian Water and Natural England suggest that Core Policy 36 should include cross-references to other policies in Chapter 9, as follows: - clause i should refer to Core Policy 37 due to the importance of SuDS in minimising surface water risk for all development. - clause ii should refer to Core Policy 34 or the clause should be modified to state "provide a surface water and foul drainage strategy" - the Policy should refer to Core Policy 39 due to the role that Green and Blue Infrastructure can play in flood alleviation	The Council considers that the existing cross reference to Core Policy 37 in paragraph 9.144 of the supporting text is sufficient to clarify the importance of SuDs in the context of flood risk. It is considered that the inclusion of references to Core Policies 34 and 37 in paragraph 9.144 would also strengthen the link between Core Policy 36 and those policies. An additional modification is proposed to this effect. Further to this additional modification, amendments are also proposed to Core Policy 39 and Core Policy 37 which highlight the links between the policies in this chapter of the Plan.
ANON-QNH5-RDZN-T	Fiona Martin	On behalf of an Organisation	Natural England			
ANON-QNH5-RD19-V	Giles Ward	On behalf of an Organisation	Environment Agency	Detailed Modelling - Flood Extent	Comment requesting the wording of this policy be amended so that where detailed modelling of a watercourse not be available the site specific flood risk assessment should estimate the 1 in 30, 1 in 100 and 1 in 1000 flood extents and flood levels	Noted. The Council agrees with this recommendation to ensure the plan is in accordance with the NPPF and the recommendations in the stage 2 Strategic Flood Risk Assessment (stage 2).
ANON-QNH5-RD19-V	Giles Ward	On behalf of an Organisation	Environment Agency	Flood Extent in the context of floodplain compensation	Comment from the Environment Agency requesting that in accordance with their regulation 18 response, the policy should refer to 1 in 100 flood extent rather than flood level in the context of requiring floodplain compensation.	Noted. This amendment is considered necessary by the council to add additional clarity.
ANON-QNH5-RDN8-R	Great Dunmow Town Council	On behalf of an Organisation	Great Dunmow Town Council	Flood Risk - Support	Supportive comment on the principle of the policy, stating that it is compliant with Chapter 14 of the NPPF and therefore sound, but suggesting that Great Dunmow site allocations do not accord with the policy.	Support for the policy is noted. All strategic allocations in the Local Plan have been assessed through the Level 2 SFRA using detailed modelling agreed with the Environment Agency. The site development templates have been developed in accordance with the mitigation recommended in the SFRA, including consideration of the location of development away from areas at risk of flooding.
ANON-QNH5-RD1S-P	Andrew Martin	On behalf of an Organisation	S. Robinson Farms Ltd	General - Support	General support for the flood risk policy	Support noted
ANON-QNH5-RDXE-F	Martin North	Individual / member of the public		Great Dunmow - increased flood risk	A comment raising concerns about the potential for increased flooding in the Church End area due to the exacerbated risk of flooding caused by the allocation there. It highlights recent flood events and refers to a previous refusal of a 50-home scheme, partly on the grounds of increased flood risk downstream.	All strategic site allocations, including those at Great Dunmow, are supported by a Level 2 Strategic Flood Risk Assessment which models the flood risk from a wide range of sources. The Council is content that flood risk can be managed through application of the mitigation measures recommended in the SFRA alongside the requirements of Core Policies 36 (Flood Risk) and 37 (Sustainable Drainage Systems). All proposals for development on the strategic allocations must be accompanied by a site-specific Flood Risk Assessment which should demonstrate how flood risk will be managed.
ANON-QNH5-RDHJ-4	Pascale Muir	Individual / member of the public		Localised Flooding - Church End	Comments highlighting flooding around Church End impacting on Bigods Lane, with photos showing this flooding attached. The comment also rejects the idea of SuDs as a 'cure all' solution when building new development. Overall, the comment requests that the allocated sites around Church End be reconsidered due to the risk of flooding.	The Local Plan is informed by updated flood risk evidence in the Level 2 SFRA. The SFRA includes detailed flood modelling on the allocated sites that has been agreed with the Environment Agency, and it identifies mitigation strategies for each site to minimise on-site flood risk and any off-site impacts. All proposals for these sites must comply with national policy requirements on flooding, the requirements of the Local Plan and the site development templates which have been prepared in accordance with the recommendations of the SFRA.
ANON-QNH5-RD19-V	Giles Ward	On behalf of an Organisation	Environment Agency	Natural Flood Management	Comment recommending that Natural Flood Management Projects in upper reaches of river catchments to alleviate flow and flooding issues downstream, are mentioned in the Local Plan document. They cite that it has been included in the Water Cycle Study (Table 9.4, pg 133) but not the Local Plan document.	Noted. The Council recognises the importance of Natural Flood Management projects to alleviate flow and flooding issues downstream as recommended by the Water Cycle Study and SFRA and will propose a modification to include a reference to NFM.
ANON-QNH5-RDMM-C	Christine Griffin	On behalf of an Organisation	Newport Parish Council	Omission of Newport and Ashdon in	Comment highlighting the omission of Newport in paragraphs 9.141 and 9.142 in relation to flood risk. They cite a claim in Appendix 3 regarding inaccurate information regarding the risk of flooding in Newport. Another	The Tier 2 and Tier 3 settlements identified in paragraph 9.142 are taken from the 2021 Level 1 Strategic Flood Risk Assessment, which were in turn derived from the Essex Preliminary Flood Risk Assessment. Paragraph 9.142 also contains a short, non-exhaustive list of other settlements outside these two tiers with a history of

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RD1U-R	Harriet Burrow	On behalf of an Organisation	Ashdon Neighbourhood Plan Steering Group	areas of Local Flood Risk.	comment also queries the omission of Ashdon in these paragraphs and presents information from the Neighbourhood Plan as evidence.	surface water flooding. Whilst Newport is not referred to, the Council considers that most recent Level 1 SFRA clearly acknowledges the risk of surface water flooding in Newport and Ashdon, as illustrated in the detailed mapping in Appendix 1.
ANON-QNH5-RDYX-3	Lynette Young	On behalf of an Organisation	Clavering Parish Council	Policy Wording - conformity with NPPF	Comment requesting that the words 'where possible' are removed from the first paragraph of the policy. The comment suggests that this is contrary to the NPPF which requires a sequential test to be carried out.	The sequential test requires that other 'reasonably available' sites are considered before development is proposed on a site at risk of flooding. However, if no reasonably available alternative sites exist then the proposed development may be acceptable if the exception test is passed. The proposed removal of the words "where possible" from the policy has the potential to reduce its conformity with national policy which does allow development to take place on sites at risk of flooding subject to appropriate mitigation of that risk and consideration of other benefits which may outweigh the flood risk.
ANON-QNH5-RD19-V	Giles Ward	On behalf of an Organisation	Environment Agency	Sequential approach - Inclusion in policy	A comment requesting that the requirements in paragraph 9.145 be put in the policy itself to strengthen the policy and ensure development in high risk areas is in accordance with paragraph 168 of the NPPF.	Noted. All development is required to reduce, and where possible, avoid the risk of flooding elsewhere. To do this national policy requires all development proposals to apply the sequential approach. The council does not believe it is necessary to repeat national requirements in policy.
ANON-QNH5-RDCT-9	Sophie Pain	On behalf of an Organisation	Pigeon	Sequential test - strategic allocations	A suggestion that policy be amended with regard to strategic allocations to remove the requirement for the sequential test at the planning application stage where such sites include land within Flood Zone 2 or 3, in accordance with the PPG. They consider this makes the policy unsound as the Local Plan site selection process considers alternative sites, including consideration of flood risk using the evidence from the Level 1 and Level 2 SFRA.	The council will explore this issue further during the course of the examination and will consider whether a modification is necessary.
ANON-QNH5-RD19-V	Giles Ward	On behalf of an Organisation	Environment Agency	SFRA cumulative impacts	Comment noting disappointment that the recommendations set out in the cumulative impact assessment in the Level 1 SFRA have not been incorporated into the Local Plan policies.	The site development templates include reference to the Level 2 SFRA recommendations for allocated sites, which do include consideration of potential cumulative impacts. Cumulative impacts should also be considered through the site-specific FRAs as required under Core Policy 36.
ANON-QNH5-RD19-V	Giles Ward	On behalf of an Organisation	Environment Agency	SFRA recommendations	A comment highlighting that opportunities set out in sections 8.1.6, 8.1.7 and 8.2.9 of the Level 1 SFRA be considered in the Local Plan so that the causes and impacts of flooding are reduced.	Noted. These recommendations will be considered ensuring that the protection of rivers and the causes and impacts of flooding are reduced. It is important to note that some of these are already covered within Core Policies 40 and 35 already.
ANON-QNH5-RDXJ-M	Rodelle Beauchamp	Individual / member of the public		Sources of flood risk	A comment seeking clarification on the evidence supporting the statement in the Local Plan that the sources of past flooding are primarily main rivers, ordinary watercourses and surface water. It suggests that flooding is caused by greenfield sites being developed.	The Local Plan is supported by a Strategic Flood Risk Assessment that considers the sources of flood risk in the District and provides an assessment of the likelihood of future flooding events. The evidence in the SFRA demonstrates the primary sources of historic flooding are main rivers, ordinary watercourses and surface water (which includes run-off from both man-made and natural surfaces). All new developments are expected to manage surface water flood risk through on-site mitigation, in accordance with the requirements of Core Policy 36 and Core Policy 37.

