

Appendix 1 – Essex County Council Response to Uttlesford Draft Local Plan 2021 - 2041 (Regulation 18) (Consultation November 2023)

1. Overview

- 1.1 Thank you for consulting Essex County Council (ECC) on the Draft Uttlesford Local Plan (Regulation 18) (DULP) consultation published in November 2023.
- 1.2 As plan preparation continues, ECC is committed to working with UDC through the established mechanisms to prepare evidence that ensures the preferred spatial strategy, policies and site allocations are sound, viable and deliverable, where future development is aligned to the provision of required local and strategic infrastructure.
- 1.3 A Local Plan provides a platform from which to secure a sustainable economic, social and environmental future to the benefit of residents, businesses and visitors. A robust long-term strategy will provide a reliable basis on which UDC, ECC and its partners may plan and provide the services and required infrastructure for which they are responsible. To this end, ECC will use its best endeavours to assist on strategic and cross-boundary matters through the duty to cooperate, (or any replacement) including engagement and co-operation with other organisations that may have relevance. This will ensure UDC, in consultation with ECC, can plan and provide the necessary cross boundary infrastructure and services; whilst securing necessary funding.
- 1.4 ECC notes UDCs local plan preparation timetable, particularly the time given to the preparation of the Submission Plan, where consultation is expected in Summer 2024. This emphasises the need for ECC to provide UDC with detailed comments on the DULP to ensure changes are fully considered and can be reflected in the Submission Plan.

2. ECC interest in the Uttlesford Draft Local Plan Consultation

- 2.1 ECC aims to ensure that local policies and related strategies, including those of neighbouring authorities, provide the greatest benefit to deliver economic renewal, ambition and equality to create a buoyant economy for the existing and future population that lives, works, visits and invests throughout Essex. For strategic and cross boundary matters, this is likely to include a balance of land uses to create great places for all communities and businesses across all sectors; and that the developer funding for the required infrastructure is clear and explicit from the outset. As a result, ECC is keen to understand, inform, support and help refine the formulation of the development strategy and policies delivered by local planning authorities (LPAs) within and adjoining Essex. Involvement is necessary and beneficial because of ECC's role as:
 - the highway and transport authority, including responsibility for the development and delivery of the Essex Local Transport Plan; the lead authority for education including early years and childcare (EYCC), Special Education Needs and Disabilities, and Post 16 education; Minerals and Waste Planning Authority; Waste Disposal Authority, Lead Local Flood Authority; lead advisor on public health; and responsibilities for adult social care in relation to the securing the right housing mix which takes account of the housing needs of older people and adults with disabilities;
 - an infrastructure funding partner which seeks to ensure that development allocations proposed are realistic and do not place an unnecessary (or unacceptable) cost burden on the public purse and, specifically, ECC's Capital Programme;
 - major provider and commissioner of a wide range of local government services throughout the administrative county (and where potential cross boundary impacts need to be considered); and
 - advocate of the Essex Climate Action Commissioner's (ECAC) Report 2021 Net-Zero: Making Essex Carbon Neutral (July 2021) providing advice and

recommendations for action on climate change mitigation and adaption including setting planning policies which minimise carbon. This work has been tailored for use in the county of Essex. In November 2021 the ECC Response to Net Zero: Making Essex Carbon Neutral report was approved by ECC's Cabinet with regard to land use and green infrastructure; energy; built environment; transport and waste matters.

- 2.2 In accordance with the Duty to cooperate (or any replacement), ECC will assist and contribute cooperatively to the review of the Uttlesford Draft Local Plan, particularly within the following broad subject areas,
- Evidence base. To review relevant evidence and ensure that assumptions that form the basis of the evidence are agreed where ECC is the lead authority for the infrastructure.
 - ECC assets and services. Where relevant, advice on the current status of assets and services and the likely impact and implications of proposals in the Local Plan review for the future operation and delivery of ECC services;
 - Inter-relationship between Local Plans. Including the Essex Minerals Local Plan (2014) and its Review and the Essex and Southend-on-Sea Waste Local Plan (2017) where ECC is the upper tier authority for Uttlesford.

3. Key issues and messages of the ECC response

- 3.1 The ECC response is set out within the context of national policy, including the National Planning Policy Framework (NPPF); Planning Practice Guidance (PPG); ECC's organisation plan proposals within Everyone's Essex; and ECC's strategies, policies, objectives and evidence base. The response also makes reference to the ECAC Report 2021 Net-Zero: Making Essex Carbon Neutral (July 2021) and the ECC Response.
- 3.2 The response identifies where we support emerging approaches and proposals, and where we recommend further work and engagement with ECC in order to refine and inform the Submission Plan (Regulation 19), scheduled for consultation in Summer 2024. In some cases objections are made.

Summary of the Overarching Comments

Duty to Co-operate (the Duty)

- 3.3 ECC's is committed to working with UDC as it prepares its Regulation 19 Local Plan. It is recognised this is not a duty to 'agree', but resuming regular and ongoing officer meetings (and at specific times with Members) will ensure all of ECC representations made to the DULP are discussed and resolved. ECC appreciate that these meetings provide the opportunity for both local authorities to highlight matters to inform local plan preparation and ensure its consistency with current ECC policy and guidance.
- 3.4 ECC Officers would like to further understand how information provided to UDC in mid 2024 on school scenario testing, has been appropriately and fully considered and reflected in the DULP. This most notably relates to proposed new and expanded school provision and the quantum of development proposed at Saffron Waldon, Newport, Stansted Mountfitchet and Thaxted. Further information is provided in below.
- 3.5 ECC's response as the Highway and Transportation Authority emphasises the importance of continued engagement. We acknowledge work done to date and support UDCs commitment that the transport evidence will "be refreshed following the consultation ahead of the next stage of plan preparation in 2024". This will assist in ensuring that a robust and sound transport evidence base is prepared, where modelling assumptions are reviewed, refined, and reflect the final site allocations (including recent

appeal sites). ECC will continue to engage with UDC, National Highways and Manchester Airport Group as plan preparation continues.

- 3.6 It is essential that Duty to Cooperate (or any replacement) discussions remain strong, ongoing and in particular attention is drawn to:
- ensuring full consideration is given to educational infrastructure (EYCC, primary, secondary, Post 16, training and skills) to meet the needs of future communities, and consideration is given to the viability of such infrastructure and the cost to infrastructure providers;
 - transport discussions with key partners continue to ensure a full understanding and refinement of the emerging modelling and evidence to inform the Local Plan;
 - site policy requirements align and comply with the Essex Minerals Local Plan, the Minerals Local Plan Review, the Essex and Southend-on-Sea Waste Local Plan, and any surface water flood management matters identified by the Lead Local Flood Authority; and
 - a review and update to the Infrastructure Delivery Plan (IDP) that reflects a final spatial strategy and site allocations.

Emerging Spatial Strategy contained in the DULP

- 3.7 We understand that UDC will review and update housing commitments and this is likely to influence the location and quantum of development proposed in the Submission Plan. Further discussions are therefore sought on the spatial strategy, certain growth locations and site allocations to ensure the distribution and quantum of growth across the district and its location in key settlements can viably support the required infrastructure. Comments focus on Saffron Waldon, Newport, Stansted Mountfitchet and Thaxted (objections are made to Thaxted). ECC's response aims to ensure new development fully supports education provision and does not result in a cost burden to ECC; and maximises opportunities for sustainable and active travel.
- 3.8 The response references national policy and emphasises the importance of preparing Local Plans that are infrastructure led. This requires the development of a spatial strategy with the full understanding of potential infrastructure capacity, including consideration given to –
- identifying where future incremental growth may be plausible;
 - where a scale of growth may increase the viability and deliverability of some key services;
 - an appreciation of where future growth may be more challenging, and
 - the appropriate scale and quantum of growth to provide infrastructure for future communities.
- 3.9 ECC notes there is need for the Submission Plan to consider the implications of the appeal decision at East of Highwood Quarry Great Dunmow (1,200 dwellings) (and any others), which is a significant change to both the quantum, and the distribution of growth in the district.
- 3.10 ECC would also like to further understand the implications of the 1,000 homes proposed on non-strategic sites that are yet to be identified by Parish Councils in Neighbourhood Plans in order to ensure greater certainty on specific locations within the identified Larger Villages, infrastructure provision and funding.

