

Uttlesford Local Plan 2021-2041

Regulation 19 Consultation Report and Appendices

December 2024

Executive Summary

This Statement provides a summary of the consultation undertaken on Uttlesford District Council's Draft Local Plan 2021- 2041 to demonstrate compliance with Regulation 22 (1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The Statement details the consultation stages undertaken on the Draft Local Plan 2021-2041, as follows:

- Public Consultation on Draft Plan (Regulation 18) October – December 2023
- Public Consultation on Publication Plan (Regulation 19) August – October 2024

Both consultations were undertaken in accordance with Regulation 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

This Statement explains the consultation process undertaken on the Publication Plan, including the methods used, the people involved, and the number of representations received. This Statement also sets out a summary of the main issues that have arisen through the Plan's production, and how this has influenced the Publication Version of the plan.

Introduction

1. This statement has been produced to provide a summary of the consultation processes for the Local Plan 2021-41 and the main issues arising. This statement has been produced in accordance with Regulations 22 (3)(a)(iv) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (“the Regulations”):

(3) As soon as reasonably practicable after a local planning authority submit a local plan to the Secretary of State they must:

(iv) a statement of the fact that the documents referred to in sub-paragraphs (i) to (iii) are available for inspection and of the places and times at which they can be inspected:

- (i) which bodies and persons the local planning authority invited to make representations under regulation 18*
- (ii) how those bodies and persons were invited to make representations under regulation 18*
- (iii) a summary of the main issues raised by the representations made pursuant to regulation 18,*

2. This statement explains each of the consultation stages of the Local Plan in relation to the methods used, the people involved, and the number of representations received. This Statement also sets out a summary of the main issues arisen through the regulation 19 stages of consultation and how these have influenced the proposed modifications that will be submitted alongside the Regulation 19 Local Plan to the Secretary of State.
3. A Regulation 18 Consultation Statement¹ was published to address the regulatory test outlined above.
4. Part 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012 also requires Local Planning Authorities to:

“(b) ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation [18\(1\)](#).”

¹ Regulation 18 Consultation Statement available here: [Regulation 18 Consultation Report - Uttlesford District Council](#)

5. This report addresses the requirement set out in Part 19 of the Regulations by producing a statement of representations received.

Background

6. The new local plan will set out the overall development strategy and policies to guide development in the district up to 2041. It will include strategic policies as well as non-strategic policies, housing allocations, employment allocations and other associated infrastructure development. The Uttlesford Local Plan 2021-2041 will replace the current Local Plan adopted in 2005.
7. The adopted Development Plan comprises various documents listed below in Table 1, including Development Plan Documents (DPD's) and Neighbourhood Plans, along with documents prepared by Essex County Council. **Table 1** shows which of the adopted documents are being reviewed and replaced by the new Local Plan.
8. Uttlesford has recently adopted a design code, which aims to provide a practical and useable guide involved in the design and planning of development as an SPD to the 2005 Local Plan. Once the new Local Plan has been adopted this will be under review to ensure consistency.

Table 1: Adopted Development Plan Documents

Name of DPD	Geographical area	Adoption Date	Currently under review
Saved policies of the Uttlesford Local Plan 2005	Administrative area for Uttlesford	2005	To be replaced by the Uttlesford Local Plan (2021 – 2041).
Essex Minerals Plan 2014 (DPD)	Administrative area for Essex	2014	Yes – the plan period has been proposed to be extended to 2040 (new plan period 2025 -2040) to take account of the tests of soundness for new plans in national policy. Regulation 18 consultation took place between the May and July 2024.

Name of DPD	Geographical area	Adoption Date	Currently under review
Essex and Southend-on-Sea Waste Local Plan 2017 (DPD)	Administrative Area for Essex and Southend – on - Sea	2017	No – Last checked for consistency with national policy in October 2021. Essex Waste Strategy to inform approach for next Waste Local Plan.
Uttlesford Design Code	Administrative area for Uttlesford	2024	No – will be reviewed once the new Local Plan is adopted
Ashdon Neighbourhood Plan	Ashdon Parish	2022	No
Felsted Neighbourhood Plan	Felsted Parish	2020	A review is being undertaken.
Great and Little Chesterford Neighbourhood Plan	Great and Little Chesterford Parishes	2023	No
Great Dunmow Neighbourhood Plan	Great Dunmow Parish	2016	No
Newport, Quendon & Rickling Neighbourhood Plan	Newport, Quendon & Rickling Parishes	2021	A review is being undertaken.
Saffron Walden Neighbourhood Plan	Saffron Walden Town Council	2022	No
Stebbing Neighbourhood Plan	Stebbing Parish	2022	No

Name of DPD	Geographical area	Adoption Date	Currently under review
Thaxted Neighbourhood Plan	Thaxted Parish	2019	A review is being undertaken.

Local Development Scheme

9. The Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011) requires local planning authorities to prepare, maintain and publish a Local Development Scheme (LDS).
10. The LDS² sets out the timetable for producing the Development Plan Documents, including key production and public consultation stages. It must be made available publicly and be kept up to date. This enables the community, businesses, developers, infrastructure providers and other interested parties to know how they can participate in their preparation.
11. The Council's current LDS (January 2024) updates the previous LDS published in October 2020 and updated in October 2023, with a further minor revision in January 2024. It provides information about the Development Plans and other Planning Policy documents the Council plans to prepare.
12. The Public Consultation on the draft Local Plan (Regulation 18) took place between October and November 2023 and the public consultation on the Publication Version of the Local Plan (Regulation 19) took place between August and October 2024. The Local Development Scheme states that the plan is due to be submitted to the Secretary of State (Regulation 22) in December 2024, examined in Public (Regulation 24) in 2025, and adopted in the second quarter of 2026.

Consultation Process

13. In accordance with the LDS, various consultations have taken place during the preparation period of the Local Plan. These include an Issues and Options consultation in November 2020 to April 2021 that considered key issues, and then the Regulation 18 consultation on a draft Local Plan and the Publication Version of the Local Plan (Regulation 19) consultation, as described above. All Local Plan Consultations were undertaken for at least 6-weeks as demonstrated below.

² Uttlesford (2023) Local Development Scheme. Available online: <https://www.uttlesford.gov.uk/local-plan-timetable>

Consultation	Issues and Options (2021)	Regulation 18 (2023)	Regulation 19 (2024)
Dates	November 2020 – April 2021	3 rd November 2023 – 18 th December 2023	8 th August 2024 – 14 th October 2024

Issues and Options

14. The first consultation was the ‘Issues and Options’ stage which ran from November 2020 to April 2021. This stage took place before any proposals had been developed and asked respondents to consider key issues they would like to be covered in the new local plan.
15. The Council prepared consultation documents which were uploaded to a consultation portal. These were split into nine key themes including; where you live, character and heritage, climate change, transport, leisure, culture and healthy lifestyles, biodiversity, local economy, homes, and creating new places and communities.
16. All comments received were grouped by theme, analysed, and then used to inform the Council’s work on a draft version of the Local Plan and draft policies.

Regulation 18 Consultation

17. The Regulation 18 draft plan was published in November 2023, alongside a series of evidence base documents that informed it. The consultation took place between the 3rd of November and the 18th of December.
18. The Council consulted on this draft plan using numerous consultation methods such as public meetings, exhibitions, and social media posts. The council received over 5000 comments which all helped inform the regulation 19 version of the Local Plan.
19. All comments were then assigned ‘categories’ and summarised in a report made available as part of the Regulation 19 consultation³. This demonstrated how the council has considered the consultation responses in line with the regulations.