Core Policy 37: Sustainable Drainage Systems

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RD1W-T	Zhanine Smith	On behalf of an Organisation	Essex County Council	9.489 - Detailed SuDS guidance	<p>Comment requesting additional text to be included in paragraph 9.489 to clarify ECCs position large infiltration and attenuation basins and when they are acceptable.</p> <p>The specific wording requested is:</p> <p>“Although the Lead Local Flood Authority does not support infiltration basins within contaminated ground, large infiltration basins are acceptable within areas where high water tables are found, as lined SuDS features are acceptable should site conditions allow.”</p>	Noted. The Council considers that additional clarification is not required since the LLFA's SuDS design guide is already referenced in paragraph 9.489 and proposals will be considered against this guidance and national policy.

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RD19-V	Giles Ward	On behalf of an Organisation	Environment Agency	Deep borehole SuDS	Concern raised from the EA about the active encouragement of the use of deep borehole SUDS in paragraph 9.136 and paragraph 9.149. They highlight that deep infiltration systems have an inherent pollution risk. They also cite UDCs response stating that additional supporting text had been added	Noted. The Council will propose additional text to clarify the contamination risks associated with boreholes but considers the use of infiltration boreholes should be acknowledged because of their benefits to chalk aquifer recharge.
ANON-QNH5-RD19-V	Giles Ward	On behalf of an Organisation	Environment Agency	EA - Support	A comment from the Environment Agency which expresses appreciation for the updates made to Core Policy 37 and its associated test. These updates include acknowledging the limitations of infiltration drainage in certain scenarios, such as contaminated land and high groundwater levels. They also note the inclusion of a recommended guidance document.	Support noted.
ANON-QNH5-RD19-V	Giles Ward	On behalf of an Organisation	Environment Agency	Groundwater protection statements	Comment requesting that the Environment Agency's Approach to Groundwater protection be referenced, particularly statements G1 and G9 to G13. They cite that these were previously recommended to the council.	Noted. The Council will ensure that this guidance is referred to in the contamination section of Core Policy 34.
ANON-QNH5-RD1W-T	Zhanine Smith	On behalf of an Organisation	Essex County Council	Inappropriate circumstances	Comment suggesting removing the inappropriate circumstances clause in the first paragraph of the policy specifically: “...., unless it can be demonstrated to be inappropriate or there would be significant harm to water quality, flood risk or biodiversity”. They suggest that this should be removed because it is open to interpretation and will give rise to challenge, when SuDS should be encouraged. It also doesn't stipulate how "inappropriate" will be assessed and what evidence is required to demonstrate this.	The council disagrees with this position, as developments need consider balance all factors in their specific context when assessing harm. In line with national policy, the policy as currently worded provides sufficient flexibility in cases where the applicant can demonstrate that the use of SuDS is inappropriate. The modification suggested would be overly restrictive.
ANON-QNH5-RD1W-T	Zhanine Smith	On behalf of an Organisation	Essex County Council	Landscape Strategy	Comment requesting a statement be added to paragraph 9.148, to ensure joined up thinking for matters relating to SuDS they specific request that SuDS should be included as part of the Landscape Strategy and that early engagement with the Local Authority is encouraged. The specific wording for this is: “SuDS should be included as part of the Landscape Strategy and early engagement with the Lead Local Flood Authority is encouraged to ensure all opportunities to increase amenity, biodiversity and multifunctional areas have been considered.”	Noted. The council believes that additional clarity could be provided to encourage joined up thinking around SuDS
ANON-QNH5-RD1W-T	Zhanine Smith	On behalf of an Organisation	Essex County Council	London Stansted Airport - Core Policy 37	Comment requestion that in accordance with CAA guidance, London Stansted Airport should be consulted regarding any new development within 13km of the airport, to ensure early input into the viability and requirements of SuDS proposed. It is specifically requesting additional text for core policy 34 to be: “London Stansted Airport should be consulted regarding any new development within 13km of the airport, to ensure early input into the viability and requirements of the SuDS proposed.”	The Council agrees that the proposed modification would provide further clarity on the geographical extent of the consultation zone around Stansted Airport.
ANON-QNH5-RD1W-T	Zhanine Smith	On behalf of an Organisation	Essex County Council	London Stansted Airport - 9.151	Comment requestion that in accordance with CAA guidance, London Stansted Airport should be consulted regarding any new development within 13km of the airport, to ensure early input into the viability and requirements of SuDS proposed. It is specifically requesting additional text for paragraph 9.151 to be: “London Stansted Airport should be consulted regarding any new	The Council agrees that the proposed modification would provide further clarity on the geographical extent of the consultation zone around Stansted Airport.

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
					development within 13km of the airport, to ensure early input into the viability and requirements of the SuDS proposed.”	
ANON-QNH5-RD7U-X	Saffron Walden Town Council	On behalf of an Organisation	Saffron Walden Town Council	Management and maintenance - vagueness	Comments requesting more clarity on how SuDS proposals should be managed throughout their lifetime. They say that the current wording is vague and it should make clear that residents don't incur an additional management charge from a management company for SuDS. They also request that this statement be strengthened to ensure that all development proposals "must" include these arrangements and that the LLFA take on SuDS units provided they are built to an acceptable standard.	SuDs delivered in new developments will be subject to Core Policy 67A to ensure they are managed effectively. In addition, development proposals should have regard to the SuDS design guide for Essex which covers maintenance and adoption requirements.
ANON-QNH5-RD7U-X	Saffron Walden Town Council	On behalf of an Organisation	Saffron Walden Town Council	Management and maintenance - vagueness	Comments requesting more clarity on how SuDS proposals should be managed throughout their lifetime. They say that the current wording is vague and it should make clear that residents don't incur an additional management charge from a management company for SuDS. They also request that this statement be strengthened to ensure that all development proposals "must" include these arrangements and that the LLFA take on SuDS units provided they are built to an acceptable standard.	SuDs delivered in new developments will be subject to Core Policy 67A to ensure they are managed effectively. In addition, development proposals should have regard to the SuDS design guide for Essex which covers maintenance and adoption requirements.
ANON-QNH5-RDCT-9	Sophie Pain	On behalf of an Organisation	Pigeon	Policy wording - flexibility	Comment arguing that the SuDs policy is overly restrictive and therefore wording should be amended with the addition of 'Subject to relevant planning and development constraints' at the beginning of the 1st paragraph in the policy.	The Council is committed to reducing and effectively managing the District's vulnerability to surface water flooding, but recognises that the use of SuDS is not a universal solution to flood risk. In line with national policy, the policy as currently worded provides sufficient flexibility in cases where the applicant can demonstrate that the use of SuDS is inappropriate. The Council does not consider that the proposed modification is necessary since it would not increase the effectiveness of the policy or add any further flexibility.
ANON-QNH5-RD19-V	Giles Ward	On behalf of an Organisation	Environment Agency	Retrospectively fitting SuDS	Comment highlighting that there isn't a commitment to retrospectively fitting SuDS where needed. Although they do state that there is mention in the policy of different materials that can be used in urban settings that could also help improve infiltration and temporary storage.	The Local Plan cannot require existing developments to retrospectively incorporate SuDS, but the Council will ensure that the requirements of Core Policy 37 are applied when considering proposals for redevelopment of previously developed land.
ANON-QNH5-RDZF-J	Anglian Water	On behalf of an Organisation	Anglian Water	Sewage Undertaker Engagement	Comment asking that paragraph 9.146 clarifies for development that requires surface water connections to be connected to the public sewerage network to engage with the relevant sewerage undertaker at the earliest opportunity and have regard to their surface water drainage guidance.	The Council agrees that the suggested amendment would provide additional clarity to ensure that the developer engages with the relevant water and sewerage company, although connections to the sewerage network would be a last resort in terms of the management of surface water.
ANON-QNH5-RDN8-R	Great Dunmow Town Council	On behalf of an Organisation	Great Dunmow Town Council	SuDS - Support	Supportive comment recognising that the policy is sound and in conformity with Chapter 14 of the NPPF.	Support noted.
BHLF-QNH5-RDEH-Y	Essex County Fire and Rescue Service	On behalf of an Organisation	Essex County Fire and Rescue Service	SuDS - use by emergency services	Essex County Fire and Rescue Service request that opportunities to utilise SuDS for sustainable access of water for firefighting are explored.	Although the strategic policy doesn't require developments to provide SuDS for this purpose specifically, it does promote the multi-functional design of SuDS. There is the potential for SuDS, particularly those which include attenuation ponds, to be used for firefighting depending on their location and design. The fire service is encouraged to comment on specific major planning applications which are required by Core Policy 37 to include SuDS in order to secure emergency access provisions within the design where practical and appropriate.
ANON-QNH5-RD4S-S	Bill Critchley	Individual / member of the public		SuDS hierarchy	Comment highlighting that Essex County Council is the LLFA and that the policy should align with ECC guidance including the hierarchy for drainage management.	As set out in the supporting text, proposals will be considered against the relevant technical standard and advice from the Lead Local Flood Authority, and developers should consider the guidance set out in the Sustainable Drainage Systems Design Guide for Essex. No modification is proposed.
ANON-QNH5-RD1W-T	Zhanine Smith	On behalf of an Organisation	Essex County Council	Surface water connections.	Comment highlighting that Essex County Council as the Lead Local Flood Authority does not support criterion v of the policy and that connecting surface water to sewers can mean that these systems can become overwhelmed, increasing the risk of flooding and pollution	Noted. The council believes that this criterion is necessary to ensure that all circumstances are considered. It is only meant as a last resort and it clarifies that developments need to demonstrate that there are no feasible alternatives and that there is no detriment to existing users. This follows the hierarchy in Essex's SuDS design