3.11 Area Strategy Views

A. North Uttlesford

Saffron Walden

- Sixth Form Centre – ECC recognises there needs to be a suitable and viable solution to secondary school provision in Saffron Walden and will work with UDC and Saffron Walden County High to further explore options. Reference is made to a “new Sixth Form Centre” which is proposed as part of Saffron Walden County High. At this stage ECC are not aware of such proposals and Saffron Walden County High has stated they will not consider a separate Sixth Form Centre. The proposal as framed is not deliverable and agreement on this matter must be sought otherwise it must be deleted.
- Early Years and Child Care – ECC notes the DULP fails to plan for EYCC facilities. Given the scale of development proposed two 56 place facilities are estimated to be required, one co-located with the potential new primary school and the other a stand-alone facility.
- Transport Modelling – As expected at this early stage of plan preparation, work is required with ECC as the Highway and Transportation Authority to review and refine the assumptions applied within the model. Of note -
 - Link Road connecting Thaxted Road and Radwinter Road – This is a proposed link road but its location and suitability for different forms of vehicle use, and alternative routing must be further considered and agreed with ECC.
 - Sixth Form Centre – There is yet to be agreement on the Sixth Form Centre and the impacts of school travel on the transport network are not fully understood. The location of educational facilities and provision is key to understanding potential congestion, exploring the deliverability and viability of sustainable travel options.
 - Omissions in the Model – The employment designation to the southwest of the town needs to be modelled and the B1393 included. The forecast model will also need to include an agreed and acceptable level of sustainable travel modal split that reflects likely future patterns of travel behaviour.

Newport

- Newport Primary School – ECC response recommends that further testing and discussions are required to determine whether this is a sustainable level of development in education terms. The school occupies a site with limited potential for expansion to accommodate growth. The spatial strategy is proposing 412 dwellings, this is inadequate to facilitate the delivery of a 2-form entry primary school.
- Early Years and Childcare – ECC notes that the DULP fails to plan for EYCC facilities. Given the scale of development proposed a new 30 place stand-alone EYCC facility is estimated to be required.

Great Chesterford

- Chesterford Research Park – ECC welcomes proposals at Chesterford Research Park and the economic opportunities provided for Essex. Given the location is relatively isolated, ECC recommends the Local Plan proposes to stimulate sustainable travel, through facilitating improved active travel, and links to local rail and bus routes.

B. South Uttlesford

Great Dunmow

- Helena Romanes Secondary School – ECC notes that the DULP refers to a new school at Great Dunmow. This is misleading as it is the relocation of the existing Helena Romanes school to a new campus and the secondary age range and capacity remains unchanged. Reference should be changed.
- Church End – Valley Side Neighbourhood Extension (869 dwellings) – ECC queries evidence to support the allocation as road access is limited and there are challenges to facilitate sustainable travel. ECC welcomes further transport modelling discussions through the Duty to Cooperate, to ensure the transport needs for this site are appropriately assessed and considered.
- Proposed New Primary School Church End – Further testing and discussions are required as development of the scale proposed would not fully support a new school and ECC objects to the proposed new primary school in this location. Our response acknowledges that the DULP seeks to safeguard land for educational use.
- Early Years and Child Care – The DULP fails to plan for EYCC. Given the scale of development proposed a new 56 place EYCC either co-located or a stand-alone facility is required, subject to ECC concerns regarding the potential provision of a new primary school.

Stansted Mountfitchet

- Delivery of Sustainable and Active Travel Modes – ECC notes that development proposed to the north of Stansted Mountfitchet is located at the northern boundary of the settlement. Sustainable connections are limited, which is further exacerbated as existing developments do not provide opportunities. ECC recommends a holding objection pending a review of the Uttlesford Local Cycling and Walking Implementation Plan, which may overcome this concern.
- Primary School – Further testing and discussions are required as development of the scale proposed would not fully support a new school and the existing primary school cannot be expanded to accommodate the quantum of growth. The proposed school site is adjacent to a scheduled ancient monument and consideration will need to be given to any impact on its setting. ECC also continues to welcome safeguarding land for educational use adjacent to Forest Hall School.
- Early Years and Child Care – The DULP fails to plan for EYCC. Given the scale of development proposed a new 30 place facility is estimated to be required. However, if a new primary school is provided then a co-located 56 place facility would be needed.

Takeley

- All Through School Proposal – ECC objects to the location of the ‘all through school’ site adjacent to the A120, as it is unlikely to be acceptable due to noise levels. ECC recommends identifying a more suitable location which meets the school site criteria set out in ECC’s Developers’ Guide for Infrastructure Contributions and the Garden Communities and Planning School Places Guide. Furthermore, the school allocations must be adjacent to each other to facilitate the establishment of the all-through school campus.
- Early Years and Child Care – The DULP fails to plan for EYCC. Given the scale of development proposed two new 56 place and one 30 place EYCC facilities are estimated to be required. If the all-through secondary school is provided, then one 56 nursery should be co-located with the primary school and the other two as stand-alone facilities.

- Transport Modelling – ECC's response demonstrates that the modelling requires refinement to replicate existing conditions at M11 J8, in particular the B1256 approach from Takeley which encounters significant queuing. This is likely to impact on how traffic exits any allocation in Takeley, impacting routes through the airport or junctions at Great Dunmow (capacity at A120 junction is an issue).
- Masterplanning – ECC recommends that a joint masterplan for the area be developed, including allocations at Stansted and Northside, to ensure the distribution and layout facilitate sustainable and active modes.
- Core Policy 11: London Stansted Airport – ECC does not support the current wording and recommends that this policy be strengthened to reflect national policy and provide a clear understanding of the anticipated planning context/growth anticipated during the plan period. Comments provide views on how the policy may be redrafted. Views are also expressed in relation to the amendment to the Countryside Protection Zone (CPZ).

C. Thaxted Area Strategy

- Proposed New Primary School – ECC's response indicates that the scale of growth proposed at Thaxted is insufficient to make a new school viable. Furthermore, Thaxted Primary cannot be expanded, therefore the proposed growth is unsustainable in education terms, hence ECC objects to this proposal.
- Early Years and Child Care – The DULP fails to plan for EYCC. Given the scale of development proposed a new 30 place EYCC facility is estimated to be required (subject to objections regarding the provision of primary education and level of growth at Thaxted).
- Sustainable Transport – ECC notes that there is lack of sufficient evidence to illustrate the suitability of the location on sustainable transportation grounds. There are also significant difficulties of sites linking onto the B184 (and the village centre), due to the minor nature of existing roads. ECC questions the use of the current bus service to enable persons living in more remote parts of Uttlesford to access local employment and education provision. Further transport evidence is required to ECC to support proposed growth at Thaxted.

D. Rural Area Strategy

- Further Site Assessments – ECC notes that UDC is using the Local Plan consultation for Parish Councils and local communities to propose further allocations for development in the next version of the Local Plan (Submission Plan - Regulation 19). ECC would expect UDC to undertake appropriate site assessments that are supported by relevant evidence to determine whether there is appropriate social, physical, and environmental infrastructure to support such proposals. ECC welcomes further discussions to discuss any sites brought forward, to understand the infrastructure needs, deliverability and viability.