³ UDC (2024) Regulation 19 Consultation. Available Online: <https://www.uttlesford.gov.uk/reg-19-consultation>

Regulation 19 Consultation

20. The publication version of the plan was published on the 8th of August 2024, alongside a series of evidence base documents that were considered when drafting the Publication version of the Plan.
21. The publication consultation took place between the 8th of August and the 14th of October 2024. The consultation took place for 9 weeks rather than 6, to take account of the Summer Holidays.
22. To ensure proper engagement takes place in accordance with the regulations, numerous consultation techniques were used, including public meetings, exhibitions, social media posts and newspaper notices, these are all explained in more detail below.

E Newsletters

23. The Regulation 19 Consultation featured multiple times in the Local Plan newsletter (11th June 2024, 8th July 2024, 31st July 2024, 8th August 2024, 29th August 2024, 30th August 2024). These were sent to 9134 Recipients, with a 28% open rate.

News releases & local newspaper coverage

24. There were multiple press releases on the run up and during the regulation 19 consultation these are available to view in [Appendix 1](#). These gained coverage in the Saffron Walden Reporter, Walden Local and Bishops Stortford Independent. Adverts for the Local Plan ([Appendix 2](#)) were also put in the Saffron Walden Reporter, Walden Local, Dunmow Broadcaster and Bishops Stortford Independent.

Parish Events

25. Two parish events took place to inform Parish Councils about the implications of the Local plan on their area. They were also provided a 'parish pack' which included a copy of the Local Plan, relevant appendices and a copy of the short guide which summarised the plan⁴. At this event Parish Council representatives were given a presentation on the Local Plan content, and they were given an opportunity to ask officers questions. This event actively encouraged parish council representatives to promote the plan and inform residents in their area about it. These events took place on:
 - 15th August 2024, Takeley Community Centre
 - 19th August 2024, Uttlesford District Council Offices.

⁴ Available to view here: [Local Plan \(Regulation 19\) consultation - Uttlesford District Council](#)

26. Forty two Parish Councils indicated their attendance to the events, with the rest who couldn't attend being sent their parish packs by post.

Social media

27. There was a total of 26 Social media posts over various platforms (X, Facebook and Instagram). They had an overall reach to 22528 people and had 1710 people engage with them. These posts took place before and during the consultation to promote and provide information about the events and how to respond.

Drop-in Exhibitions

28. Four drop -in exhibitions were held across the district, which were promoted through social media, the newsletter, parish events and the short guide. These took place to ensure that residents and businesses could find out more about proposals in the Publication Local Plan. The events were supported by District Councillors and Planning Officers.

29. These were held on:

- Monday 2nd September 2024, Ugley Village Hall
- Wednesday 4th September 2024, Foakes Hall, Great Dunmow
- Monday 9th September 2024, Saffron Walden Town Hall
- Tuesday 10th September 2024, Priors Green Community Hall, Takeley

30. The events provided the public with Information through display boards, maps, copies of the plan and supporting documents, all of these can be viewed online⁵. Officers at the event were available to discuss details of the plan and answer any questions relating to the content.

Local Plan Panel

31. In addition to the three main consultation stages and ongoing engagement with key stakeholders through the Duty to Cooperate, the Council also formed the Local Plan Panel (LPP). This is a cross-party working group of the Cabinet that has provided regular scrutiny to the Local Plan process and was able to make recommendations to Cabinet, although it is not a decision-making body. The LPP is a successor body to the Local Plan Leadership Group (LPLG) which stood between 2020 and 2023.

32. The function of the LPP is:

- to assist the Council in the preparation of a local plan which meets the agreed development needs of the district during the plan period in the most appropriate manner

⁵ <https://www.uttlesford.gov.uk/reg-19-events>

- to make recommendations to Cabinet as to the preparation of the draft Uttlesford Local Plan 2021 - 2041, and related planning policy documents.
- to enable members of the public to address the LPP for a maximum of 4 minutes and to provide a copy of their statement, subject to having registered to speak in advance, and
- to enable councillors from Uttlesford District Council and Town and Parish Councils to address the Group for a maximum of 5 minutes each and to provide a copy of their statement, subject to having registered to speak in advance.

33. The LPP met regularly to inform the Regulation 19 Plan, this included the meeting on the 15th July 2024, where they recommended the Local Plan to be considered by cabinet and Full Council for consideration. Full Council agreed (ADD DATE) for the Publication Version of the Local Plan to be published for the Regulation 19 Publication and for Submission to the Secretary of State.

Regulation 19 Consultation Processing

34. The Council received over 2000 consultation responses, made by 515 consultees, either through the Council's web-based consultation portal 'Citizen Space' or via email or letter. These were then processed and allocated to the relevant policy, chapter, or evidence base study on our database. As the consultation related to matters of Soundness, Duty to Cooperate and Legal Compliance; the form was tailored so respondents could indicate whether they thought each policy complied with these. Officers processing these comments would be able to see all this information when drafting an officer response, these are available in Appendices 3 of this Report.

35. The comments were assigned 'categories' to aid processing, for example comments relating to a proposed site allocation might have categories relating to 'highway issues,' 'flooding,' etc. The comments were then processed with summaries of what the comments have said about the issue and officer responses, highlighting the Council's position on these matters prepared for each individual category. These officer responses have also helped to inform the Proposed Modifications, the Council have included in their Submission pack of documents. These are designed to assist the Inspectors with their deliberations.

36. If a comment was inputted into the system and it articulated multiple points, the comment was split into its individual parts and each part of the comment was put with other comments talking about the same issue. Then an officer response to that issue was added to the table. A copy of these summaries and officer responses can be found in tables in [Appendix 3](#). This was used by the Council to inform the process of reporting on the comments received, all original representations will also be published and available to the inspector to view in full.

37. Due to the number of comments received, this section of the report focuses on the key stakeholders, the policies that received the most responses and the Key Planning Issues. This includes:

- Core Policy 1: Addressing Climate Change
- Core Policy 2: Meeting our Housing Needs
- Core Policy 3: Settlement Hierarchy
- Core Policy 4: Meeting Business and Employment Needs
- Core Policy 6: North Uttlesford Area Strategy
- Core Policy 10: South Area Strategy
- Core Policy 12: Countryside Protection Zone
- Core Policy 16: Stansted Mountfitchet and Elsenham Area Strategy
- Core Policy 19: Rural Area Housing Requirement Figures
- Core Policy 40: Biodiversity
- Core Policy 56: Affordable Dwellings

38. It is important to note that this section only seeks to provide a high-level summary of the comments made. The Council's responses to the consultation comments can be found in Appendix 3 to this report in relation to each individual issue raised. Appendix 3 also provide a full summary of all issues.

Statutory Consultees

Essex County Council

39. Essex County Council (ECC) provide broad support for the Regulation 19 Plan and acknowledge the changes made since the Regulation 19 consultation. In particular, ECC support the inclusion and strong emphasis on climate change from the outset, and for incorporating the Essex Net Zero policy approach within the plan.

40. However, they have suggested some additional modifications to the Regulation 19 Plan along with some outstanding issues that ECC would like to see addressed.

41. In ECC's role as lead authority for education, the first point is ensuring education matters are addressed and appropriately referenced in the policy, including early years and childcare. ECC have requested further evidence to accurately reflect proposals at Saffron Walden County High School.

42. Further transport evidence is sought to clearly demonstrate the measures to support sustainable and active travel for specific site allocations are deliverable and viable. ECC would like to see more information on Great Chesterford Research Park, Great Dunmow (Church End area) and Stansted Mountfitchet. They also believe further consideration should be given to the

transport modelling and site constraints to reflect site allocations at Elsenham and those proposed for neighbourhood plans (Newport and the defined Larger Villages).

43. Finally, ECC have requested that the Infrastructure Delivery Plan (IDP) is updated to reflect the suggested changes in the Plan.