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
					occurring . They request that the criterion be replaced with: "v. surface water connections to the public sewerage network are not supported by the Lead Local Flood Authority as these systems can become overwhelmed, increasing the risk of flooding and pollution occurring"	guide. Essex County Council, as Lead Local flood Authority, will be consulted through the development management process and can make representations on whether such connections are appropriate.
ANON-QNH5-RDZK-Q	Chris Colloff	On behalf of an Organisation	Thames Water Utilities Limited	Type of development	Comment supporting the requirements of the SuDS policy but stating that it is unclear to what type of development it will apply to. They specifically refer to the fact that the first paragraph refers to major development. Whereas the first criterion of the policy refers to all new development. They also point to the fact that minor development should use SuDS when surface water runoff cannot adequately be managed by permeable paving but that permeable paving itself is a SuDS and such there is already a requirement to for SuDS to be incorporated into a minor development.	The Council is content that this is sufficiently clear in the policy and that although minor development doesn't require SuDS in itself it has to demonstrate that surface water is managed. Permeable paving is a component of some SuDS designs and can provide a means of effectively managing surface water on its own within minor development, but where it is insufficient to manage surface water the Council will expect SuDS to be employed, as set out in the policy.

Core Policy 38: Sites Designated for Biodiversity and Geodiversity

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RDCT-9	Sophie Pain	On behalf of an Organisation	Pigeon	Core Policy 38 - Clarity and flexibility	Two respondents representing the same organisation stated that the policy as worded is overly restrictive. They have proposed modifications to provide clarity and greater flexibility.	The NPPF is clear that planning policies should contribute and enhance the natural environment by protecting and enhancing sites of biodiversity and geological interest, and the Local Plan seeks to deliver against this requirement. The proposed amendment would weaken the policy through the introduction of conditionality to the requirement to protect and enhance designated assets. The proposed modification, in seeking to remove the reference to the consideration of alternative development sites as a means of avoiding significant harm, would also reduce the Local Plan's compliance with NPPF paragraph 186(a). The Council will consider whether greater clarity can be introduced by replacing the reference to "other biodiversity or geodiversity interest" with "designated bio- or geo-diversity sites other than a Habitats Site".
ANON-QNH5-RDAU-8	Alex Cole	On behalf of an Organisation	Pigeon (Takeley) Ltd			
ANON-QNH5-RDN8-R	Great Dunmow Town Council	On behalf of an Organisation	Great Dunmow Town Council	Core Policy 38 - Support	Great Dunmow Town Council is supportive of the protections afforded to designated biodiversity and geodiversity sites and its accordance with the NPPF and policies in the Great Dunmow Neighbourhood Plan. Newport Parish Council is supportive of the policy and its relevance to the parish.	Support noted
ANON-QNH5-RDMM-C	Christine Griffin	On behalf of an Organisation	Newport Parish Council			
ANON-QNH5-RD7U-X	Saffron Walden Town Council	On behalf of an Organisation	Saffron Walden Town Council	Designated sites list	Saffron Walden Town Council suggest that the supporting text and Appendix 10 should contain a list of designated sites and habitats.	As set out in the supporting text (Paragraphs 9.155 and 9.156) there are over 300 statutorily protected and non-statutorily protected biodiversity and geodiversity sites in the District. These sites are shown on the Policies Map, and Core Policy 38 provides protections for these sites. The benefits of listing the sites within the supporting text and appendices are unclear, and doing so may result in the information in the plan becoming outdated as sites are added or removed from the list during the plan period.
ANON-QNH5-RDZN-T	Fiona Martin	On behalf of an Organisation	Natural England	Essex Coast Habitats Sites	Natural England welcomes the changes to Core Policy 38 from the Regulation 18 Plan, but requests additional text to clarify the rationale for the Essex Coast RAMS tariff and the expectation that large schemes within the zone of influence will be required to provide accessible green space of sufficient quantity and quality to mitigate any potential recreational impacts on the Habitats Sites.	The Council notes the support for Core Policy 38 and agrees that the proposed amendment to the Essex Coast section of Core Policy 38 would increase its effectiveness and make clear when contributions will be sought and when green infrastructure should be delivered on site and what quality standards it should adhere to. The Council will consider a modification which incorporates the suggested amendments provided by both the National Trust and Natural England.
ANON-QNH5-RD1W-T	Zhanine Smith	On behalf of an Organisation	Essex County Council	Essex County Council - modifications	Essex County Council has recommended several modifications to Core Policy 38 to ensure that the full range of statutory and non-statutory designations is reflected within the policy and that the policy is more closely aligned with the requirements of NPPF Paragraph 186. Additional	The Council welcomes the helpful recommendations and agrees that the proposed amendments will provide further clarity within Core Policy 38. Modifications will be proposed in accordance with ECC's recommendations.

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				to Core Policy 38	text is also recommended in relation to biodiversity net gain, including off-site net gain and management/maintenance plans,	
ANON-QNH5-RD1W-T	Zhanine Smith	On behalf of an Organisation	Essex County Council	Essex County Council - modifications to supporting text	Essex County Council has recommended several changes to the supporting text, as follows: - Paragraph 9.154: review and update the list of statutorily protected sites and non-statutory designations. - Paragraphs 9.154, 9.160 and 9.174: amend to ensure consistency with the Natural Environment and Rural Communities Act - Paragraph 9.155: Incldue reference to Local Nature Reserves - Paragraph 9.157: Amend to reflect NPPF paragraph 186 - Paragraph 9.158: Replace "Habitat Sites" with "other ecological sites"	The Council welcomes the helpful recommendations and agrees that the proposed amendments will provide further clarity within the supporting text. Modifications will be proposed in accordance with ECC's recommendations, with the exception of the proposed amendment to Paragraph 9.157 which appears to insert a national policy requirement into supporting text. Protection for Ancient Wodland and ancient and veteran trees is already included within the text of Core Policy 38.
ANON-QNH5-RD4W-W	Sandra Green	On behalf of an Organisation	National Trust	Hatfield Forest - Policy Criteria	The National Trust and Natural England seek modifications to Core Policy 38 in order to ensure that it provides robust protection for Hatfield Forest. The policy text should clearly state that new residential development within the Hatfield Forest Zone of Influence should make appropriate contributions towards the delivery of Strategic Access Management and Monitoring and contain a specific requirement for on-site green infrastructure to be delivered prior to the first occupation.	The Council notes the support for Core Policy 38 and agrees that the proposed amendment to the Hatfield Forest section of Core Policy 38 would increase its effectiveness and make clear when contributions will be sought and will consider a modification which incorporates the suggested amendments provided by both the National Trust and Natural England. However, the requirement for SANG to be complete by the time the first dwellings are occupied has the potential to prejudice the deliverability of strategic site allocations as it can take several years for planting to mature and, where SME developers are contributing to a mutli-phase development it may not be viable to deliver the SANG within their phasing plan. The Council is content that the current requirements of Core Policy 39 will ensure delivery as early as possible within the development timeline but will consider a modification to Core Policy 38 to reiterate this point.
ANON-QNH5-RDZN-T	Fiona Martin	On behalf of an Organisation	Natural England			
ANON-QNH5-RD4W-W	Sandra Green	On behalf of an Organisation	National Trust	Hatfield Forest - Supporting Text	The National Trust seeks modifications to paragraph 9.163 of the supporting text in order to ensure that it accurately reflects the purpose of the SAMMs.	The Council agrees that the proposed modification to the supporting text would add clarity on the purpose of the SAMMs and the role of the various bodies which cooperated in developing the mitigation strategy and will seek to amend the plan through an additional modification.
ANON-QNH5-RDWZ-3	David Corke	On behalf of an Organisation	Walden Countryside	Local Wildlife Sites	Request for re-surveying and preparation of management plans for Local Wildlife Sites. Highlights omissions of some LWS from evidence base.	<p>Core Policy 38 seeks to establish and maintain appropriate protections for sites which are designated for their biodiviersity and geodiversity value by providing a framework against which development proposals affecting designated sites can be considered. The Local Plan evidence base does not contain a comprehensive database of all biodiversity sites in the District, and the absence of a site or sites from the Plan or any evidence base studies does not indicate that these sites will be disregarded during the determination of planning applications. There is the opportunity to make representations on all applications, including those which have the potential to affect the integrity of sites designated for their biodiversity or geodiversity importance.</p> <p>The Local Plan does not seek to identify new biodiversity and geodiversity sites, review existing sites or put in place management plans for such sites. Designation is determined by bodies which are external to the Council, as is the management of such sites. However, Core Policies 39 and 40 do set out the Council's expectations for new greenspaces, including biodiversity sites, to be delivered alongside development proposals and for appropriate management arrangements to be put in place. No modification is proposed.</p>