Education

- 3.12 ECC views highlight that the Uttlesford Local Plan must fully appreciate and reflect ECCs role as the lead authority for Education comprising primary, secondary (including sixth form), EYCC, Special Educational Needs and Disabilities (SEND), and Post 16 education; and a lead authority involved in adult learning and skills. ECC has a statutory duty under the Education Act (1996) (the Act) and the Childcare Act (2006) to secure sufficient childcare for working parents (inclusive of free provision). Under section 14 of the Act, local authorities must secure sufficient school places to serve their area.

- 3.13 It is noted that while the Uttlesford Draft IDP that accompanies the DULP includes references to EYCC, Special Educational Needs and Disabilities (SEND), post 16 and training and skills, the necessary requirements are not included in the DULP. ECC will work with UDC to ensure the Submission Plan includes requirements that reflect the spatial strategy.
- 3.14 The ECC response highlights that due consideration must be given to EYCC facility needs arising from local plan growth and provides UDC with an appreciation of the scale of provision that is required for strategic development sites and localities.
- 3.15 In reviewing UDC's proposed spatial strategy set out in the Area Strategies (Chapters 5 – 7) further discussions are sought with UDC and consideration given to the scale of growth proposed. This relates to the ability to deliver primary and secondary education to meet the needs of the future communities, otherwise there is an unacceptable financial burden on ECC to fund schools.
- 3.16 ECC will work with UDC to review the spatial strategy to ensure the full range of educational infrastructure needs for the future communities within Uttlesford are addressed.
- 3.17 ECC, as the lead authority for education, will therefore need to undertake a full housing scenario test (once a spatial strategy has been agreed) to assess the impact and suitability of individual development sites, particularly in terms of available school capacity, need for new schools, expansion of existing schools, and any need for school transport (which ECC will resist). This will be undertaken to support the Draft Local Plan scheduled for consultation in Summer 2024. An additional assessment will be undertaken to consider the implications on EYCC and Special Educational Needs and Disability (SEND) provision.

Transportation and Highways

- 3.18 Throughout the response comments have been expressed with regards to the need to review, refine and clarify transport modelling. Furthermore, ECC are mindful that transport evidence is still being undertaken, and the outputs need to be considered to allow ECC to provide an informed view on the spatial strategy. ECC as the Highway and Transportation Authority will continue to engage with UDC as plan preparation continues to review the implications from published evidence on the future spatial strategy and policies.

Climate Change

- 3.19 Climate Change provisions are very strong in the DULP. The ECC response strongly supports the holistic approach to climate change and sustainability which is facilitated through the requirement for applicants to submit a Climate Change and Sustainability Statement. ECC notes and supports the inclusion of an overarching policy to address climate change, entitled Core Policy 1: Addressing Climate Change which then links to a suite of detailed policies that tackle specific issues. Furthermore ECC supports that UDC have sought to adopt the pan-Essex net zero policy approach. Our response provides further comments on how the precise wording of the policy may be amended to better reflect the Essex policy and recently adopted Local Plans from other Local Authorities nationally, therefore providing UDC with the most recent best practice examples for consideration.

Economic and Employment Strategy

- 3.20 ECC recommends UDC update and review their Economic and Employment Strategy ensuring it is consistent with the emerging Local Plan. An up-to-date Economic Strategy would help to ensure that the Local Plan provides a mix of employment areas and floorspace that aligns with a clear sectoral strategy, meeting occupier requirements and stimulating further demand.

Minerals and Waste

- 3.21 ECC as the Minerals and Waste Planning Authority (MWPA) welcomes the reference to the Minerals Local Plan (MLP) and the Waste Local Plan (WLP) forming part of the statutory Local Development Plan for Uttlesford.
- 3.22 ECC seeks discussions with UDC to consider the outputs of the MLP Review (where consultation will take place February 2024) site assessment process and the relationship between these sites and the DULP and more importantly its next iteration (Regulation 19).
- 3.23 The MWPA has undertaken a high-level assessment of the DULP site allocations against the MLP and WLP and recommend individual site policies reference the need for a Mineral Resource Assessment, Minerals Infrastructure Impact Assessment and/or a Waste Infrastructure Impact Assessment to be undertaken, as set out in Appendix A. This will ensure compliance with the MLP and WLP; and any mineral resource is not sterilised, prior extraction can be considered as part of the non-mineral development process, and to ensure the continued and future operation of the waste and mineral infrastructure is not compromised.
- 3.24 ECC as the MWPA also recommend the emerging Local Plan Policies Map and/or other map/s show relevant mineral mapping layers which will be supplied to UDC.

London Stansted Airport

- 3.25 The ECC response recommends UDC strengthen the significant role that London Stansted airport plays within Uttlesford and its wider strategic role for Essex, the region and the UK economy. It is the third largest airport in the London system; and has the busiest single terminal airport in the UK with capacity and planning permission to accommodate further growth in movements, passengers and routes. Stansted is a driver for growth across Essex, the East of England and London, supporting jobs (over 12,000) and economic productivity (contributing (£1 billion annually to the national economy), and a key facilitator for the tourism sector. It is a key catalyst for wider economic growth and inward investment.
- 3.26 The ECC response seeks reference to Stansted's role in cargo air freight. The airport has planning permission for 16,000 cargo movements and is the UK's second largest cargo airport by weight. It is important that the Local Plan appreciates the matters that should be considered in the effective delivery of this role. The success of Stansted's cargo performance is due to its location as a gateway to London, the Southeast and the Midlands - onward travel connections provided by the M11 and A120 ensure that cargo can be distributed throughout the UK via the road network. There are also excellent freight handling facilities on site at the World Cargo Centre and opportunities for further development.
- 3.27 It is important to note that Stansted has been at the forefront of recognising the importance of having a skilled aviation sector. The Stansted Airport College (established

in 2015) was the first purpose built college at a UK airport. ECC's response highlights where these roles can be emphasised.

- 3.28 ECC also recommends that UDC review Department for Transport aviation policy to ensure emerging local plan policy is strengthened, in particular the response highlights where Core Policy 11: London Stansted Airport may be enhanced. ECC does not support the current policy as it is too vague and lacks sufficient clarity to ensure sufficient mitigation is in place if future growth at the airport is proposed. It also fails to give an understanding of what the planning context for growth at Stansted throughout the duration of the plan is envisaged.

Countryside Protection Zone (CPZ)

- 3.29 ECC appreciates the value placed by residents and communities of the role that the CPZ performs within Uttlesford. The CPZ has, to a large extent, facilitated the protection of the rural character and setting of Stansted airport and has assisted in the airport being referred to as the 'airport in the countryside'.
- 3.30 ECC's response recommends that any boundary change should be supported by justification/evidence, assessed against the CPZ's role as outlined in Policy S8 of the 2005 Uttlesford Local Plan and aligned with any new local plan CPZ policy. Any assessment should be proportionate to the scale of any boundary change and development proposed.

Green Infrastructure

- 3.31 ECC broadly supports the approach taken in the DULP, but the ECC response highlights where this role can be better acknowledged, and how 'multifunctional GI' can assist in delivering other strategic objectives e.g. climate change, promoting active travel and enhancing mental and physical health. The Local Plan can make a strong commitment towards the delivery of multifunctional GI and biodiversity net gain.

Public Health and wellbeing

- 3.32 ECC, as lead advisor on public health matters, seeks stronger references to health and wellbeing to better reflect the NPPF and local evidence such as the Essex Joint Strategic Needs Assessment and Uttlesford Health and Well Being Strategy. The new local plan will also need to include a policy with regards to Health Impact Assessments (HIAs) for larger development proposals and to strengthen site allocation policies requiring HIAs on large strategic housing site allocations. ECC recommend the site thresholds contained in the 'Essex Healthy Places Advice - Notes for planners developers and designers' (hosted on the Essex Design Guide website) are incorporated into policy, as these have been incorporated into most districts recently adopted Local Plans. The Hot Food Takeaway policy also needs review. On all these matters ECC can assist UDC.

Adult Social Care / Independent Living.