Council Response:

44. The Council is grateful for the support of ECC who have commented on each draft of the Local Plan, prior to publication at Reg 18 and Reg 19 stages and where IDC sought to incorporate the majority of their comments. It is understood there is a high degree of agreement between UDC and ECC. ECC have identified some further comments at the Reg 19 stage, but the majority of these are very minor in nature and would fall comfortably within the 'additional' modifications category. UDC have sought to include a large number of these proposals within their 'proposed' modifications that accompany the plan submission, but there is assumed to be plenty of time to refine these before they are finalised and published for consultation later in 2025 as part of the Examination process. It is not thought there are any significant issues outstanding.

Environment Agency

45. The Environment Agency (EA) have reviewed the Local Plan, as well as the Strategic Flood Risk Assessment (SFRA), Water Cycle Study and site allocations.
46. The EA believe that insufficient evidence has been provided to show that the flood risk sequential test has been applied to the proposed site allocations and therefore does not comply with the National Planning Policy Framework (NPPF). The EA have requested that further evidence is submitted demonstrating how the sequential test has been applied.
47. In relation to the Water Cycle Study, the EA state that the general conclusions and recommendations from the Regulation 18 consultation appear to have been taken into account.
48. The EA are supportive of the fact that Core Policy 34 recognises the need for sufficient off-site water and sewage service infrastructure to be in place to accommodate development, and the inclusion of phasing conditions.
49. The EA would like the wording of Core Policy 42 to be strengthened further to address their comments with regards to prioritising the redevelopment of brownfield sites.
50. While the EA appreciate additions to Core Policy 37 to include reference to infiltration drainage, in relation to Core Policies 35 and 36, the EA have requested some further amendments to these policies.

Council Response:

51. The Council has considered the EA's additional recommendations for amendments to the core policies and will submit modifications to the Inspector(s) for consideration along with the Local Plan.
52. The issue with regard to the sequential test principally relates to the inclusion of land within Flood Zones 2 and 3 within the strategic allocation at Great Dunmow. No development is proposed within the areas at risk of flooding, but the land has been included to allow for the delivery of green infrastructure and potentially the incorporation of natural flood management to alleviate existing flooding issues. Thus, the inclusion of this land, for sequential test purposes, would hinder the Council's ability to deliver environmental enhancement. Elsewhere, the Strategic Flood Risk Assessment has demonstrated that there is a low risk of flooding, albeit with some very small areas of surface flooding within sites that can be managed through the use of SuDS.

Natural England

53. Natural England (NE) are supportive of the Regulation 19 Plan, in particular policies on green and blue infrastructure (GI) and sustainable urban drainage systems, sites designated for biodiversity or geology, water issues (flood risk, water quality and quantity, watercourse protection and enhancement) and biodiversity net gain. They have suggested some minor modifications throughout the Plan and to the evidence base.
54. NE welcomes the acknowledgement of the importance of Hatfield Forest National Nature Reserve (NNR) and Site of Special Scientific Interest (SSSI), and the recreational pressures that Hatfield Forest is currently experiencing. However, they believe that further mitigation measures need to be embedded in Core Policy 10 in order for the policy to be effective. They raise particular concerns over the potential air quality impacts of the Land North of Taylors Farm employment allocation on the SSSI.
55. In relation to site allocations, NE would like to update the policy wording requiring applicants to engage with NE at the pre-application stage to assist with detailed design of the SANG, ensuring it is in line with NE's SANG Guidelines.

Councils Response:

56. The Council has considered NE's suggested amendments to the Local Plan and will submit modifications to the Inspector(s) for consideration to address the majority of issues raised. With regard to the air quality impact of the employment allocation at Takeley Street, even though the Council are satisfied this would be best addressed through the Development Management process the Council and NE have agreed to review the outputs of the air quality assessment

which is already being prepared as part of the Environmental Impact Assessment for proposed development of this site. The results of the modelling are expected in early 2025.

Historic England

57. Historic England (HE) support the inclusion of Core Policy 39, and the inclusion of Core Policy 41 specifically in relation to their references to the historic environment, as well as changes made to Core Policy 51. HE also welcomes the inclusion of Core Policies 61, 62 and 63 in the Plan.
58. Clarifications have been requested by HE around Core Policy 64, with concerns raised that the policy is not consistent with the NPPF where it addresses harm to designated and non-designated heritage assets.
59. HE have requested a new Core Policy is created addressing applications that affect Registered Parks and Gardens and non-designated historic parks and gardens.
60. In relation to allocations, HE welcomes the consideration of the immediate surroundings of the scheduled monument 'Warish Hall moated site and remains of Takeley Priory', however HE have concerns that development in the northern part of this Site would create harm to the assets setting. Therefore, HE have suggested a more sympathetic arrangement for the Site is considered, shifting development further south along Stortford Road.
61. HE have raised concerns about the principle of developing sites A to C in Great Dunmow due to the potential harm this could cause to the openness and rural character and have requested that 3B is not allocated as potential harm could not be adequately mitigated through design.

Council Response:

62. The Council have engaged with Historic England following the Regulation 19 Consultation to discuss the potential for modifications to the Local Plan that can alleviate their concerns in relation to the Takeley and Great Dunmow site allocations, as well as to Core Policy 64. This collaboration is reflected within an addendum to the previously agreed Statement of Common Ground, which notes both parties' commitment to seeking to resolve these matters through the examination process.

MAG – London Stansted Airport

63. Stansted Airport Limited (STAL) welcomes the Council's intention to positively plan and identify land for future housing and employment. STAL are working with the Council and preparing a Statement of Common Ground, however they have identified a few key issues, as follows.

64. STAL continue to believe the Local Plan should provide a better recognition of the role the airport plays in the local and regional economy.
65. They believe Core Policy 11 should be amended to ensure technical accuracy, reflect best practice and to refer to the airport's current and approved future noise contours. STAL also consider that the Plan should include a dedicated Aerodrome Safeguarding Policy, rather than being included in Core Policy 11.
66. The airport should be identified on the list of 'existing employment sites' set out in Appendix 14.
67. Specific amendments are requested to the Airport Policy Plan to show the Operational Area boundary, remove references to Ancillary Airport Uses and Existing Employment Sites and identify solely 'Stansted Airport - Airport' uses within the boundary. Whilst STAL support the principle of the CPZ, they are seeking amendments to the proposed boundary at the airport in order to reflect the Airport Operational Area.
68. STAL continue to have concerns over the impact of the proposed Takeley-to-Airport active travel route upon the efficient operation of the airport's roads, cycle/pedestrian safety, deliverability, the unintended consequence of encouraging fly-parking in Takeley, and its value for money relative to the number of prospective users compared to alternative use of developer contributions (such as more frequent buses). They also consider that any improvements to the airport public transport interchange that derive from its use by new or more frequent local bus routes from new housing areas should be explicitly funded by developer contributions and be reflected in the Council's Infrastructure Delivery Plan.
69. STAL support the inclusion of a car parking policy within Core Policy 11, however, the policy should be amended to be clearer regarding the approach to off-airport car parking.
70. STAL welcome the removal of the proposed Thaxted housing allocations.
71. While STAL are supportive of biodiversity net gain and adapting to climate change, this must be done in a sustainable, equitable and financially-viable manner. We continue to have concerns around the strength of evidence supporting the Plan's requirement for 20% BNG for non-residential developments as opposed to the 10% requirement set by national legislation.

Council Response:

72. The majority of issues raised by STAL are considered able to be resolved through minor amendments to policy text, supporting text and policies map boundaries which will be subject to further discussion during the DtC and Examination processes. London Stansted Airport is a key regional asset that the Council will support through Core Policy 11 and district-wide housing and employment growth via the spatial strategy.