Core Policy 39: Green and Blue Infrastructure

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RDWZ-3	David Corke	On behalf of an Organisation	Walden Countryside	Accessible Natural Greenspace provision	The Local Plan should seek to meet the standards of Accessible Natural Greenspace provision set out in Natural England Guidance and the policy should be modified to include the creation of at least one Country Park within three years.	The Council understands the importance of open space provision, and Core Policies 39 and 67 seek to improve access to open space of all types. The June 2024 Open Space Update notes that some parts of the District have shortfalls in natural and semi-natural greenspace provision, and to address this minimum standards for natural and semi-natural greenspace provision are set out in Appendix 17 of the Local Plan. Whilst Natural England's Accessible Natural Greenspace Guidance provides recommendations on appropriate levels of provision, it does not form statutory guidance and the Council's approach is to address existing shortfalls first to pave the way for future uplifts in provision.

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						The Local Plan will deliver open space to the east of Saffron Walden which could form the the initial phase of a Country Park, whilst Core Policy 15 sets out that contributions will be sought towards the creation of a Country Park at Church End, Great Dunmow.It would not be possible to deliver open space that meets the Country Park accreditation requirements within three years, and it is not considered that the proposed modification would be effective in the absence of a suitable tract of available land that could fulfil this purpose within the specified timeframe.
ANON-QNH5-RD4W-W	Sandra Green	On behalf of an Organisation	National Trust	Delivery of green infrastructure on strategic allocations	The National Trust seeks clarification that the policy applies to development on the strategic allocations, and states that SANGs delivered through the strategic site allocations should be complete and accessible prior to the occupation of the first dwelling in order to minimise recreational pressures on Hatfield Forest.	The Council agrees that the policy as currently worded does not clearly state that the strategic allocations are included within the definition of major development and are therefore subject to the requirements of the policy. An additional modification will be proposed to provide clarity on this issue. However, we do not propose to modify criterion vi of the policy to require SANGs on the strategic allocations to be complete and accessible prior to occupation of the first dwelling, as this is likely to present significant challenges with respect to the deliverability of large sites with multiple development phases and a number of developers. The policy sets out the Council's clear expectation that the green infrastructure and landscaping plan should be implemented early in the development timeline so that early occupiers benefit from mature planting and accessible greenspace. While in most cases it should be possible to landscape the site in tandem with the delivery of on-site utilities and other infrastructure, it may take several years to deliver large-scale greenspaces which meet Natural England SANG standards. If no homes can be occupied until this work is complete, there is the potential to affect the delivery of homes, with consequential impacts on viability. This is especially the case where SME developers are delivering a small number of homes on a large multi-phase scheme since they are unlikely to be able to accommodate a period of non-occupation within their development financing plans.
ANON-QNH5-RD1W-T	Zhanine Smith	On behalf of an Organisation	Essex County Council	Essex Couonty Council - policy modifications	Essex County Council has recommended several modifications to the policy text to ensure the correct terminology is used and to add a policy requirement for Landscape and Ecological Management Plans.	The council welcomes the helpful clarifications to this policy and the supporting text, and will propose modifications in line with ECC's recommendations.
ANON-QNH5-RD97-2	Lydia Sadler	On behalf of an Organisation	Stansted Airport Limited	Green and Blue Infrastructure - Impact on Aviation	Stansted Airport Limited highlights the potential for schemes delivering new or enhanced green and blue infrastructure to have adverse impacts on aviation by increasing the risk of bird strike. The comment notes the statutory requirement for consultation with the CAA, Secretary of State for Defence or the aerodrome operator where development is proposed within the safeguarding area of an officially safeguarded aerodrome, including the 13km zone around Stansted Airport. Stansted Airport Limited requests an additional paragraph is included which requires proposals to consider the effect on aviation, with a cross-reference to Core Policy 11 (London Stansted Airport).	A number of the policies in the Local Plan already include a section which covers aviation safety, with cross-reference to Core Policy 11. The Council considers that the requested modification to Core Policy 39 is helpful and would bring it into alignment with other policies, including Core Policies 15, 33 and 37.
ANON-QNH5-RDZV-2	n/a	On behalf of an Organisation	Chelmsford City Council	Green and Blue Infrastructure - Local Nature Recovery Strategy	Chelmsford City Council suggests that the policy could also include a reference to the Essex Local Nature Recovery Strategy (LNRS) to highlight county-wide aspirations and partnerships.	The policy does include a reference to "the Nature Recovery Strategies", but the Council agrees that as currently drafted it is not clear that this refers to the Essex LNRS and welcomes the request for a more explicit reference. An additional modification will be proposed to amend this reference.
ANON-QNH5-RDZX-4	Johnathan Dixon	On behalf of an Organisation	Savills on behalf of Audley End Estate	Green and Blue Infrastructure - Management	Audley End Estate state that the policy is unsound due to the requirement for all major development proposals to be accompanied by a Green and Blue Infrastructure Plan which sets out stewardship arrangements for a minimum 30 year period, to cover maintenance, management and funding. They suggest that this may duplicate the requirement under Core Policy 40 for proposals which include the	The Council considers that the requirement for a GBI Plan is essential for securing the long-term future of on-site green and blue infrastructure, whether that relates to the protection and enhancement of existing GBI or the creation of new natural areas and habitats. However, the crossover between this requirement and the similar requirement of Core Policy 40 is noted. In order to assist with the interpretation of both policies, the Council will propose an amendment to Core Policy 40 to the effect that the long-term management plan required under that policy should be produced in accordance with the requirements of Core Policy 39.

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				and Stewardship	creation of natural areas and habitats to be accompanied by a long-term management plan. They request that the policy is either further justified, amended or deleted.	
ANON-QNH5-RDAU-8	Alex Cole	On behalf of an Organisation	Pigeon (Takeley) Ltd	Green and Blue Infrastructure - policy flexibility	Pigeon (Takeley) seeks to add flexibility to the policy through a modification which would limit the scope of the policy's application and replace the word "must" with "should" in the second paragraph.	The Council expects all major development to preserve and enhance existing green and blue infrastructure and, where appropriate, deliver new GBI in accordance with the criteria set out in Core Policy 39 and the Green and Blue Infrastructure Strategy. The proposed modification would make the policy less effective by reducing the clarity over which proposals are subject to its requirements. Softening the policy requirement to "should" instead of "must" has the potential to result in under-delivery of GBI by creating an opportunity for its criteria to be challenged with each application. This is also likely to result in a protracted development management process, increasing lead-in times for new development as a result of negotiation over GBI provision.
ANON-QNH5-RDZN-T	Fiona Martin	On behalf of an Organisation	Natural England	Green and Blue Infrastructure - Reference to other policies	Natural England is supportive of Core Policy 39 and its detailed requirements but considers that direct reference to other policies would serve to further strengthen the policy, including Core Policies 35, 36, 37 and 38.	The support for the policy is noted. The Council agrees that the inclusion of references to other policies in the plan would assist in strengthening the relationship between policies and ensuring that the role of green and blue infrastructure in delivering wider policy objectives is made more explicit. An additional modification will be proposed to that effect.
ANON-QNH5-RD7U-X	Saffron Walden Town Council	On behalf of an Organisation	Saffron Walden Town Council	Green and Blue Infrastructure - Saffron Walden	Saffron Walden Town Council supports the identification of Hatfield Forest as an important green space and requests that three additional green spaces in and around Saffron Walden are referenced in the supporting text of Chapter 9	The Council recognises the importance of all green spaces across the District, and the plan includes several policies which seek to ensure they are preserved and enhanced. In addition to the general protections for biodiversity assets and existing green infrastructure provided by Core Policies 38 and 39, Public Rights of Way, including Beechy Ride, are protected through Core Policy 30, whilst designated heritage assets including Audley End and Bridge End Gardens are protected through Core Policies 61 and 62. Hatfield Forest is given specific mention and policy protection due to the significant existing recreational pressure on the SSSI/NNR and the mitigation strategy which seeks to alleviate this pressure, whereas this is not the case for the green spaces mentioned in the representation. The Council does not consider that the plan requires modification to include specific reference to these assets.
ANON-QNH5-RDCT-9	Sophie Pain	On behalf of an Organisation	Pigeon	Green and Blue Infrastructure - Strategic Allocations	Pigeon seek a modification to the proposal to the effect that major development considered under the policy should exclude development on the Local Plan strategic allocations in North and South Uttlesford.	The Council considers that the policy should apply to all major development, including proposals for development on the sites allocated in the Local Plan. Whilst the site development templates set out site-specific requirements for green and blue infrastructure on the strategic sites, these are not intended to replace the Core Policies but instead to provide guidance on the appropriate measures which can be taken on each site to ensure that they accord with the Green and Blue Infrastructure Strategy. The policy also contains requirements which are not included in the site development templates related to the long-term management of green infrastructure, and it is important that all major developments are in accordance with these requirements. No further modification is proposed.
ANON-QNH5-RD7U-X	Saffron Walden Town Council	On behalf of an Organisation	Saffron Walden Town Council	Green and Blue Infrastructure - SuDS	Saffron Walden Town Council requests a modification to core Policy 39 to the effect that SuDS should not be considered as open space or their surface area included within the calculation of developer contributions to open space provision.	Core Policy 37, Core Policy 39 and the Sustainable Drainage Systems Design Guide for Essex all recognise the potential multi-functional benefits of SuDS, including the contribution of well-designed SuDS towards open space provision, amenity and biodiversity enhancements. While not all SuDS approaches will result in new open space, the Council does not agree that it is not possible for SuDS to also be classified as open space, since they can include vegetated green spaces alongside water attenuation and dispersal features. A blanket policy to exclude them from consideration of the level of open space provided on site is unjustified, and a more flexible approach is required which allows for each proposal to be judged on its individual merits, with open space provision being calculated according to the site-specific SuDS design.
ANON-QNH5-RDN8-R	Great Dunmow Town Council	On behalf of an Organisation	Great Dunmow Town Council	Green and Blue Infrastructure - Support	Comments supporting Core Policy 39 from individuals and organisations, including: - Great Dunmow Town Council, noting the policy's accordance with the NPPF and policies in the Great Dunmow Neighbourhood Plan. - Historic England, noting the reference to the historic environment - Sport England, noting the prioritisation of Green and Blue Infrastructure, the recognition of its role in providing open space for	Support noted
BHLF-QNH5-RDES-A	Andrew Marsh	On behalf of an Organisation	Historic England			