- 3.33 It is recommended that UDC engage ECC to explore further and provide additional evidence, on the requirements and needs for specialist and supported housing for vulnerable adults within the district and related infrastructure and how this can be incorporated into the Strategic Housing Needs Assessment evidence. ECC welcomes the acknowledgement of the need to consider addressing the specialist housing needs within Core Policy 54. ECC would welcome the opportunity to explore how existing housing policies can better incorporate extra-care housing and independent living; supported living for people with disabilities and/or care needs and provision of affordable housing for those leaving supported accommodation, including care leavers.

Developer Contributions and Community Infrastructure Levy (CIL)

- 3.34 In the response ECC seek a review of Core Policy 5 to ensure a consistent approach and framework for the delivery of relevant infrastructure from developers. ECC also supports UDC adopting CIL. UDC is still to progress work on CIL and refine its Infrastructure Delivery Plan. Consequently, at this stage of plan preparation it is not possible to consider any infrastructure funding gap or identify the cost of infrastructure required to support the Local Plan. Hence, work has not progressed with regards assessing the viability of the Plan itself, and an appropriate CIL charging rate.

Infrastructure Delivery Plan (IDP)

- 3.35 ECC will work with UDC as it prepares an update to the IDP. All new development will be required to be supported by the required local and strategic infrastructure, where the IDP will reflect up to date costings, is aligned with development phasing and requirements are appropriately reflected in Local Plan and site allocations policies. It is important to acknowledge that the IDP is a 'living document' with the information provided therein regarding necessary infrastructure and its costs being a 'snapshot' in time. The information within the IDP will be subject to further review as part of the detailed planning application process, where specific details will become known about the land use mix, housing mix, site and wider infrastructure requirements and their detailed costings (including indexation).

Format of DULP

- 3.36 ECC recommend the 'Site Development Templates' are turned into 'Site Allocation Policies' in the Submission Plan to ensure their intention, use and weight are fully understood rather than being an 'appendix' to the plan.

General comments

- 3.37 A range of general comments to support consistency and clarity are provided for the consideration of UDC in the preparation of the Submission Plan.

4. ECC Detailed Response

- 4.1 The ECC response is set out in table 1.1 and 1.2 and reflects the order of the DULP.

Table 1.1 - Overarching Education Comments on the UDC Draft Local Pan Regulation 18

Nature of Response Key

Support	S
Object	O
General Comment	GC
Change Required / Review	R

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
Throughout	CR/R	<p>Role as ECC as the lead authority for Education</p> <p>The following provides information on ECCs role as the lead authority for education. The information provides context and can also be used, where applicable, to update the Draft Infrastructure Delivery Plan.</p> <p>ECC's role as lead local authority for education covers early years and childcare (EYCC), primary, secondary (including sixth form), Special Education Needs and Disabilities (SEND), and Post 16 education; and a lead authority involved in adult learning and skills.</p> <p>ECC has a statutory duty under the Education Act (1996) (the Act) and the Childcare Act (2006) to secure sufficient childcare for working parents (inclusive of free provision). Under section 14 of the Act, local authorities must secure sufficient school places to serve their area. The available schools must be sufficient in number, character and equipment to provide all pupils with the opportunity of an appropriate education (including those with Special Educational Needs).</p> <p>Section 2 of the Education and Inspections Act (2006) further places ECC, as the appropriate local authority, under a duty to secure diversity in the provision of schools and increase opportunities for parental choice.</p>	<p>ECC recommends that in reviewing the Draft Local Plan, Duty to Cooperate discussions with ECC and other relevant partners continue to take place to ensure sufficient, deliverable and viable education provision to meet the needs arising from the planned growth are undertaken. The Submission Plan (Regulation 19) must ensure the needs are met for –</p> <ul style="list-style-type: none"> • primary • secondary (including sixth form) • early years and childcare (EYCC) • Special Education Needs and Disabilities (SEND) • Post 16 education, and • adult learning and skills. <p>Currently the emerging Local Plan does not adequately address all of the needs.</p>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>Subsequent legislation has also encouraged the development of a more diverse range of education providers, in particular Academy Trusts and Free Schools. To meet these duties, ECC acts as a commissioner rather than a provider of new schools and, in order that potential providers may express their interest in running a school, will set out the requirements for the provision needed to serve a new community.</p> <p>Regardless of whether local schools have Academy status, are Free Schools, or are Maintained Schools, ECC is the appropriate authority to assess the requirement for additional school places to serve any new housing developments proposed by a Local Plan or supported by a Neighbourhood Plan. Where a Section 106 agreement (developer contribution) delivers the land and funding for a new school or EYCC facility, ECC will usually procure the buildings and then transfer it to the successful school provider.</p> <p>The Department for Education (DfE) Raising the Participation Policy requires all young people in England to continue in education or training beyond the age of 16. Young people have a choice about how they continue in education or training post-16, which could be through:</p> <ul style="list-style-type: none"> • full-time study in a school, college or with a training provider; • full-time work or volunteering (20 hours or more) combined with regulated part-time education or training (about one day per week); or • an apprenticeship or traineeship. <p>ECC has a duty to secure sufficient suitable education and training provision for all young people in their area who are over compulsory school age but under 19 or aged 19 to 25 and for whom an Education, Health and Care Plan (EHCP) is maintained. ECC determines 'sufficient' as having enough post 16 provision to meet need and choice. ECC determines 'suitable' as offering a range of academic, technical and vocational provision against demand. To fulfil this, local authorities need to have a strategic overview of the provision available in their area and to identify and resolve gaps in provision.</p>	

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>To assist in the delivery of statutory duties, ECC seeks to ensure that appropriate and necessary information is used to inform emerging evidence as Local Planning Authorities (LPAs) prepare their Local Plans.</p> <p>The key message is that ECC, as the lead authority for education, will need to undertake a full housing scenario test, once a final spatial strategy has been agreed, to assess the impact and suitability of individual development sites, particularly in terms of available school capacity, need for new schools, expansion of existing schools, and any need for school transport (which ECC will resist). This will be undertaken to support the Submission Plan scheduled for consultation/publication in Summer 2024. An additional assessment will be undertaken to consider the implications on EYCC and Special Educational Needs and Disability (SEND) provision.</p>	
Throughout	CR/R	<p>Early Years and Child Care (EYCC) Provision</p> <p>The emerging Local Plan must acknowledge the statutory duty of ECC under the Education Act (1996) (the Act) and the Childcare Act (2006) to secure sufficient childcare for working parents (inclusive of free provision). In reviewing the content of the Local Plan it is apparent that there is no reference to Early Years and Child Care provision. This is of significant concern for ECC.</p> <p><u>Future Early Years and Childcare Requirements</u></p> <p>The early years and childcare requirements detailed in the ECC response have been based on the <u>ECC Developers' Guide to Infrastructure Contributions</u> which sets out the formula used in EYCC and pupil place planning (schools) to estimate the number of pupils and places from new homes and where appropriate, the required financial contributions and/or land requirements for new EYCC facilities.</p>	<p>Due consideration will need to be given to the needs arising for EYCC facilities within the Local Plan, and relevant development management and site templates (recommended to be transferred into Site Allocation policies) amended to ensure the future EYCC requirements are clearly stated. ECC requires continued and ongoing Duty to Cooperate discussions to ensure that the needs of EYCC are addressed in the Submission Plan (Regulation 19).</p>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>ECC also uses the Essex Childcare Sufficiency report to help assess the sufficiency of childcare places in Essex. EYCC provision comprises a range of private, voluntary and independent providers which includes full day care nurseries, pre-schools, childminders, school run provision, and wrap around care (Breakfast, After school and Holiday clubs). The Government has recently announced increased funding for childcare provision as set out below:</p> <ul style="list-style-type: none"> • At present, all parents and carers of 3 and 4-year-olds are entitled to 15 hours a week childcare support with registered childcare providers. Eligible working parents and carers of children aged 3-4 years can also get an additional 15 hour childcare support, bringing their total up to 30 hours a week. Some eligible parents of 2-year-old children may also be entitled to 15 hours childcare support, if they receive some additional forms of government support. • Starting from April 2024, existing childcare support will be expanded in phases. By September 2025, most working families with children under the age of 5 will be entitled to 30 hours of childcare support. The changes are being introduced gradually to make sure that providers can meet the needs of more families. This means that: <ul style="list-style-type: none"> • From April 2024, eligible working parents of 2-year-olds will be able to access 15 hours childcare support. • From September 2024, 15 hours childcare support will be extended to eligible working parents of children from the age of 9 months to 3-year-olds. • From September 2025, eligible working parents of children aged over 9 months will be entitled to 30 hours of childcare a week. <p>Like the existing offer, depending on the provider, these hours can be used over 38 weeks of the year (during school term time), or up to 52 weeks if you use fewer than your total hours per week.</p>	