73. The Council has worked collaboratively with STAL during the plan-making process, as evidenced by the SoCG, and is committed to resolving outstanding issues during both the DtC and the examination processes. The Council believes that the allocations, public transport and active travel improvements in the South Uttlesford Area Strategy are deliverable and will engage positively and proactively with STAL and other stakeholders to ensure this.

Key Core Policies

Core Policy 1: Addressing Climate Change

74. The majority of comments strongly support the high priority given to climate change in the Local Plan, in particular the setting of high standards for new building design. One comment does question how new completions and know commitments will meet the higher efficiency standards set out in the Local Plan.

75. Two developers have suggested Core Policy 1 should be re-worded to include aspirational wording around achieving net zero, which would allow greater flexibility and minimise impact on the delivery of development.

Council Response:

76. The Council are satisfied that Core Policy 1 addresses the climate emergency and will support the Council's transition to net zero by 2030.

77. The Council invites respondents to read this policy in combination with Core Policies 22, 23, 24 and 25 set out in Chapter 9 which support Core Policy 1. As requested by Anglican Water, the Council will include reference to Core Policy 37 and sustainable urban drainage systems within Core Policy 1.

Core Policy 2: Meeting our Housing Needs

78. There were a significant number of comments in relation to the spatial strategy. Most comments tended to be commenting on the general housing requirement for the district. Some comments expressed support for the identified housing requirement, while others criticised it because the figure does not take account of updated housing requirements of 749 rather than 675 per year. They state that this makes the Plan unsound.

79. Other comments criticise the buffer set out in the policy and suggest that the plan should contain a 10 to 15% buffer rather than just 9%. They point to the fact that the council has struggled to maintain a 5-year housing land supply over the last few years and the poor delivery rate against the Housing Delivery Test. They also cite that it is unacceptable to be leaving a such high level of housing to Neighbourhood Plans and that too much housing is located on strategic sites that have been subject to dismissed appeals. It is also suggested that the housing

requirement figure should be 13,680 not 13,500. They state that this is because market signals indicate under provision, which are said to indicate a lack of housing supply and against the Housing Delivery Test being 55%.

80. One comment also suggests that Stansted Airport is a nationally recognised strategic infrastructure project and that due to factors such as Chesterford Research Park expansion and the influence of Cambridge, the Housing figure should be even higher.
81. A few comments also question the lack of housing allocated in the green belt, and consequently, local housing cannot be met. It is also suggested that this is contrary to emerging Green Belt policy heralded in the Written Ministerial Statement in July 2024.
82. Several general comments have been made about the spatial strategy as a whole, these being some positive ones from parish councils and others commend the principle of the council bringing forward an up-to-date plan to replace the 2005 one. A few comments do question the lack of an allocation at Great Chesterford, citing that it is a sustainable location, and it is more sustainable than Takeley.
83. There are also comments that question the balance in allocations between Great Dunmow, Stansted Mountfitchet and Saffron Walden. They suggest that there are too many homes in Great Dunmow and that more sites should be sought in the other 2 Key settlements to balance this. Other comments suggest, rather than allocating extra housing at Great Dunmow, allocating at smaller villages would be a preferable option.
84. Various state that the spatial strategy cannot be considered sound without the assessment for new communities. They highlight the lack of evidence to meet the housing need through housing in existing settlement and that planning for a new community would mitigate the need to add housing to existing settlements, without the existing infrastructure to support them.
85. As well as comments to the spatial strategy as a whole there were specific comments, which relate to specific settlement allocations within the spatial strategy. Firstly a few comments regarding Newport state that the development potential of the Settlement is overstated. There are also some comments that suggest the clarification of Newport as a Local Rural Centre, means it should be provided with a strategic allocation to ensure that it grows in the most sustainable manner. They say that the existing approach to planning is overly restrictive. A lot of comments related to Henham specifically, they pointed to the fact that the settlement received an allocation based on settlement limits rather than parish boundaries and that (similarly to comments on CP3) this is unsound as it was not discussed at LPP or cabinet meetings.
86. There were questions also surrounding the allocation of 110 dwellings at Elsenham, citing that this was highly irregular, and it is said that there is to be no published justification on education grounds. They query how the development would be able to be integrated with the surrounding environment and that it was not included in the regulation eighteen consultation meaning that no comments had previously been made about it.

Council Response:

87. The Council is satisfied that it is meeting the correct housing need in full and with a 9 % buffer to provide for greater flexibility and contingency. At the time the plan was being prepared, the identified housing need was 13,500 homes. Much later in the process, a draft version of the NPPF was published that indicated this should be 14,980, but where an emerging plan was within 200 of the annual increase (in Uttlesford the annual increase was 74) the plan should proceed under transitional arrangements providing it had already reached the Reg 19 stage.
88. The final version of the new NPPF was published on 12th December 2024 that has increased the housing requirement for Uttlesford to 16,080, but the revised transitional arrangements make clear that where plans make provision for at least 80 % of this requirement, the plans should proceed under transitional arrangements providing they reach the Reg 19 stage by the end of March 2025. If Uttlesford were only planning for 13,500 this would be 84 % of the new housing requirement and so Uttlesford should proceed on the basis of the transitional arrangements. In actual fact, Uttlesford are planning for 14,741 dwellings which is over 90% of the new requirement. In either case, Uttlesford commenced the Reg 19 stage in August 2024, which is also well before the deadline set out in the new NPPF.

Core Policy 3: Settlement Hierarchy

89. Most comments were in relation to the allocation of settlements in the Settlement Hierarchy. Around two hundred comments were in relation to the allocation of Henham within this hierarchy. Some comments talked about the policy as being sound, but some raise concerns about the policy in general, saying that the strategy for growth does not accord with the Settlement Hierarchy. They also highlight that growth should be apportioned in Smaller Villages to allow them to expand. Various comments also make suggestions for improving the how the facilities scoring was carried out with suggestions for how it could be amended.
90. The main thrust of the objections to this policy were in relation to Henham. They cite that the changes between regulation 18 and 19 were unfair and have not taken account of the two hundred homes already met by Bloor Homes within the parish boundaries of Henham. They suggest that this was not sufficiently examined or debated, therefore it is considered unsound. The main concern is the fact that the consideration is now settlement based, rather than Parish based therefore Henham has been allocated a substantially higher figure. They cite a concern for housing at both Henham and Elsenham. Reference is made to the fact though that additional housing approved in Henham should reduce the housing figures for the village. Also, they cite that Henham has few Local Facilities and credible transport connections and an overstretched school and medical facilities. Overall, a more credible balance for the village is sought.
91. Henham Parish Council responded to the plan; they cite that the distribution of larger villages allocation numbers in general does not reflect the real capacity of different villages to absorb

development. They also cite an appeal that was not allowed on sustainability grounds in the village. Without prejudice to the concerns raised by the Parish Council, they do commit to a Neighbourhood planning process for decisions about locations for, non-strategic allocations.

92. Other comments raised concerns about the classification of Takeley as a Larger Village. They note that Takeley is cited in the plan as a village, larger village or small town but in reality, they say, it is a cluster of smaller hamlets such as Smiths Green and Bambers Lane. Another respondent also states that it is in fact two villages, Takeley and Priors Green. Comments also question how, without a high street, health facilities, no fire station, no cultural outlets and little, if none no youth services or entertainment sites, whether it can be considered a sustainable location. It is stated that a classification of 'Key Settlement' would be more appropriate, to ensure that Infrastructure associated with the Strategic Development in Takeley would be more appropriate.
93. Some comments also questioned the Settlement allocation on the hierarchy in relation to Debden and state that the village score should be thirty-nine rather than 44 making it a Smaller Village. Some comments do support the categorisation of Settlements within the Hierarchy, these being Great Dunmow, Great Chesterford, Flitch Green, Littlebury Saffron Walden, Stansted, Thaxted and Newport.