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ANON-QNH5-RD4R-R	Roy Warren	On behalf of an Organisation	Sport England		sport and recreation and its contribution towards NPPF requirements for planning policies to enable healthy lifestyles. - Chelmsford City Council - Gladman Developments, noting that their development schemes include multi-functional GBI provision	
ANON-QNH5-RDC1-6	Paul Anderson	Individual / member of the public				
ANON-QNH5-RD4S-S	Bill Critchley	Individual / member of the public				
ANON-QNH5-RDZV-2	n/a	On behalf of an Organisation	Chelmsford City Council			
ANON-QNH5-RDRS-Q	Richard Agnew	On behalf of an Organisation	Gladman Developments Ltd			

Core Policy 40: Biodiversity and Nature Recovery

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RD67-Y	Will O’Conn or MSc BSc CEcol MCIEEM	Individual / member of the public		Biodiversity - policy strengthenin g	A response was received from a chartered ecologist suggesting additional strengthening of Core Policy 40, to include the following: - Further details over Habitats and Species of Principal Importance, other species of conservation concern such as Bird of Conservation Concern, the appropriate use of ecological records in planning applications and the use of the mitigation hierarchy. - Amendment to paragraph 9.175 to change " new homes should include integrated habitats" to "new homes and other buildings must include" to widen its application to non-residential development and to strengthn the requirement. - Clear statement of the number of swift and bat boxes per home or per m2 of commercial development. - requirement for all planning applications to be supported by up-to-date ecological assessments for all appropriate species groups and a full (rather than preliminary) ecological impact assessment which sets out the scale/type of impact, and all mitigation, compensation and enhancement measures.	The Council notes the request for additional strengthening of Core Policy 40, but considers that the majority of the requested modifications would lead to repetition of the requirements of Core Policy 38. This includes the requirement for all development proposals which have the potential to affect designated biodiversity sites and habitats which could or do support protected species to be accompanied by an ecological survey and impact assessment prepared by a suitably qualified ecologist. With regard to integrated habitats, the requirements for swift bricks and bat boxes are set out in the Uttlesford Design Code (codes N3.35 and N3.36), which includes detail on appropriate grouping and a reference to the 2022 guidance on siting issued by Swift Conservation. The Council considers that the proposed amendment to paragraph 9.175 from "should" to "must" is unnecessary in the absence of a statutory requirement to provide integrated habitats, but will consider whether to broaded the application to non-residential development as proposed.
ANON-QNH5-RD39-X	Mark Edgerley	On behalf of an Organisation	Boyer on behalf of Higgins Group	Biodiversity Net Gain - 20% requirement	A number of comments were received from developers and site promoters suggesting that the minimum 20% BNG requirement exceeds the requirement of the Environment Act without justification, and requesting modification to the policy so that it reflects the statutory requirement of 10% BNG. A number of comments suggest the increased requirement will reduce developable area and therefore limit site capacity. Respondents raise viability concerns, with several noting that the viability assessment's assumptions on the cost of off-site credits fall short of current actual costs. The application of the policy to non-residential sites is also questioned. Comments refer to guidance in the	The Council considers that the requirement for a minimum 20% Biodiversity Net Gain is both necessary and achievable. A Biodiversity Net Gain study was published in July 2024 and will be submitted alongside the plan which demonstrates the extent of habitat depletion in the District as well as the opportunities to address this situation. As set out in the Local Plan, the District has the third lowest biodiversity in Essex, and is significantly below the national average for its size. Habitats have been degraded as a result of monocultural arable production and the impacts of development and there is a large potential for improvement through the 20% requirement. The Local Plan evidence base demonstrates that development would remain viable across the District when an increase from the statutory minimum 10% to 20% is taken into account. The Council does not believe that the proposed increase above the statutory minimum will automatically result in the need for larger sites or a reduction in the capacity of development sites, although it will require detailed consideration of the
ANON-QNH5-RDCT-9	Sophie Pain	On behalf of an Organisation	Pigeon			
ANON-QNH5-RDNS-K	Andy Stevens	Individual / member of the public	ASP on behalf of Mr John Noble			

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ANON-QNH5-RDH1-B	Mary Power	On behalf of an Organisation	PowerHaus Consultancy on Behalf of Richstone Procurement Ltd		PPG which states that planmakers should not seek a higher level of provision that the statutory minimum of 10% unless this is justified. Several respondents suggest that if the 20% requirement is retained, flexibility should be built into the policy to the effect that the 10% above the statutory minimum will be subject to consideration of viability.	most effective way to deliver on-site net gain. The Council considers that the policy requirement of 20% should apply equally to residential and non-residential schemes, and no modification is proposed to this requirement. However, an additional modification will be proposed which includes a reference to development which is exempt from the statutory minimum as it is considered that this would assist in clarifying the application of the policy. The Council also notes the potential for off-site BNG units to increase in cost above the assumptions used in the viability assessment, as well as for other site-specific constraints to affect site viability. On that basis, a modification will be proposed that allows for a flexible, viability-led approach to the elevated BNG requirement.
ANON-QNH5-RDZX-4	Johnathan Dixon	On behalf of an Organisation	Savills on behalf of Audley End Estate			
ANON-QNH5-RD97-2	Lydia Sadler	On behalf of an Organisation	Stansted Airport Limited			
ANON-QNH5-RD6D-C	Sophie Innes	On behalf of an Organisation	Dianthus Land Ltd			
ANON-QNH5-RD7H-H	Charlotte Cook	On behalf of an Organisation	SEGRO			
ANON-QNH5-RD7K-M	David Poole	On behalf of an Organisation	Weston Homes			
ANON-QNH5-RDWE-E	Graeme Warrnier	On behalf of an Organisation	Stantec on behalf of Ropemaker Properties Ltd			
ANON-QNH5-RDWU-X	Tara Lewis	On behalf of an Organisation	DLP Planning Ltd on behalf of Salacia Ltd			
ANON-QNH5-RDWQ-T	Amy Lomath	On behalf of an Organisation	Taylor Wimpey			
ANON-QNH5-RDA6-9	Jonathan Dixon	On behalf of an Organisation	Savills on behalf of Endurance Estates Limited			
ANON-QNH5-RDAU-8	Alex Cole	On behalf of an Organisation	Pigeon (Takeley) Ltd			
ANON-QNH5-RDAH-U	Steven Butler	On behalf of an Organisation	Vistry Group (Thaxted)			
ANON-QNH5-RDAD-Q	Marie Jasper	On behalf of an Organisation	Landsec			
ANON-QNH5-RDAX-B	Tom Vernon (Agent)	On behalf of an Organisation	Portland Capita			