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>ECC is still considering the implications on these changes, which will be incorporated into an updated Developers' Guide (in due course). It is anticipated that this will require a greater factor to be applied to new development meaning that the requirements stipulated in this response should be regarded as a minimum. ECC reserves the right to review these requirements based on any updated Guide and any revisions to the spatial strategy to be incorporated in the Regulation 19 Plan.</p> <p>The DULP specifies infrastructure requirements for the proposed allocated sites in 'Site Development Templates' (Appendix X of the DULP) but at present no reference is made to EYCC requirements. These site policies should specify the land requirement, size and type of facility (co-located and/or stand-alone).</p> <p><u>Appreciation of the Scale of the Issue</u></p> <p>To provide UDC with an estimate of the scale of the issues regarding necessary EYCC requirements, a high level assessment of the 10 new site allocations identified in Figure 4.2: Key Diagram - Uttlesford's Spatial and Area Strategies has been undertaken. The assessment has assumed that all dwellings would generate an early years and childcare place. Additional capacity generated in excess of the need for new facilities will require a developer contribution, which must be captured through the overarching Core Policy 5: Providing Support Infrastructure and Services.</p> <p>The new site allocations in the Draft Local Plan (Regulation 18) may generate demand for around 458 early years and childcare places. Initial requirements are identified by settlement below. These requirements will be subject to review as part of the full scenario testing for the final site allocations, alongside primary and secondary education, to be undertaken to inform requirements for the Submission Plan (Regulation 19). This assessment will seek to allocate new facilities to preferred sites and</p>	

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>provide costs to inform the Infrastructure Delivery Plan and viability work. Any location for new co-located and stand-alone nurseries will be identified through site master planning.</p> <ul style="list-style-type: none"> • Saffron Walden – Sites 1 and 2 (1,280 homes) generates around 115 places which will require 2x56 place EYCC facilities, of which one should be co-located with the potential new primary school and the other a stand-alone facility. • Newport – Sites 3 and 4 (412 homes) generates around 37 places which will require 1x30 place stand-alone EYCC facility. • Thaxted – Sites 5 and 6 (489 homes) generates around 45 places which will require 1x30 place EYCC facilities (subject to concerns regarding the provision of primary education and level of growth at Thaxted). • Great Dunmow – Site 7 (869 homes) generates around 78 places which will require 1x56 place EYCC facilities. Any new facility may either be co-located or a stand-alone facility subject to ECC concerns regarding the potential provision of a new primary school. • Takeley – Site 8 (1636 homes) generates around 147 places which will require 2x56 place and 1x30 place EYCC facilities. If the ‘all through school’ is to be provided, then one 56 place facility should be co-located with the primary school and the other two as stand-alone facilities. • Stansted Mountfitchet – Sites 9 and 10 (290 homes) generates around 36 places which will require 1x30 place EYCC facility. However, if a new school is to be provided then a co-located 56 place facility will be provided with the primary school. • Rural Locations – these generate the need for around 90 places which will be considered on a case by case basis taken into account the scale of development and existing local need. <p>It is important to note that the information presented for the high level assessment outputs, were determined to reflect current EYCC statutory</p>	

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		eligibility criteria, and not the criteria expected to be introduced in April 2024. As stated ECC are determining the implications of these revisions.	
Throughout	CR/R	<p>Post 16 Education and Training Provision</p> <p>ECC has a duty to secure sufficient suitable education and training provision for all young people in their area who are over compulsory school age but under 19 or aged 19 to 25 and for whom an Education, Health and Care Plan (EHCP) is maintained. The provision of post 16 education is included within the definition of ECC having sufficient education and training provision to meet need and choice. In reviewing the draft Local Plan it is apparent that there is no reference to post 16 education.</p> <p><u>ECC Developers’ Guide to Infrastructure Contributions</u> sets out the range of contributions that ECC will seek towards infrastructure from developers and landowners to mitigate the impact, ensuring development is acceptable in planning terms. From an education perspective this includes contributions for post 16 facilities.</p> <p>ECC acknowledges that post 16 education plays a key role in skills development. The Essex Developers’ Guide to Infrastructure Contributions recommends that any large-scale development is expected to provide for the needs of post 16 education generated by its development, either through a developer contribution to assist classroom-based education; workplace learning through on site apprenticeships and/or training, or through training and courses offered at nearby further education (FE) establishments.</p> <p>Post 16 facilities are provided by the Education and Skills Funding Agency (ESFA), which is part of the DfE. The provision of FE services covers pupils over the age of 16, who are studying a course in a FE college, training provider or within their local community. ECC has a duty to secure sufficient suitable education and training provision for all young people in</p>	ECC recommends that UDC have further Duty to Cooperate discussions with ECC and relevant partners to ensure that the provisions for future post 16 education are addressed throughout the Local Plan.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>their area who are over compulsory school age but under 19 or aged 19 to 25 and for whom an education, health and care plan is maintained. To fulfil this, local authorities need to have a strategic overview of the provision available in their area and to identify and resolve gaps in provision.</p> <p>Examples of the type of provision provided include –</p> <ul style="list-style-type: none"> • <u>School 6th Forms</u> - There are 53 School 6th Forms in Essex funded by the ESFA to deliver training to 16-18 year olds. There is also some special school Post 16 provision. In 2017/18, around 10,770 learners were enrolled at school 6th Forms in Essex. In addition, a number of learners travel to school 6th Forms outside of Essex, including schools in Southend-on-Sea and Hertfordshire. There are also a number of independent schools in Essex offering Post-16 courses. • <u>Further Education and Skills</u> - comprises the following types of learning: <ul style="list-style-type: none"> ○ Education and training covering further education learning delivered mainly in a classroom, workshop or through distance or e-learning; ○ Apprenticeships which are paid jobs that incorporate on- and off-the-job training leading to nationally recognised qualifications; apprenticeships are not just for school leavers and young people; there is no upper age limit and if you're over 16, living in England and not in full-time education then you're eligible to become an apprentice; ○ Workplace learning which covers a broad range of training including basic skills, Level 2, Level 3 and higher-level skills. This training is mainly delivered in the workplace (but excludes Apprenticeships); ○ Community Learning which funds a wide range of non-accredited provision, ranging from creative and cultural learning, modern foreign languages, personal development, IT courses, employability skills, family learning and activities to 	