Council Response:

94. The Council are satisfied the Spatial Strategy provides an effective and appropriate way to plan for the future of Uttlesford. The majority of growth is directed towards the largest and most sustainable settlements, with a proportionate amount directed to the Larger Villages and then only modest infill to the Smaller Villages. There is a good range of sites of different size, type and geography with roughly one third of allocations on sites over 1,000 units, another third on sites of between 500 and 1,000 units and the final third in sites less than 500 units.
95. The Council have provided a full response to why there are no larger standalone communities in this plan, but also made it clear they intend to commence work on the next plan quickly (commencing c. 2026 with adoption in c. 2030). As Uttlesford haven't had a new Local Plan for twenty years, it is considered appropriate to first plan for a relatively simple plan that meets all requirements appropriately, but also provides a more robust baseline for future planning, helps the district to move away from piecemeal and speculative development and to provide an update policy framework to inform decision making.
96. The approach to smaller sites and the opportunity for these to be allocated in Neighbourhood Plans is thought to be highly consistent with the NPPF, the Localism Act and with the approach being followed by a large number of other authorities. Sufficient flexibility is retained for the Council to allocate sites through a plan review or sites document should this be necessary, but

as these sites are expected to deliver in years 6 to 10, they actually provide for a more robust rolling land supply position.

Core Policy 4: Meeting Business and Employment Needs

97. Overall, support is given from the site promoters at Chesterford Research Park and Taylors Farm, and Chelmsford City Council, who believe Core Policy 4 is sound and in accordance with the NPPF. Great Dunmow Town Council also consider that the policy supports their Neighbourhood Plan policies E1 (Employment Land) and E2 (Loss of Employment Land).
98. Support is offered for the conclusions of the Employment Needs Update, however another respondent claims that the evidence base and allocations in the plan do not take account of future growth at London Stansted Airport. One respondent believes that the allocation of a single large site at Takeley Street poses a risk to the need being met in full and restricts the ability of the market to respond to need in the short-term. They have suggested a more balanced approach is needed that allocates a wider range of sites in more locations to reduce the risk of under-delivery and to provide more choice for the market.
99. Some respondents believe there is a mismatch between the level of job creation and housing provision in the plan, particularly in the north of the district at Chesterford Research Park and in the Great Dunmow area. Great Dunmow sees limited employment allocations and is not on the rail network, leading to road-based commuting. A few comments state that a strategy based on growth in the wider Stansted area will deliver low-skilled and low-paid jobs in an area of high house prices, and that workers will need to travel in from places like Bishop's Stortford and East Hertfordshire
100. A few comments query the evidence base which supports Core Policy 4. It is suggested that the Plan does not make sufficient provision for new employment land and provides details of an omission site close to Bishops Stortford that could meet the described shortfall. This provision could assist the neighbouring authority and so as the Plan does not release land from the Green Belt for this additional employment site to meet additional need and for a neighbouring authority, based on this it is suggested that Plan is unsound. Several comments relate to the allocation of Land north of Takeley Street, claiming the allocation is not justified by the evidence base, particularly in terms of transport evidence. Comments also state that the allocation does not meet the identified need in the evidence base.
101. There are a number of comments which relate to different aspects of Chesterford Research Park. Overall, the allocation is supported, although there have been requests for minor amendments to update the allocation boundaries to reflect those shown on the plan submitted by Chesterford Research Park Limited and fully accord with the masterplan for the expansion area. The owner of Chesterford Research Park has provided additional evidence to justify a revised boundary.

102. A few comments states there is no need for allocations in the Stansted area due to the Northside permission and new development at Takeley, however another comment believes that the office requirement of 3-5ha in the wider Stansted area is not meeting the need identified in the Employment Needs Assessment Update, with a proposed allocation of 3ha. It is suggested that headroom should be applied to the office supply, in a similar way to the industrial supply. Another respondent has objected to the use of headroom, suggesting this will lead to an excess of industrial units which could see units standing empty and falling rents.

Councils Response:

103. The Council considers it has set out a positive strategy to meet the qualitative, quantitative and location employment needs for the district over the plan period, as set out in the Employment Needs Update report and justified via the Employment Site Selection Topic Paper. The strategy meets research and development and industrial employment needs in full with additional headroom in the south of the district in order to ensure that the required level of employment is delivered within the plan period. A lack of suitable, available and achievable sites for industrial land in Saffron Walden means that there is no headroom in this location, however the need is met through the allocation of 2.5ha as part of the mixed-use allocation.
104. The strategy takes into account and fully supports planned growth at London Stansted Airport and the Northside development and seeks to locate employment development in locations that are accessible to existing communities and planned growth, particularly in the South Uttlesford and Stansted Mountfitchet and Elsenham areas.
105. Whilst there are no additional residential allocations in this plan in the Great Chesterford area near to Chesterford Research Park, there are a significant level of completions and commitments in the area (including across in South Cambridgeshire) and further growth is planned at Saffron Walden where public transport and active travel improvements will enable sustainable access to the site.
106. The strategy is considered sound and deliverable with minor amendments to policies map boundaries, policy wording and supporting text to be discussed and explored during the examination process to ensure deliverability over the plan period.

Core Policy 6: North Uttlesford Area Strategy

107. Core Policy 6 received approximately 60 comments, mainly relating to the strategic mixed-use allocation at Saffron Walden, the role of Great Chesterford in delivering strategic development, and the strategic employment allocation at Great Chesterford Research Park.
108. At Saffron Walden, two comments were supportive of the mixed-use allocation, while others disagreed on the principle of development at this location, noting key constraints related to poor

transport connectivity and the general lack of infrastructure at Saffron Walden to accommodate committed and further development. Several comments were raised regarding the role, delivery and phasing of the link road, suggesting that the proposal does little to mitigate traffic impacts within the town. Respondents also highlighted a significant deficiency in green spaces in Saffron Walden and criticised the proposed country park as inadequate. They also sought greater clarity on the location and specifications of the proposed country park and sports pitches. Sport England considers the site development requirements in relation to sports facilities evidenced, sound and consistent with national policy.

109. Essex County Council disagrees with the relocation of the early years and childcare facility at Saffron Walden County High, suggesting that the space freed would not be sufficient to materially overcome site constraints that mitigate against expansion. ECC also notes that a new EYCC facility is needed in addition to the existing facility. NHS Hertfordshire and West Essex suggests several amendments to the supporting paragraphs of Core Policy 6 to reference financial contribution required towards off-site healthcare facilities.
110. Mixed comments were received regarding the lack of strategic housing allocations at Great Chesterford. Ickleton Parish Council strongly supports this position, suggesting that the settlement has seen significant growth with little infrastructure, that the historic environment around the settlement poses significant constraints, and that there are substantial constraints around the M11 and the local road network, including in neighbouring South Cambridgeshire. Other respondents suggested that Great Chesterford should receive a number of strategic housing allocations given its role as a Rural Local Centre, highlighting its excellent rail connections, potential to support nearby employment hubs including Chesterford Research Park and Cambridge Biomedical Campus, as well as further growth in South Cambridgeshire. Several development sites at Great Chesterford were proposed for development.
111. Several comments supported the allocation of Great Chesterford Research Park, highlighting its role as a key employment generator within the district and its contribution to the region's excellence in life sciences and scientific research. The landowner of Chesterford Research Park suggested minor amendments to update the allocation boundaries to reflect those shown on the plan submitted by Chesterford Research Park Limited and fully accord with the masterplan for the expansion area. Essex County Council emphasises that growth at Great Chesterford Research Park must be predicated on increasing sustainable modes of penetration into the development, especially public transport.