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ANON-QNH5-RDRA-5	Robert Barber	On behalf of an Organisation	Pegasus Group on behalf of Bloor Homes Eastern			
ANON-QNH5-RD39-X	Higgins Group	On behalf of an Organisation	Boyer on behalf of Higgins Group			
ANON-QNH5-RD3H-D	Kim Rickards	On behalf of an Organisation	Durkan Estates Ltd			
ANON-QNH5-RDRS-Q	Richard Agnew	On behalf of an Organisation	Gladman Developments Ltd			
ANON-QNH5-RDDJ-Z	Mark Behrendt	On behalf of an Organisation	Home Builders Federation	Biodiversity Net Gain - 20% requirement (Home Builders Federation)	The Home Builders Federation suggests that the minimum 20% BNG requirement is unjustified. They highlight the guidance in the PPG which states that planmakers should not seek a higher level of provision than the statutory minimum of 10% unless this is justified, and state that the policy should be supported by strong evidence on the negative impact of development (as opposed to other causes such as agriculture) on biodiversity in the District on biodiversity and on the viability of the policy requirement, which should be based on actual rather than assumed costs. The HBF notes that the viability assessment uses costs from the Government's 2019 Impact Assessment which are based on a 2017 study which looks at the costs of delivering net gains on farmland rather than on development sites, and that its assumptions on the cost of off-site credits fall short of current actual costs. They also note that ongoing management costs may also reduce site viability, at the same time as the increased minimum requirement has the potential to reduce a site's capacity to accommodate new homes. It is suggested that either the policy should be modified to reflect the statutory minimum of 10%, or, if the 20% requirement remains in place it should be modified to make the additional 10% subject to viability with scope for reduction where it can be demonstrated that 20% would make the development unviable.	The Council considers that the requirement for a minimum 20% Biodiversity Net Gain is both necessary and achievable. A Biodiversity Net Gain study was published in July 2024 and will be submitted alongside the plan which demonstrates the extent of habitat depletion in the District as well as the opportunities to address this situation. As set out in the Local Plan, the District has the third lowest biodiversity in Essex, and is significantly below the national average for its size. Habitats have been degraded as a result of monocultural arable production and the impacts of development and there is a large potential for improvement through the 20% requirement. The Local Plan evidence base demonstrates that development would remain viable across the District when an increase from the statutory minimum 10% to 20% is taken into account. The Council does not believe that the proposed increase above the statutory minimum will automatically result in the need for larger sites or a reduction in the capacity of development sites, although it will require detailed consideration of the most effective way to deliver on-site net gain. The Council considers that the policy requirement of 20% should apply equally to residential and non-residential schemes, and no modification is proposed to this requirement. However, an additional modification will be proposed which includes a reference to development which is exempt from the statutory minimum as it is considered that this would assist in clarifying the application of the policy. The Council also notes the potential for off-site BNG units to increase in cost above the assumptions used in the viability assessment, as well as for other site-specific constraints to affect site viability. On that basis, a modification will be proposed that allows for a flexible, viability-led approach to the elevated BNG requirement.
ANON-QNH5-RD97-2	Lydia Sadler	On behalf of an Organisation	Stansted Airport Limited	Biodiversity Net Gain - Impact on Aviation	Stansted Airport Limited highlights the potential for schemes delivering biodiversity net gain to have adverse impacts on aviation by increasing the risk of bird strike. The comment notes the statutory requirement for consultation with the CAA, Secretary of State for Defence or the aerodrome operator where development is proposed within the safeguarding area of an officially safeguarded aerodrome, including the 13km zone around Stansted Airport. Stansted Airport Limited requests an additional paragraph is included which requires proposals to consider the effect on aviation, with a cross-reference to Core Policy 11 (London Stansted Airport).	A number of the policies in the Local Plan already include a section which covers aviation safety, with cross-reference to Core Policy 11. The Council considers that the requested modification to Core Policy 40 is helpful and would bring it into alignment with other policies, including Core Policies 15, 33 and 37.
ANON-QNH5-RDZF-J	Anglian Water	On behalf of an Organisation	Anglian Water	Biodiversity Net Gain - Infrastructure Delivery	Anglian Water and Thames Water suggest that the 20% BNG requirement should not be applicable to infrastructure development as it would add costs and reduce the ability of infrastructure providers to deliver critical upgrades to operational sites. Both companies note that upgrades to their water treatment works will help to deliver sustainable growth and ecological improvements, including downstream biodiversity and nature	The Council recognises that infrastructure delivery is critical to achieving sustainable growth, and recognises the operational challenges associated with delivering a higher standard of BNG than the statutory 10%. The additional clarification to Core Policy 40 suggested by Thames Water is helpful and the Council will consider proposing a modification to this policy so that essential infrastructure can be delivered in a timely manner to support growth over the plan period and national environmental objectives.
ANON-QNH5-RDZK-Q	Chris Colloff	On behalf of an Organisation	Thames Water Utilities Limited			

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					recovery benefits.Thames Water has suggested a modification to Core Policy 40 which provides an exemption to the policy requirement for 20% BNG.	
ANON-QNH5-RD3H-D	Kim Rickards	On behalf of an Organisation	Durkan Estates Ltd	Biodiversity Net Gain - off-site provision	Comment suggesting that the policy should be revised to recognise the flexible mechanisms in the Environment Act for off-site provision and the use of biodiversity credits where BNG cannot be delivered on site or within close proximity to the site.	The policy as worded provides examples of alternative arrangements where on-site BNG cannot be delivered, but it is not necessary for the Local Plan to repeat the full extent of the mechanisms available through the Environment Act since these are already set out in legislation and associated guidance. No modification is proposed.
ANON-QNH5-RD4S-S	Bill Critchley	Individual / member of the public		Biodiversity Net Gain - Red List Species	Comment expressing support for the 20% BNG requirement, with reference to studies highlighting species decline and the importance of habitat restoration. The respondent suggests that proposals should identify red list species that may be affected by development and provide suitable mitigation measures.	The Council notes the support for Core Policy 40. The policy is designed to secure ambitious levels of net gain from new developments, whereas existing habitats are more comprehensively addressed in Core Policy 38. This includes the requirement for an ecological survey where proposals have the potential to affect protected species on the Red List of threatened species or habitats which could support those species. Where such proposals have the potential to cause significant harm to such species or habitats, Core Policy 38 requires consideration of alternative sites or, in the absence of suitable alternatives, adequate mitigation measures.
ANON-QNH5-RDNN-E	Stephen Kelly	On behalf of an Organisation	Greater Cambridge Shared Planning (on behalf of Cambridge City Council and South Cambridgeshire District Council)	Biodiversity Net Gain - Support	Comments from individuals and organisations expressing support for the Local Plan approach to biodiversity, including the minimum 20% BNG requirement, including responses from: - Natural England - Greater Cambridge Shared Planning - Great Dunmow Town Council - Little Easton Parish Council - Littlebury Parish Council	The Council notes and welcomes the support for the minimum 20% Biodiversity Net Gain requirement.
ANON-QNH5-RDN8-R	Great Dunmow Town Council	On behalf of an Organisation	Great Dunmow Town Council			
ANON-QNH5-RD4S-S	Bill Critchley	Individual / member of the public				
ANON-QNH5-RD9A-C	Nick Dukes	On behalf of an Organisation	Littlebury Residents Group			
ANON-QNH5-RDZN-T	Fiona Martin	On behalf of an Organisation	Natural England			
ANON-QNH5-RDRD-8	n/a	On behalf of an Organisation	Little Easton Parish Council			
ANON-QNH5-RDRT-R	Tracy Coston	On behalf of an Organisation	Littlebury Parish Council			
ANON-QNH5-RDC4-9	margaret shaw	Individual / member of the public			Comments suggesting that topsoil should not be removed from development sites unless it is returned or used elsewhere	Whilst the statutory Biodiversity Net Gain metric does not specifically provide a tool for assessing soil characteristics of all sites, it places a strong emphasis on the retention, improvement and provision of distinctive habitats, including those with specific soil characteristics (e.g. peatland and acid grassland). There is no statutory framework by which the Council can require the retention and re-use of topsoil, but the Local Plan (paragraph 9.120) does stress the importance of reusing topsoil and subsoil within green infrastructure and landscaping, matching localised topsoil characteristics wherever possible. No modification is proposed.
ANON-QNH5-RDN3-K	Edward Gildea	On behalf of an Organisation	Uttlesford Green Party			

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RDWZ-3	David Corke	On behalf of an Organisation	Walden Countryside	Biodiversity Net Gain - Accessible Greenspace	Sets out importance of BNG to deliver accessible green space.	The Council recognises the importance of Biodiversity Net Gain (BNG), and the Local Plan sets an ambitious requirement for proposals to deliver a minimum of 20% BNG. The precise nature of the biodiversity improvements will vary on a case-by-case basis, but the Council also encourages proposals which create new accessible greenspace, in accordance with Core Policy 39.
ANON-QNH5-RD2N-J	Graham Knight	On behalf of an Organisation	Sawbridgeworth Swifts	Habitat creation - swift bricks	Request for additional reference in supporting text to British Standard for integrated nest boxes.	Whilst the Council welcomes the request for additional clarification and explanation of universal swift bricks, it is considered that the supporting text as drafted, with its cross reference to the Uttlesford Design Code (which in turn refers to guidance issued by Swift Conservation in 2022) offers flexibility to allow for a varied provision of nesting boxes and swift bricks within new developments. No modification is proposed to the supporting text or the Design Code.
ANON-QNH5-RD4G-D	Gavin Vicary	On behalf of an Organisation	North West Essex Swift Group			
ANON-QNH5-RDCJ-Y	Michael Priaux	On behalf of an Organisation	Swifts Local Network: Swifts & Planning Group			
ANON-QNH5-RD1W-T	Zhanine Smith	On behalf of an Organisation	Essex County Council	Supporting text - amendment	Essex County Council recommends that the reference to "Defra Metric" in paragraph 9.178 is replaced with "Statutory Biodiversity Metric"	The Council welcomes the recommendation to amend the supporting text and considers that the suggested modification would provide additional clarity and conformity with existing terminology.