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>promote health and wellbeing civic engagement and community development.</p> <ul style="list-style-type: none"> • <u>Post-16 Providers Delivering Further Education and Skills</u> <ul style="list-style-type: none"> • General Further Education Colleges: There are 6 FE colleges based in Essex delivering training to young people and adults (Chelmsford College, Colchester Institute, Epping Forest College, Harlow College, USP College and South Essex College of Further and Higher Education (including Prospects College of Advanced Technology)). These colleges accounted for just over 30% of further education and skills enrolments delivered in Essex in 2016/17. In addition, a number of colleges based outside of the county deliver training to Essex residents, including Hertford Regional College, Cambridge Regional College and Havering College of Further and Higher Education plus a number of colleges further afield delivering training through distance learning or subcontracting arrangements. • Sixth Form Colleges: The Sixth Form College Colchester delivers training to 16-19 year olds. • Local Authority FE Providers: Adult Community Learning Essex (ACL), part of ECC, receives funding to deliver training in Essex and is the largest provider of adult education courses in the county. • Higher Education Institutions: Two Higher Education Institutions in Essex (University of Essex and Anglia Ruskin University – which now includes Writtle University) receive funding allocations from the ESFA to deliver further education provision. • Private sector providers: These consist of: <ul style="list-style-type: none"> ▪ Independent Training Providers: A wide range of training providers deliver training in Essex. A number are based in Essex (such as The LightBulb Ltd, LifeSkills Solutions Ltd, SEETEC Business Technology Centre) but there are also a 	

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>number of regional and national providers operating in the county.</p> <ul style="list-style-type: none"> ▪ Employers: A number of large employers are funded directly by the Education and Skills Funding Agency to deliver training programmes – employers delivering training in Essex in 2016/17 included MITIE, BT and Virgin Media. ▪ Specialist Colleges: Typically, these are colleges with a specialist curriculum offer. This also includes the Workers Educational Association, the UK’s largest voluntary sector provider of adult education which delivers a significant volume of training in Essex. 	

Table 1.2 – ECC Comments on Specific Sections of the UDC Draft Local Plan Regulation 18