Council Response:

112. The Council is satisfied that the proposed strategic mixed-use allocation at Saffron Walden will support sustainable development and deliver much-needed infrastructure where it is needed, particularly with regards to green infrastructure, health and education facilities, and transport

improvements. The Council has continued to engage with Essex County Council and various statutory consultees to plan for the relevant infrastructure provision. The Council recognises that additional secondary education provision at Saffron Walden is needed, and the approach will be determined by more detailed feasibility work. The Plan provides for supporting secondary provision at a number of locations across the district and so can respond successfully to a range of different outcomes to any future feasibility work.

113. The Council is also satisfied that the proposed spine road through the proposed allocation between Radwinter Road and Thaxted Road will serve as a local distributor road and that the supporting transport evidence provides sufficient justification. The spine road will provide a multi-modal route around the east of Saffron Walden that will provide an alternative route for all vehicles and will be designed as the main street serving the development. The transport evidence demonstrates that the spine road does distribute traffic away from the Radwinter/Thaxted Road junction and does outperform an alternative link to the west (on the consented schemes) in distributing traffic and being suitable for all traffic, including buses and HGVs.
114. The Council considers that the decision to not allocate strategic housing sites in Great Chesterford within this Plan evidence-led and sound. The Council recognises the suitability credentials of Great Chesterford and its role within the settlement hierarchy. A number of sites have been considered through the Housing and Economic Land Availability Assessment and the Housing Site Selection Topic Paper but none are available or deliverable at the current time.
115. The Council is open to amending the precise allocation boundary of Chesterford Research Park in light of updated evidence submitted after the launch of the Regulation 19 consultation, and any potential modifications will be explored during the Examination in Public.

Core Policy 10: South Area Strategy

116. There were some comments relating to Core Policies CP10 and 10A expressing concern over the impact of additional growth from the strategic site allocations in the south of the District around Takeley and Great Dunmow.
117. Local opposition focused on the impact on the quality of the rural and natural environment around the northeast of Great Dunmow, adjoining Church End village and Parsonage Downs. Respondents felt that built development would fundamentally change the character, would impact on wildlife and on historic landscapes and views. Many comments worried about increasing the potential for localised flooding in the Bigods Lane area in the River Chelmer flood

plain. The capacity of the local road network and particularly the funnelling of increased traffic toward the old narrow bridge in Church End led many to question the traffic modelling and the feasibility of proposed mitigation for congestion, road safety issues and increased traffic volume on the conservation area, residential amenity and historic buildings.

118. Views expressed the need for community infrastructure, especially health, with support from the NHS for the allocation of land for a 1,400 m² new primary care facility at the Great Dunmow site, and another in the new Takeley local centre, to address existing capacity pressures and to absorb planned future growth. The County emphasises the need to make explicit requirement for childcare and early years provision.
119. With regard to Takeley there was some concern over potential impact on the historic landscape south of the Warish Hall Scheduled Ancient Monument though some recognition that proposed built development had been relocated away from south of the Ancient Monument and eastward beyond Smiths Green Lane, between Regulation 18 and 19. The protection of the rural character of Smiths Green Lane and associated Conservation Area was uppermost in comments and the need to enhance and protect the ancient woodland of Priors Wood. The location of the proposed east-west sustainable transport route with an improved bus service to the airport was questioned in terms of its viability and harmful impact on the ancient woodland.
120. Generation of excess traffic at Takeley arising from new residential, two employment sites and the proposed location of the new secondary school was cited as having severe impact on existing residential amenity, on the safety and accessibility of the B1256 and on the capacity of the Four Ashes junction and M11 Junction 8.
121. Several comments on the Flitch Way expressed concern for its ability to fulfil multiple functions and how these would be accommodated in any improvements i.e. as a bridleway, nature reserve, informal walking route and potential cycle route. They point to the fact that it once linked Braintree and Start Hill, and beyond to Bishops Stortford on the western side of the district and that the western link should be explored again.
122. By contrast, there was support for the site allocations from some developers although commentary on the indicative layout in the design guidance regarding residential densities and the disposition of built form and open space, with the suggestion for more flexibility. In particular there were comments on the amount of mitigating SANG public open space necessary because sites are located in the Hatfield Forest Zone of Influence, and on how and at what phase in development the SANG should be provided across the strategic allocations.

123. There was agreement on the need for the design framework giving a comprehensive approach to master planning the larger strategic sites, appreciating that with more than one landowner and promoter there is need for collaboration in the interest of creating cohesive new communities and providing for all the required infrastructure.

Council Response:

124. The Council is satisfied the proposed allocations will support sustainable development and are located either at the largest and most sustainable settlements, or at locations that have potential to be made more sustainable and deliver much needed infrastructure and improvements where they are needed.
125. The proposals have been substantially improved from the Reg 18 version and provide a good balance between supporting the Governments growth agenda, whilst seeking to minimise any potential impacts.
126. The allocations in the Local Plan have been informed by a comprehensive suite of evidence covering flood risk, heritage and landscape impacts and transport modelling. Where potential impacts have been identified, mitigation has been incorporated into the indicative site framework plans and the site development templates to minimise those impacts. This includes the siting of development in the least sensitive areas, the provision of significant green infrastructure improvements, requirements to deliver on-site flood risk mitigation and a strong focus on active and sustainable travel so that new residents have an alternative to the private car. Further work on these issues will be undertaken through the masterplanning and development management process as proposals take shape. Similarly, proposals for the Flitch Way are being developed, including consideration of how improvements can deliver multi-functional benefits for all users and for the sensitive habitats along and adjacent to the route.
127. With regard to SANG, Core Policy 39 sets out the council's expectation that green space will be delivered early in the development phasing while Core Policy 38 provides specific detail in relation to development within the Hatfield Forest Zone of Influence. This is reinforced by the site development templates which also set out how much SANG should be delivered on the strategic allocations.

Core Policy 12: Countryside Protection Zone

128. Many comments about the countryside protection zone policy tended to object to the justification behind the amendments made to the boundary. They highlight that the removal of the site North of Takeley Street has no justification. Many responses provided references to the original purposes of the policy and relevant evidence relating to the zone. It is also suggested

that extending the area of the CPZ to the south, is not necessary, as these areas are already protected by SSSI designations. A planning application was also referenced that was rejected for employment predominantly because of the role the CPZ played.

129. Some comments state that the 2024 study commissioned, has inconsistencies with the 2016 study, and that they both have the same purpose but different outcomes. It is suggested that the updated evidence was aimed to accommodate the employment site rather than genuine reasons. It is suggested that amendments to the boundary in its current format was done for convenience and it ignores a councillor decision in September 2021, where development should avoid altering Countryside Protection Zone boundaries.
130. Some comments suggest that the context of the CPZ is in compliance with the national policy objective of sustainable development. Comments request that a robust evidence review is undertaken to demonstrate it is necessary to prevent coalescence of settlements does not undermine the national policy objective. As the CPZ adjoins the Green Belt, a systematic review of the Green Belt would be more appropriate way of updating the CPZ as an extension of the green belt.
131. Some comments did support the CPZ policy, and they fully agree with the decision to amend the boundary to ensure that the airports rural setting is protected. They also welcome the 2024 CPZ evidence to respond positively to the findings of the 2016 study whilst also being mindful of the current settlement context and the aspirations of the current Local Plan. Comments provide support to the removal of the eastern parcel of the and they state that the A120 clearly provides a more defensible, logical southern edge to the CPZ.