Core Policy 41: Landscape Character

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RD4S-S	Bill Critchley	Individual / member of the public		Landscape change	Major developments by their nature will change the landscape.	The Council accepts that major development, particularly where it extends beyond the existing built-up area, is likely to result in some change to the landscape, but it does not consider all change to be negative or that all landscapes are unable to accommodate some change. Development, where sensitively designed to respond to its context, can enhance existing landscape character by reinforcing or framing valued features and restoring degraded elements of the landscape. The Council has undertaken a review of its Landscape Character Areas and a Landscape Sensitivity Assessment has been prepared for the proposed areas of growth to assess the proposed sites for any potential significance to landscape change. These results fed into the site selection methodology process and for those sites which are proposed for allocation the results of the studies have informed their site development frameworks. Core Policy 41 seeks to guide and manage future change to the landscape, and it clearly sets out that development proposals are expected to '... reflect and enhance local landscape character in accordance with the applicable guidelines to protect and conserve, manage and plan landscapes outlined for each landscape character area within the Uttlesford Landscape Character Assessment (2023), particularly in settlement edge locations and Rural Areas'.
ANON-QNH5-RDWU-X	Tara Lewis	On behalf of an Organisation	DLP Planning Ltd on behalf of Salacia Ltd	Landscape Visual Impact Assessment	<p>A developer considers CP41 unsound as it is not appropriately justified and inconsistent with National Planning Policy. They do not think it is reasonable to require all major development to submit a LVIA. They suggest this blanket approach does not allow for site-specific circumstances and is therefore unnecessarily onerous on applicants. As opposed to a full LVIA, there may be circumstances where a LVA may be appropriate. They therefore recommend deletion of this requirement.</p> <p>Should the reference be retained, footnote 151 requires updating to include the correct link to the definition of major development within the NPPF. The link cited refers you to a web page not found.</p>	The Council is satisfied that the threshold at which developments are required to undertake a LVIA is sound. The supporting text explains the landscape sensitivity around settlement edges and this justifies even smaller scale developments having an appropriate level of assessment. Consideration of the appropriate level of detail required in each LVIA or landscape report will be determined through the development management process on a case-by-case basis according to the type and scale of development proposed.

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RDN8-R	Great Dunmow Town Council	On behalf of an Organisation	Great Dunmow Town Council	Policy Application - Great Dunmow	Great Dunmow Town Council consider that the Great Dunmow allocations conflict with CP41.	The Council accepts that major development, particularly where it extends beyond the existing built-up area, is likely to result in some change to the landscape, but it does not consider all change to be negative or that all landscapes are unable to accommodate some change. Development, where sensitively designed to respond to its context, can enhance existing landscape character by reinforcing or framing valued features and restoring degraded elements of the landscape. The Council has undertaken a review of its Landscape Character Areas and a Landscape Sensitivity Assessment has been prepared for the proposed areas of growth to assess the proposed sites for any potential significance to landscape change. These results fed into the site selection methodology process and for those sites which are proposed for allocation, including those at Great Dunmow, the results of the studies have informed their site development frameworks. Core Policy 41 seeks to guide and manage future change to the landscape, and it clearly sets out that development proposals are expected to '... reflect and enhance local landscape character in accordance with the applicable guidelines to protect and conserve, manage and plan landscapes outlined for each landscape character area within the Uttlesford Landscape Character Assessment (2023), particularly in settlement edge locations and Rural Areas'.
ANON-QNH5-RDCT-9	Sophie Pain	On behalf of an Organisation	Pigeon	Policy wording - Valued landscapes	Two representations have been received from Pigeon stating that they are supportive of the need for new development to reflect and enhance local landscape character but considers the policy to be overly restrictive and has proposed a modification which provides greater flexibility. It is suggested that the reference to 'valued landscapes' and 'historic landscapes' is vague and lacks clarity, and that the criterion relating to the Open Countryside should be removed since development in the Open Countryside is already resisted through Core Policy 3. Proposed modifications also include removing reference to geological sites. Additional or alternative text is also offered.	Support is noted. The Council is satisfied that Core Policy 41 is sound and effective. Valued landscapes are defined by their physical attributes (so defined following the 'Stroud' Appeal decision in 2014). Historic landscapes are not specifically referred to in CP41 but '...the nature and physical appearance of ancient landscapes' and the 'historic significance of the landscapes' are. The plan should be read as a whole and in this case Core Policies 61 to 65, which provide further detail on heritage assets, their setting and landscape context, are of particular relevance. Landscape impact will be assessed through the development management process on a case-by-case basis, including the acceptability or otherwise of the proposal's impact on landscape character. It should be noted that Core Policy 3 seeks to limit most development in the Open Countryside (i.e. in areas which are not within or adjacent to the named settlements in the settlement hierarchy) but it does set out support for development adjacent to the larger settlements which would inevitably extend their built-up area into the rural landscape. Core Policy 41 supports this policy but provides additional clarification that where the settlements grow outwards, this should not be at the expense of the landscape character of the Open Countryside. On this basis, Council does not consider that the proposed removal of criterion i) is either justified or necessary.
ANON-QNH5-RDAU-8	Alex Cole	On behalf of an Organisation	Pigeon (Takeley) Ltd			
BHLF-QNH5-RDES-A	Andrew Marsh	On behalf of an Organisation	Historic England	Support	Historic England welcome the policy and specific reference to the historic environment within the landscape policy. Natural England is pleased that their suggested amendments to policy CP41 at Regulation 18 consultation have been incorporated into this version of the Local Plan. Great Dunmow Town Council strongly supports the principles of this Core Policy. Newport Parish Council support the policy, which is particularly relevant to Newport. Ashdon Neighbourhood Planning Steering Group support this policy as its a very important aspect in Ashdon.	Noted. The support for the policy as a whole and the specific reference to the historic environment is welcome.
ANON-QNH5-RDN8-R	Great Dunmow Town Council	On behalf of an Organisation	Great Dunmow Town Council			
ANON-QNH5-RDMM-C	Christine Griffin	On behalf of an Organisation	Newport Parish Council			

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RDZN-T	Fiona Martin	On behalf of an Organisation	Natural England			
ANON-QNH5-RD1U-R	Harriet Burrow	On behalf of an Organisation	Ashdon Neighbourhood Plan Steering Group			
ANON-QNH5-RDAX-B	Tom Vernon (Agent)	On behalf of an Organisation	Portland Capita	Policy Wording - Object	Portland Capital objects to the binary nature of the criteria proposed under draft Core Policy 41 stating it is too ambiguous and not effective. They consider it too subjective and would prevent development coming forward in the District and therefore hinder growth requirements. Clarification on scope for decision making is also required.	The criteria set out in the policy provide a framework for decision-making that will be informed by consideration of the Council's landscape evidence and, where required, a Landscape and Visual Impact Assessment. Landscape impact will vary by development type, scale and location, and it is important that the policy can be applied flexibly to all types of development. The Council is satisfied that Core Policy 41 is NPPF compliant and therefore sound and effective.