Nature of Response Key

Support	S
Object	O
General Comment	GC
Change Required / Review	R

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
Chapter 1 – Introduction			
Para 1.1	S	ECC fully supports UDC preparing a new Local Plan and the emphasis placed on climate change.	Note support.
Para 1.2	GC / R	ECC supports the bullet points within this paragraph but considers that the aim of the plan should be strengthened to reflect the planning for health policy (core policy 66) and build on the consensus within the NPPF. The NPPF seeks to ensure that sustainable development is achieved, including acknowledging the health status and needs of the population are understood and considered as part of development.	ECC recommends the addition of a further bullet point – or review the last bullet - to demonstrate that health needs are considered by the Local Plan. <i>Suggested wording - “<u>ensuring Local Plan supports the health and wellbeing of Uttlesford’s population over the course of the plan period</u>”.</i>
Para 1.8	GC	ECC notes this is the first time it has seen a full version of the Regulation 18 Draft Local Plan and accordingly provides detailed comments on the spatial strategy, site allocations and draft policies.	N/A
Para 1.18	GC	ECC as the Minerals and Waste Planning Authority (MWPA) sets out support and recommendations for further matters to be considered to ensure minerals and waste issues are appropriately considered in developing the new Local Plan.	ECC supports paragraph 1.18 and the reference to the role of the MWPA and the MLP and WLP as forming part of the statutory Local Development Plan for Uttlesford. These Plans are a material consideration in planning decisions to inform local plan preparation and the determination of <u>non</u> -minerals and waste related developments.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
			<p>Once adopted, the Uttlesford Local Plan Policies Map should include the mapping layers for Mineral Safeguarding Areas (MSAs) only, as supplied by ECC as part of this consultation response. The Policies Map should not include the specific MLP or WLP site allocations nor the Mineral Consultation Areas (MCAs) and Waste Consultation Areas (WCAs), which are subject to change and the most up to date list can be found on the ECC website.</p> <p>ECC request that LPA websites, Local Validation Checklists and internal GIS site constraints layers include the MLP policies (S4, S5, S8, & S9) and WLP policies (2 and 4) recognising that the MLP and WLP form part of the statutory Development Plan and are a material consideration before making any planning decisions.</p>
Para 1.23	GC	ECC notes the proposal/opportunity for communities to plan for non-strategic (less than 100) sites if they so wish.	Refer to specific comments in Chapter 8 but further discussions with UDC are sought on this issue to understand implications on infrastructure provision and funding.
Para 1.27	GC	<p>Reference is made to Statements of Common Ground and UDC having worked collaboratively with ECC on cross boundary and strategic issues. A SoCG has yet to be prepared with ECC.</p> <p>It should also be noted that while duty to cooperate meetings and discussions have taken place as the Draft Local Plan was prepared, this Regulation 18 consultation is the first time ECC has seen a consolidate draft plan and one containing the proposed spatial strategy site allocations and draft policies. Accordingly, ECC makes many comments, and in places objections, to the proposals being put forward and seeks focused and on-going engagement with UDC to ensure the full range of representations can be addressed and resolved as plan preparation continues.</p>	<p>UDC to note, consider and further discuss ECC recommendations and comments (and in some cases objections), particularly where further work is required to the Draft Plan (Regulation 18).</p> <p>ECC is committed to working with UDC through the duty to cooperate (or any replacement) as it prepares its Submission Plan (Regulation 19). While this is not a duty to 'agree', regular and ongoing officer meetings (and at specific times with Members) need to resume to ensure all of ECC representations made to the DULP are discussed and resolved. Such meetings provide the opportunity for both Local Authorities to highlight matters to inform Local Plan preparation and ensure that the Local Plan is consistent with current ECC policy and guidance.</p> <p>UDC should also refer to informal comments provided by ECC on certain working draft chapters over the Summer 2023 and ensure relevant comments are reflected within the Submission Plan.</p>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		ECC provided UDC with informal comments on various working draft chapters – but not all – in the Summer 2023. However, not all of those comments have been reflected into this Regulation 18 Draft Local Plan.	
Chapter 2 -Spatial Portrait			
Para 2.2	GC / R	The policy framework for the basis of the emerging Local Plan should explicitly refer to Department for Transport (DfT) policy and guidance that can help shape the content of emerging Local Plan policy. This particularly relates to the role and function of London Stansted Airport, currently the UK's fastest post pandemic recovering airport - surpassing pre-pandemic passenger volumes.	<p>ECC recommends that the Local Plan better reflects national DfT policy and guidance. The policy that UDC should be using to shape the Local Plan include -</p> <ul style="list-style-type: none"> • <u>Department for Transport - Beyond the Horizon - the Future of UK Aviation – Making Best Use of Existing Runways (2018) (MBU)</u>. The MBU sets out Government support for airports beyond Heathrow making best use of their existing runways, subject to related economic and environmental considerations being considered. It allows airports to increase either the passenger or air traffic movement caps to allow them to make best use of their existing runways through the submission of a planning applications. It allows applications to increase existing planning caps by fewer than 10 million passengers per annum (mppa). This policy is applicable to the Essex airports, and Stansted was the first UK airport to be granted permission on appeal following the publication of this policy. • <u>Department for Transport – Airport National Policy Statement (Airport NPS) New Runway Capacity and Infrastructure at Airports in the South East of England (2018)</u>. The Airports NPS provides the primary basis for decision making on development consent applications for a Northwest Runway at Heathrow Airport, and is an important and relevant consideration in respect of applications for new runway capacity and other airport infrastructure in London and the South East of England. • <u>Department for Transport - Aviation Strategy entitled 'Flightpath to the Future' (2022)</u>. The Aviation Strategy sets out a strategic framework for the sector. It provides clarity on the key priorities and an understanding of how Government and industry will work together to deliver them.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
			<ul style="list-style-type: none"> • <u>Department for Transport - Jet Zero Strategy – Delivering Net Zero Aviation by 2050 (2022)</u>. The strategy sets out clear targets committing the UK aviation sector to reaching net zero, or Jet Zero, by 2050 and reiterates the Government’s commitment to airspace modernisation to deliver quicker, quieter and cleaner air travel. • <u>Department for Transport - Aviation Policy Framework (2013)</u>. The Aviation Policy Framework provides key guidance for aviation matters. In preparing Local Plans it is important to note that Local Authorities should have due regard to the following matters – environmental, noise, safeguarding, public safety zones and surface accessibility. • <u>Department for Transport - Guidance on the Preparation of Airport Master Plans (2004)</u>. This guidance demonstrates the role of master plans. It is important to note that they may be integrated into a Local Plan and the airport operator should work closely with the relevant local planning authority. • <u>Guidance on Airport Transport Forums and Airport Surface Access Strategies (DETR, July 1999)</u>. This guidance provides an understanding of how airport operators can devise targets for increasing the proportion of journeys to airports by public transport and develop a strategy for achieving these targets. Targets, and the strategies for achieving them, will then feed into Local Transport Plans. The guidance also sets out the objectives for developing Airport Surface Access Strategies (ASAS). • <u>Department for Transport – Overarching Aviation Noise Policy Statement (2023)</u>. The Aviation Strategy (2022) highlighted the Government’s commitment to taking steps to refresh national aviation noise policy. A key component of this was to review and revise the national aviation noise policy statement. This statement has been revised earlier in 2023. It is important emerging Local Plan policies are consistent with this statement, and reflect current national noise policy.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
			<ul style="list-style-type: none"> Department for Transport – <u>Night Flight Restrictions at Heathrow, Gatwick and Stansted – Decision Document (2021)</u>. This document sets out night noise restrictions for the designated airports that include Stansted.
Para 2.3-2.15	GC / R	Reference should be made to the Local Skills Improvement Plan from the Essex Chambers.	ECC recommends that reference is made to the Local Skills Improvement Plan and key recommendations included in relevant plan policy and/or the evidence base as it relates to the economy, training and skills – https://www.essexchambers.co.uk/local_skills_improvement_plan_lsip.htm
Para 2.5 – 2.6	R	LEPs are now abolished and functions have moved to ECC.	Delete these two paragraphs as they no longer apply and are out of date.
Para 2.8-2.9	GC / R	ECC considers that the wording in these paragraphs should be revised and demonstrate that UDC fully understands the local and strategic significance of the airport – not only in terms of its local, regional and national economic role, but also its significance from a physical, social and environmental point of view.	<p>ECC recommends that the paragraphs be amended to ensure it is consistent with both Local Authorities (ECC and UDC) statutory and non-statutory responsibilities, and capitalise on the high level opportunities and challenges provided by the airport.</p> <p>It is imperative the Local Plan appreciates the contribution the aviation sector provides to Uttlesford, Essex and nationally through –</p> <ul style="list-style-type: none"> <u>Economy and Location</u> – appreciating the national importance of Stansted to the national and Essex economy, and the locational opportunities offered within Essex; <u>Training and Skills</u> – understanding the importance of a strong skilled labour force within the aviation sector, and the opportunities to broaden the skills offer to complement the decarbonisation of transport opportunities of the future within the sector. <u>Surface Access and Connectivity</u> – provides important national and international connections for the trade and transport of people, which will facilitate inward investment and trade benefitting the Essex and UK economy. <u>Climate Change and the Environment</u> – appreciating the increasing importance of how airports and the aviation sector must meet national climate change and decarbonisation targets, and that joint working is important to achieving these goals.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
			<ul style="list-style-type: none"> <u>Future of Flight</u> – work with the wider aviation sector and within Essex to harness the opportunities that may be provided from this aviation revolution. <p>UDC are likely to need to highlight the importance of considering noise, air quality and environmental matters as part of effective airport operations. Also see comments related to the Stansted Airport policy.</p>
Para 2.8	GC / R	ECC notes reference is made to an airport masterplan. Its role and function is much broader than covering “ground-based transport activities” and “rationale for the transport investment” and this paragraph needs to be reviewed. It is important that this is fully appreciated so that the Local Plan can provide a clear policy context to assist in developing future airport masterplans.	ECC recommends that the Local Plan shows a robust understanding of Airport Masterplans, their potential scope, role and relationship with planning policy. To assist in this it is recommended that UDC refer to Department for Transport guidance for airport Masterplans. The guidance is entitled <u>Guidance on the Preparation of Airport Master Plans (2004)</u> . It demonstrates that a masterplan should provide a clear statement of intent by an airport operator to enable future development of the airport to be given due consideration in the planning process. Airport operators are normally expected to lead in preparing a masterplan, and set out how they expect the airport to develop over time. A masterplan may be integrated into a Local Plan and the airport operator should work closely with the relevant local planning authority. Stansted Airport is currently reviewing their masterplan and the new Uttlesford Local Plan provides an opportunity to include a robust airport policy so that the full range of airport operations and considerations can be reflected in the masterplan.
Para 2.9	GC	ECC notes that the MAG Corporate Responsibility Report demonstrates a commitment to play a vital role in preserving and restoring nature in the regions they serve. They have ecology programmes and monitor ecology and nature across all three of their airports. They are keen to work and support local communities.	ECC recommends that UDC gain an appreciation of the wider role that MAG can play and ensure that the Local Plan highlights the environmental opportunities that may be explored through collaboration to enhance biodiversity and Green Infrastructure in Uttlesford.
Para 2.11 Para 2.15 Para 2.27	GC	ECC welcomes the reference to the Essex Climate Action Commission. A small part of Uttlesford Local Plan (5.35%) is within the Essex Climate Action Commission’s (ECAC) recommended Climate Focus Area (CFA), which is formed of	ECC recommends that the Local Plan acknowledges that Uttlesford is part of the Climate Focus Area as part of 2.15. i.e. <i>‘Of which areas of Uttlesford falls within the Climate Focus Area (CFA), which is formed of the Blackwater</i>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		the Blackwater and Colne River catchment areas The objective of this recommendation is for the CFA to “accelerate [climate] action and provide exemplars, for learning and innovation: adopting Sustainable Land stewardship practices: 100% by 2030 and Natural Green Infrastructure: 30% by 2030” (ECAC, 2021). Among the objectives of the CFA are to achieve net zero carbon, biodiversity net gain, improve soil health and air quality, reduce flooding and urban heat island effect, and enhance amenity, liveability and wellbeing of Essex communities.	<i>and Colne River catchment areas, to “accelerate [climate] action and provide exemplars, for learning and innovation.”</i> Then expand upon the CFA as part of 2.27.
Para 2.10 and 2.13	R	ECC considers that rail provides wider connectivity benefits for Uttlesford beyond that of commuting and for use by air passengers. Recent evidence from rail surveys has demonstrated that leisure travel is a major use for rail and rail operators.	It is recommended that the plan recognises the wider role that rail plays within Uttlesford.
Para 2.11	GC / R	ECC is the Local Transportation Authority (LTA) (as well as the Highways Authority) for the administrative area of Essex and is responsible for transport strategy, policy, the management, maintenance and operation of local transport infrastructure, and the implementation of necessary improvements. ECC can also decide to support the delivery of transport services which are in the main delivered commercially. It is important that ECC’s transport policies and proposals are implemented at the local level, and that ECC’s approach considers neighbouring authorities and is consistent with national policy. It is important to note that the LTA function may transfer to Greater Essex should devolution go ahead.	ECC recommends that the text within this paragraph be amended to reference ECC’s role as Local Transportation Authority, with statutory responsibility to set the transport strategy for Essex and policy through the Local Transport Plan.
Para 2.13	GC	ECC notes and welcomes that the Draft Local Plan has sought to reference the emerging Local Transport Plan 4 (LTP4). However, it is important to note that given a draft is yet to published for consultation the information presented	The Submission Plan will need to reflect the most up to date position for LTP4 and this will be provided to UDC through ongoing discussions as the Submission Plan is prepared.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>in the Draft Local Plan has now changed. There are now likely to be three key themes with decarbonisation likely to be an overarching theme and addressed by all others. LTP4 is a statutory requirement that sets out Essex's transport policy. A key purpose of the LTP is to understand the travel needs of people and businesses in Essex to raise awareness of the travel options people have and to enable more sustainable choices and journeys to be made. ECC has commenced the preparation of LTP4 covering the following three strategic themes:</p> <p><u>Supporting People, Health, Wellbeing, and Independence</u></p> <ul style="list-style-type: none"> a) People have inclusive and affordable access to key services. b) Improve physical and mental health and wellbeing. c) The transport network is safe, and feels safe, for all users <p><u>Creating Sustainable Places and Communities</u></p> <ul style="list-style-type: none"> a) All places support the transport needs of all residents b) Work with appropriate partners to design sustainable developments from the start c) Reduce transport's impact on the environment <p><u>Connecting People, Places and Businesses</u></p> <ul style="list-style-type: none"> a) Maximising the business potential of Essex b) People have inclusive and affordable access to education, employment & training c) Transport network has a secure and long-term future <p>LTP4 will reflect and incorporate the revised policy framework contained within ECACs Net Zero: Making Essex Carbon Neutral report and the Transport East: Transport</p>	