Councils Response:

132. The CPZ is a local/ Uttlesford Policy, for which there is no national policy, guidance or legislative reason for it to be retained. The new Settlement Hierarchy policy provides adequate protection against speculative development in open countryside and outside the existing top tier settlements. The policy has no national status like Green Belt or AONB. However, the Council is seeking to retain the policy, but also to update it and the area affected, to ensure it is fit for purpose and effective. Many parts of the previous CPZ area have been developed and some areas do not meet any CPZ function. Whilst the Council do think that protecting a CPZ area is important, this must be balanced with the need to support national government policy, i.e., the growth agenda and to ensure development is located where it is sustainable, meets local need, has greatest potential for sustainable connections, etc.

Core Policy 16: Stansted Mountfitchet and Elsenham Area Strategy

133. Core Policy 16 received a total of 40 comments. These related to a range of topics, but there was particular focus on the allocations for new development. At Elsenham, one comment was supportive of the residential allocation, whilst some noted that the Council should be making alternative or additional allocations to support more sustainable development, and others requested that the allocation should be removed entirely. It was also queried by several respondents why additional housing growth was needed to deliver a primary school and early years facility which had already received planning permission. Lastly in relation to Elsenham, comments raised concerns with existing infrastructure capacity, including the impact of the proposed allocation on the local highways network.
134. With regards to Stansted Mountfitchet, there were comments made which questioned the procedure for allocating one of the residential sites (which is under the 100 dwelling threshold), whilst others noted the availability of alternative sites for allocation or the need for further allocations which could be accommodated within the Green Belt. Some comments noted the existing pressure on Cambridge Road and stated concern towards the suggestion that High Lane could be closed to traffic. Finally, one comment noted that the allocations propose too much open space, which represents a poor use of what is currently prime agricultural land.
135. Core Policy 16 also received comments from a few statutory consultees. Natural England commented on the Stansted allocations, welcoming the provision of significant areas of green space, but noted that it may not meet the SANG criteria. Essex County Council requested several modifications to add reference to childcare as well as early years facilities at Elsenham. Additionally, Essex County Council requested more evidence in relation to sustainable travel at Stansted Mountfitchet and transport modelling at Elsenham. Thames Water note the need for one of the allocations to deliver improvements to the capacity of the wastewater network and note the need for engagement with them.

Council Response:

136. The Council considers that the allocations proposed at Stansted Mountfitchet and Elsenham are proportionate to the level of local services and facilities and therefore comprise sustainable development. At Elsenham, whilst a new primary school has already been permitted, this is only a 1 Form Entry primary school, which Essex County Council no longer seek to deliver as it is not of sufficient scale. The allocation therefore provides additional land to deliver a 2 Form Entry primary school which is more viable for Essex County Council to operate. With regards to highways impact at Elsenham, the Council have prepared a suite of transport evidence that is proportionate to the modest allocation of 110 dwellings. The allocation is clear that a package of highways mitigation measures will be required to support the new development and that this exact package will be refined at application stage in consultation with the Local Highways Authority.
137. At Stansted Mountfitchet, the allocations deliver a more substantial level of growth, reflective of its place in the top tier of the settlement hierarchy. However, additional growth at Stansted Mountfitchet within the Green Belt would not be compliant with national policy which states that ‘exceptional circumstances’ are required to justify this. As the Council can sustainably meet its housing need outside of the Green Belt, it is not deemed that such ‘exceptional circumstances’ exist. The allocations seek deliver additional housing whilst maximising the opportunities to overcome existing infrastructure deficits, including the demonstrable need for additional green open space at Stansted. In response to the comments raising concern with regards to the closure of High Lane to through traffic, no such requirement is made through the Local Plan. This is highlighted as a potential option within the Council’s active travel evidence base to encourage safe and more convenient walking and cycling routes. The exact package of highways improvements required of the allocations will be determined at application stage in consultation with the Local Highways Authority.
138. Lastly, the Council have continually engaged with each of the statutory consultees that have commented on Core Policy 16. Modifications have been proposed to address some of the outstanding matters, including in relation to Natural England’s comment on the reference to SANG at Stansted Mountfitchet. Some of Essex County Council’s requested modifications have also been incorporated, such as further referencing of childcare facilities alongside primary school and early years infrastructure. Thames Water have been engaged with throughout the process to allow the Council to understand utilities capacity at each of the proposed allocations, and this engagement will continue through to application stage.

Core Policy 19: Rural Area Housing Requirement Figure

139. There were 194 comments received in relation to the Rural Area Housing Requirement Figure. There were overall mixed comments on the Policy, some supporting the policy, and some objecting, including to the principle of allocating Development on a settlement level rather than a parish Level. A few comments also requested that future planning permissions in a parish should reduce a villages housing requirement figure.
140. The comments in relation to the allocation in settlement rather than parish level, question why this was done and that it is particularly unfair on the Settlement of Henham. They point to the fact that there has been a significant level of development in their parish and that this makes the high allocation figure unfair. There are also comments that say this change between regulation 18 and 19 was not consulted and therefore unsound.
141. A few comments have requested that the future planning permissions after April 2024 should be considered, to ensure that the housing requirement figure reflects an up-to-date picture of existing growth in each larger village.
142. Other comments also highlighted issues with the overall methodology and that it does not reflect the true capacity of large villages actual capacity to grow, they often do cite the case of Henham and that the landscape, village character and natural beauty should be protected. They also point to the fact that many larger villages that have more facilities than Henham and therefore should be allocated more housing. Comments from Henham mainly point to the fact that development for 45 dwellings in Henham was rejected due to it being an unsustainable site, therefore allocating more housing in the village would contradict an earlier decision by the Council.
143. It is noted that there are several comments from developers citing that this method of allocating housing for larger villages would not meet the test of being positively prepared, justified or effective and therefore this would make the policy unsound. They also point to the fact that the plan still only relies on a small number of large strategic sites, and therefore the uncertainty around the allocation of smaller sites through neighbourhood plans would undermine the Local Plan. They also point to the fact that giving Neighbourhood Plans responsibility for allocating non-strategic sites, two years after adoption of the Local Plan is too long. It is noted that there are comments arguing the other way, saying that two years is not enough time for Neighbourhood Groups to prepare these plans. They point to the fact that this will significantly restrict development on smaller/medium sustainable sites in the short term. They all mainly request that rather than Neighbourhood Plans making the allocations, the Local Authority should make the allocations instead.
144. There are also comments that highlight concerns with the lack of allocation at green belt villages, particularly Birchanger and Little Hallingbury. They say that they should be set a higher housing requirement figure.

Council Response:

145. The Council considers that the approach to setting housing requirement figures for the Larger Villages is sound and based on robust data, which has been updated following consultation feedback at Regulation 18 stage when the figures were based on parish-level data instead of settlement-level data. The housing requirement figures now fully reflect the settlement hierarchy and spatial strategy of the district (including Green Belt) as well as the latest housing monitoring data and HELAA capacity. There is no national methodology to calculating housing requirement figures, but the method outlined in the Larger Villages and Newport Housing Requirement Topic Paper is considered to be a sound one in the Uttlesford context.
146. The two-year time period for Neighbourhood Plans to be prepared is considered to be a realistic one. A shorter timeframe is considered to apply undue pressure on Neighbourhood groups to progress quickly; whilst any longer may delay development unnecessarily. A two year period is considered an appropriate balance that provides a realistic amount of time for the Parish Councils to prepare the evidence and engage with their residents. The two-year requirement for Neighbourhood Plans to be prepared only applies from the date of plan adoption. With an average 18-month examination period the time between Regulation 18 and plan adoption could be two and a half years, with the two-year period on top of this resulting in four and a half years to prepare a Neighbourhood Plan. This is considered sufficient, with the Council supporting under the "duty to support" Neighbourhood Planning, and not relying on housing delivery from the Larger Village allocations until later on in the plan period, after the initial five-year housing land supply period.