Core Policy 42: Pollution and Contamination

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RDN8-R	Great Dunmow Town Council	On behalf of an Organisation	Great Dunmow Town Council	Core Policy 42 - Support	Great Dunmow Town Council supports Core Policy 42 because it aligns with the NPPF policies.	Support noted
ANON-QNH5-RDH7-H	Robert Birss	Individual / member of the public		Heavy goods vehicle pollution in residential areas	Commercial properties should not be built in residential areas due potential increase in pollution from goods vehicles.	Core Policy 32 - The Movement and Management of Freight ensures requires inter alia that heavy goods vehicles should not have an unacceptable impact on residential areas.
ANON-QNH5-RDUP-Q	Loftus Buhagiar	Individual / member of the public		Enforcement of Pollution Mitigation Measures	The planning system ensures has a pivotal role in ensuring minimising pollution levels. Querying enforcement of mitigation measures at construction and completion stages.	In line with Core Policy 42 no development will be permitted (except in exceptional circumstances) where there is a potential risk to public health. Enforcement will be undertaken by the Planning Enforcement Team and the Environmental Team at both construction and completion stages.
ANON-QNH5-RD7U-X	Saffron Walden Town Council	On behalf of an Organisation	Saffron Walden Town Council	Provision of mitigation measures during development	Saffron Walden Town Council asserts that mitigation measures should be in place before the development.	Where necessary, the granting of planning permission will include conditions related to mitigation for pollution as a result of the proposed development, including specified requirements for the point at which such mitigation should be delivered. Core Policies 27 and 28 set out the Council's expectations with regard to active and sustainable travel, including car clubs and cycling routes.
ANON-QNH5-RD19-V	Giles Ward	On behalf of an Organisation	Environment Agency	Remediation of previously developed land	The Environment Agency welcomes the inclusion of recommended wording on the need to control pollution during construction and end use but do not consider the policy adequately addresses prioritisation of redevelopment of brownfield sites. They have recommended amending the policy text and future proofing the plan through a brownfield first strategy. They also suggest that the supporting text should include reference to water and ground as sources of pollution.	The Council agrees that the suggested modifications are helpful and will clarify the potential sources of contamination and provide a clearer framework for the remediation of contaminated brownfield land.

Core Policy 43: Air Quality

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RD7U-X	Saffron Walden Town Council	On behalf of an Organisation	Saffron Walden Town Council	Air Quality guidance	Core Policy 43 makes reference to the UDC Air Quality Technical Guidance 2018 and provides no indication of the timing of an revised version. Grammatical error in Paragraph 9.192 page 210 where the correct word is bisected not dissected.	The precise timing of a successor guidance document was not available at the time the Local Plan was prepared, although this is currently expected to be made available in 2025. The policy requires proposals to consider the most up-to-date guidance, and therefore when new guidance is issued this will be used when planning applications are considered through the development management process.
ANON-QNH5-RDAU-8	Alex Cole	On behalf of an Organisation	Pigeon (Takeley) Ltd	Core Policy 43 - clarification	The policy lacks clarity and precision and the replacement with if air pollution impacts lead	The Council agrees that the proposed amendment would help to clarify the policy intention.
ANON-QNH5-RDZN-T	Fiona Martin	On behalf of an Organisation	Natural England	Core Policy 43 - protected ecological sites	Core Policy 43 -Air Quality should include protected sites since employment and residential allocations within 200m can be adversely impacted the potential increase of Annual Average Daily Traffic (AADT) from the adjacent roads. Air quality assessments should be taken at Draft Local Plan stage and not at application stage. Natural England's report (NE001) should be followed in assessing road traffic emissions. Natural England requires that roads within 200m of protected sites should be modelled and assesses prior to inclusion of site allocations in the submission version of the Local Plan.	Core Policy 43 requires applicants to demonstrate that proposals have had regard to the most up-to-date air quality guidance. This 2018 Uttlesford guidance notes that air quality should be assessed where development has the potential for adverse pollution impacts on sensitive receptors including designated ecological sites. However, the council agrees that including a specific reference to protected sites would add further clarity to the policy.
ANON-QNH5-RDN8-R	Great Dunmow Town Council	On behalf of an Organisation	Great Dunmow Town Council	Core Policy 43 Support	Great Dunmow Town Council is supportive of the policy and notes its accordance with the NPPF.	Support noted.

Core Policy 44: Noise

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
ANON-QNH5-RD4X-X	Sally Taylor	On behalf of an Organisation	Birchanger Parish Council	Aircraft noise	Birchanger Parish Council notes the proposals to increase operational hours and capacity at Stansted Airport and the detrimental impact of aircraft noise on local residents. The comment expresses concern that housebuilding proposals will result in more people being exposed to noise from flights and airport operations.	The Council recognises that aircraft movements are a major source of noise in the District. Core policy 44 is designed to ensure that development does not expose users of noise sensitive uses to unacceptable levels of noise. This includes a specific threshold at which aircraft noise is to be considered unacceptable, as well as requirements for proposals involving noise sensitive developments to limit the exposure of users or residents to existing, temporary or future sources of noise. The Council will continue to work with Stansted Airport to ensure that it follows and regularly reviews its Noise Action Plan.
ANON-QNH5-RD97-2	Lydia Sadler	On behalf of an Organisation	Stansted Airport Limited	Core Policy 44 - Stansted Airport	Stansted Airport Limited (STAL) seeks a correction to the supporting text Paragraph 9.198 which clarifies the process of identifying noise contours. STAL also suggests that the policy as currently drafted is not in accordance with the measures used in the Noise Policy Statement for England, and that the policy's reference to SOAEL from aviation does not reflect the 2023 Secretary of State decision on Luton Airport.	The Council agrees that the suggested change to Paragraph 9.198 would increase the factual accuracy of the supporting text and will propose a modification as recommended. As set out in the policy, the Unacceptable Adverse Effect will be determined on a case-by-case basis, and the policy as worded provides for a discretionary approach to the consideration of noise impact at the individual proposal level. This is in accordance with the noise hierarchy set out in the Noise PPG which states that development should be prevented where noise is considered to have an unacceptable adverse effect. Core Policy 44 as currently drafted does reflect the SOAEL which was established through the 2023 Luton Airport decision, and a footnote is provided which links to that decision. However, the Council considers that the additional reference to the LOAEL would be helpful and will propose a modification to incorporate this into the policy.
ANON-QNH5-RD7U-X	Saffron Walden Town Council	On behalf of an Organisation	Saffron Walden Town Council	Core Policy 44 - Stansted Airport Noise Action Plan	Saffron Walden Town Council seeks a modification to the supporting text Paragraph 9.196 to correct the period of the current London Stansted Noise Action Plan and to include a reference to successor documents.	The Council will consider through the examination in public whether a modification to the supporting text would be helpful in relation to the most recent noise action plan and its successor documents.
ANON-QNH5-RDN8-R	Great Dunmow	On behalf of an Organisation	Great Dunmow Town Council	Core Policy 44 - Support	Great Dunmow Town Council is supportive of the policy and notes its accordance with the NPPF and policies in the Great Dunmow Neighbourhood Plan.	Support Noted

Consultee ID	Full Name	Organisation /Individual	Organisation	Comment Category	Comment Summary	Officer Response
	w Town Council					
ANON-QNH5-RDMM-C	Christine Griffin	On behalf of an Organisation	Newport Parish Council	Core Policy 44 - Transport noise	Newport Parish Council is supportive of the policy but notes the noise impact of the elevated section of the M11 Motorway and railway line on the development of the settlement as evidenced by a DEFRA Noise Contour.	The Council notes the support for Core Policy 44, as well as the concerns on noise from the M11 motorway and railway line. The Parish Council is encouraged to consider the potential impact of transport noise on new residents when selecting sites for allocation in the Neighbourhood Plan to address the housing requirement set out in the Local Plan.
ANON-QNH5-RDUP-Q	Loftus Buhagiar	Individual / member of the public		Noise - planning conditions	A respondent has requested more information on the planning conditions that will be sought to deal with noise and public health.	Core Policy 44 sets out the criteria against which proposals for noise-sensitive and noise-generating development will be assessed. Where necessary, the Council will seek planning conditions to mitigate the potential impacts on noise on existing and future occupiers. This will be determined on a case-by-case basis through the development management process.
ANON-QNH5-RD1W-T	Zhanine Smith	On behalf of an Organisation	Essex County Council	Stansted Airport Noise	Education should be included in the Policy as a sensitive use and the noise level provided for outdoor noise on school sites is that it should not exceed 55db LAeq (30 min).	The Council agrees that an additional reference to specific noise exposure limits for educational uses would add clarity to the policy and will propose a modification as suggested by ECC.
ANON-QNH5-RDRS-Q	Richard Agnew	On behalf of an Organisation	Gladman Developments Ltd	Stansted Airport Noise	Specific thresholds in the Policy should be robustly justified by reference to evidence and /or national policy and guidance. Suggested that a Stansted noise assessment report is undertaken to better understand areas falling within the Lowest Observed Adverse Effect Level and the Significant Observed Adverse Effect Level. The proposed report would provide a better understanding of the severity of noise constraints and areas initially deemed as unacceptable due to airport noise. Suggestion to reword Policy so that it aligns with National Policy and Guidance whereby development in at Significant Observed Adverse Effect Level may be permitted taking into account design and acoustic mitigation measures.	Core Policy 44 includes a clear reference to the source of the aviation noise SOAEL, and the Council is proposing an additional modification to add the aviation LOAEL as well as additional reference to levels for educational uses based on ECC guidance. Beyond this, the policy does not include any other specific thresholds, and consideration of noise impacts will be on a case-by-case basis through the development management process. This will include consideration of the findings of the Noise Impact Assessment and any mitigation proposed.