Core Policy 40: Biodiversity

147. While several organisations including Natural England, Greater Cambridge Shared Planning, Great Dunmow Town Council, Little Easton Parish Council and Littlebury Parish Council have expressed support for the 20% Biodiversity Net Gain (BNG) requirement, a number of comments from developers and site promoters suggest that the minimum 20% BNG requirement exceeds the requirement of the Environment Act without justification and have requested a modification be made to the policy to reflects the statutory requirement of 10% BNG.
148. Respondents have raised viability concerns with the requirement, with several noting that the viability assessment's assumptions on the cost of off-site credits fall short of current actual costs. The Home Builders Federation have requested that the Core Policy 40 is updated to consider viability.
149. The application of the policy to non-residential sites is also questioned.
150. STAL 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. STAL have requested Core Policy 40 is updated to reflect this, with a cross-reference to Core Policy 11.

Council Response:

151. The Council published evidence related to Biodiversity Net Gain in July 2024 which demonstrates the existing deficiencies across the District and the significant potential for improvement where development takes place on greenfield sites which are currently in monocultural arable use. The viability assessment does provide evidence that the increased requirement will not lead to sites becoming unviable for development but the Council recognises that costs for delivering on-site BNG or purchasing off-site credits may rise or fall compared to those used in the plan-level viability assessment.
152. The statutory BNG requirement applies to the majority of developments, including non-residential proposals, with a limited number of exempt developments. for consistency with national policy and legislation the Council does not propose to broaden the scope of exempt developments under Core Policy 40.

Core Policy 56: Affordable Dwellings

153. Several comments offer support for Core Policy 56 in principle and welcome the stated tenure mix and flexibility built into the policy.
154. It is noted that the Local Plan establishes a number of policy requirements that will have implications for a developments viability, including the Core Policy 56 affordable housing requirement and the Core Policy 22 net zero operational carbon requirement. Some comments suggest that the financial implications of these requirements must be tested holistically.
155. A couple of comments have suggested exceptions based on viability with one comment proposing the inclusion of a provision within the policy which allows for developers to reduce the percentage of affordable homes being provided if they can demonstrate it is unviable. Another comment states that the policy is not effective as the provision of affordable housing is always subject to site specific viability discussions and that therefore, a one size fits all approach is not appropriate.
156. A few comments note that criterion i) of the policy should allow for full flexibility between the delivery of First Homes or shared ownership products.

157. Some respondents seek clarity on the distribution of affordable homes and request a clear number or percentage of dwellings that can be located together before it is considered inappropriate clustering.

Council Response:

158. The Council consider that Core Policy 56 as written is sound and based on a proportionate level of evidence. This evidence includes a detailed Viability Assessment which incorporates the requirements of Core Policy 56 into its calculations to ensure that new development would not be made unviable.
159. National Policy is clear in setting out that development viability is a material consideration at application stage and Core Policy 56 does not need to explicitly duplicate this fact. The policy is appropriately flexible to accommodate site specific viability factors, however, setting a singular affordable housing percentage gives the Council greater certainty that its identified affordable housing needs can be met, whilst providing clarity to developers on development expectations.
160. In relation to the policy's requirement for First Homes, this requirement has been made as flexible as possible, whilst acknowledging that National Policy requires Local Plan policies on affordable housing to deliver at least a 25% proportion as First Homes. Finally, Core Policy 56 sets out in clear detail the acceptable number of affordable dwellings that can be clustered.

Conclusion

161. In conclusion, this statement has demonstrated how Uttlesford District Council has effectively engaged with stakeholders for Regulation 19 Consultation (Town and Country Planning Act 2012). The statement summarises the key issues raised in the consultation process, with detailed summaries and responses provided in Appendix 3.
162. It is notable that the total number of responses received to the Regulation 19 consultation was roughly half of that received for the Regulation 18 consultation and that a number of key issues raised at Reg 18 have not been raised at Reg 19. The Council consider that this is, at least in part, due to the changes made to the plan between these stages to make improvements and respond to the earlier stage of consultation.
163. Whilst there are still a good number of responses, they do provide a broad spectrum of views, with comments objecting and supporting. In many cases there are responses asking for less of something and others asking for more of the same thing. It is the case that the Council's position and what the Local Plan is proposing is more in the middle of many of the responses than many respondents will have realised.

164. Overall, the Council are satisfied the Local Plan is Sound, albeit it is recognised there may need to be some modifications to help make refinements and ensure the policies are as effective as possible. For this reason, the Council have prepared a Proposed Modifications⁶ schedule, informed for the most part by the Regulation 19 consultation responses, to help refine the plan. The majority of these fall into an 'additional' modifications category and so do not affect plan soundness but are nonetheless considered helpful.
165. The appendices to this statement show how individual comments and issues raised have been responded to. This follows the Council's commitment to respond to every issue raised.

⁶ Proposed Modification Schedule available here: https://www.uttlesford.gov.uk/media/13536/Modification-Schedule/pdf/ULP7_2024-12-17_Proposed_Additional_Modifications_Schedule.pdf?m=1734519483303

Appendix 1: Press release links.

Local Plan Timetable Update (11/06/24) - <https://www.uttlesford.gov.uk/article/9339/Local-Plan-timetable-update>

Final round of consultation for Draft Local Plan (31/07/24) - <https://www.uttlesford.gov.uk/Final-round-of-consultation-for-Draft-Local-Plan>

Find out more about Local Plan at consultation events (23/08/24) - <https://www.uttlesford.gov.uk/article/9442/Find-out-more-about-Local-Plan-at-consultation-events>

Two weeks left to have your say on Draft Local Plan (30/09/24) – <https://www.uttlesford.gov.uk/article/9498/Two-weeks-left-to-have-your-say-on-Draft-Local-Plan>

Appendix 2: Local Plan Advert.

Uttlesford Local Plan



We are now consulting on the
Uttlesford Draft Local Plan.
The consultation will open on **8 August** and
close on **3 October**.

More information is available at:
www.uttlesford.gov.uk/new-local-plan



SEPTEMBER

**MON
02**

**STANSTED &
ELSENHAM 5-8PM**
↳ Ugley Village Hall, CM22 6HR

**WED
04**

DUNMOW 5-8PM
↳ Foakes Hall, Great Dunmow
CM6 1DG

**MON
09**

**SAFFRON
WALDEN 5-8PM**
↳ SW Town Hall, CB10 1HZ

**TUE
10**

TAKELEY 5-8PM
↳ Priors Green Community Hall,
CM6 1YE

Come along
to one of our
drop-in
exhibitions to
find out more
about the
plan, and how
to have your
say.

More info



Appendix 3: Local Plan Comment Summaries and Responses

The summaries and responses for each of the issues identified in the Regulation 19 consultation are presented in separate tables by chapter and policy, as follows:.

- Chapter 1: Introduction
- Chapter 2: Spatial Portrait
- Chapter 3: Spatial Vision and Objectives
- Chapter 4: Spatial Strategy
- Chapter 5: North Uttlesford Area Strategy (Including Site Development Template comments for Saffron Walden)
- Chapter 6: South Uttlesford Area Strategy (Including sub-spreadsheets for East of Takeley, Great Dunmow, Land North of Taylors Farm and Land between A120 and Stortford Rd, and Site Development Template comments for Takeley and Great Dunmow)
- Chapter 7: Stansted and Elsenham Area Strategy (Including Site Development Template comments for Stansted and Elsenham)
- Chapter 8: Thaxted and Rural Area Strategy
- Chapter 9: Climate Change, Transport and The Environment
- Chapter 10: Economy and Retail
- Chapter 11: Building Healthy and Sustainable Communities
- Chapter 12: Monitoring and Implementation
- Local Plan Appendices (Including General Site Development Template comments)
- Local Plan Evidence