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		Strategy. These place a greater emphasis upon the provision and use of sustainable transport and the decarbonisation of the transport network.	
Para 2.13	GC / R	<p>ECC considers it is important that the Local Plan demonstrates a clear understanding of bus service provision, and how this has impacted the UDC spatial strategy. The ECC <u>Bus Service Improvement Plan was approved by Government and</u> sets out the strategy for ECC's approach to developing the bus network in Essex for 2021-26.</p> <p>There is also a document relating to Uttlesford, which is the <u>Uttlesford Area Review</u>.</p> <p>The Bus Service Improvement Plan and the Uttlesford Area Review are key elements for bus operations within Essex and specifically Uttlesford. It is recommended that the Local Plan embeds the key principles set out in these documents.</p>	ECC recommends that the Local Plan must be reviewed to ensure that the key elements from the BSIP and the Uttlesford Area Review are set out within relevant policies throughout the Local Plan and any supporting evidence. ECC can assist in drafting as the Submission Plan is prepared.
Para 2.16	GC / R	ECC recommends that the strategic significance of the A120 should be clearly articulated. The A120 provides a major trunk route to beyond Braintree, into Colchester and the International Port of Harwich. Furthermore it also has further strategic linkages to the Port of Felixstowe.	ECC recommends that the paragraph is enhanced to ensure the wider scale strategic links that access to the A120 provides, including reference to Colchester, the International Port of Harwich and Port of Felixstowe be included.
Para 2.23	GC / R	In reviewing the information presented it is acknowledged that the 'Key Challenges/Opportunities' must be strengthened to ensure the health needs of the future community within Uttlesford are appropriately addressed. This will ensure a consist approach to the NPPF and the <u>Uttlesford Health and Wellbeing Strategy</u> which should inform plan preparation.	<p>ECC recommends that reference to health may be strengthened through the addition of a bullet point, and the suggested wording is –</p> <p><i><u>"Addressing the wider determinants of health and areas of deprivation that cause inequalities within our communities"</u></i>.</p>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
Para 2.24-2.27 Spatial portrait – Environment:	GC	The spatial portrait could provide a more generalised account of the landscape character of Uttlesford in order to link to the references to the descriptions in Section 3: Spatial Vision.	ECC recommends that consideration should be given to the following, which is taken from Natural England’s ‘Natural Character Area Profile 86: South Suffolk and North Essex Clayland’ although appropriate paragraphs may be available in the recent Landscape character Area of Uttlesford (2023): <i>‘It is an ancient landscape of wooded arable countryside with a distinct sense of enclosure. The overall character is of a gently undulating, chalky boulder clay plateau, the undulations being caused by the numerous small-scale river valleys that dissect the plateau. There is a complex network of old species-rich hedgerows, ancient woods and parklands, meadows with streams and rivers that flow eastwards. Traditional irregular field patterns are still discernible over much of the area, despite field enlargements in the second half of the 20th century’.</i>
General Point – Opportunities and Challenges section	R	In reviewing the spatial portrait “challenges and opportunities” it is apparent that all are merged together, making it difficult to decipher between “challenges” and “opportunities”.	ECC considers that to strengthen the draft Local Plan there is merit in clearly identifying the separate “challenges” and “opportunities”. This would assist in understanding how the Local Plan is seeking to address the challenges and to seize the opportunities for the benefit of the new and existing living, working, visiting and investing community in Uttlesford.
Section 2 Key Opportunities and Challenges (Page 16) and Environment (pages 18 -19)	GC / R	<p>ECC expects the Local Plan to make a strong commitment towards the delivery of multifunctional green infrastructure (GI) and biodiversity net gain. GI is greater than the provision of a green space, it includes assets such as street trees, hedgerows, green walls and roofs, allotments, planters, street rain gardens etc. There is an opportunity to recognise this across the whole of Uttlesford.</p> <p>The Local Plan provide an opportunity to recognise and recommend new GI; and protect, improve and connect to existing GI networks. Whilst there are no statutory requirements for GI, the Government’s 25 Year Environment Plan and Environment Act (2021) place significant importance on protecting and enhancing GI, its accessibility and mandatory biodiversity net gain.</p>	<p>ECC recommends that the Local Plan include a brief landscape description (with a note to see Environment section for more details).</p> <p>Key opportunities for the Local Plan that can be included are –</p> <ul style="list-style-type: none"> • Facilitate urban greening; and enhancing and delivering multifunctional GI to deliver multiple environmental, economic and social benefits to people and wildlife. • Enhance and deliver links to the Greater Essex Local Nature Recovery Strategy.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>ECC is the ‘Responsible Authority’ for delivering the Greater Essex Local Nature Recovery Strategy (GELNR) but will work closely with the Local Nature Partnership to provide direction and ensure key stakeholders are engaged. The GELNRS is being prepared for completion by early 2024. The GELNRS will form the baseline for habitat information, which in turn will generate action to promote biodiversity management and improvement.</p>	
<p>Para 2.28 and 2.29</p> <p>Core Policy 4: Meeting Business and Employment Needs</p>	<p>GC / R</p>	<p>ECC notes that UDC’s Corporate Plan 2023-27 states that the Council will “Nurture employment and retail areas to create jobs and retain businesses”, including “Support the expansion and promotion of key relevant employment sectors for the district”. ECC acknowledges that UDC does not have an up-to-date Economic Strategy taking account of the Employment Needs Update 2023.</p> <p>ECC expects relevant planning policies in Local Plans (such as those for employment site allocations, or large scale strategic development sites and/or Garden Communities) to include the requirement for applicants, working collaboratively with Councils and other relevant stakeholders, to prepare an Economic and Employment Strategy, detailing a variety of measures aimed at fostering the conditions for economic activity and employment.</p> <p>The policies should make clear that development proposals will need to reflect this Strategy and demonstrate how a number of matters are achieved, including:</p> <ul style="list-style-type: none"> the provision of a mix of employment units that aligns with a clear sectoral strategy, meeting both occupier requirements and stimulating further demand, with a 	<p>ECC recommends that UDC seeks to update their Economic and Employment Strategy and ensure that it is consistent with emerging Local Plan policies and spatial strategy for growth and is aligned with a clear sectoral strategy.</p> <p>The policies should make clear that development proposals will need to reflect this Strategy and demonstrate how a number of matters are achieved, including:</p> <ul style="list-style-type: none"> the provision of a mix of employment units that aligns with a clear sectoral strategy, meeting both occupier requirements and stimulating further demand, with a range of unit sizes for both the primary employment uses and the associated supply chain, including affordable start-up accommodation, grow-on space (150-500sqm) for businesses that have outgrown their initial accommodation, as well as physical capacity for businesses to expand. how delivery is tied to occupation of housing to provide alignment between jobs and housing sustainable access to the employment opportunities, with as many commuting journeys as possible undertaken through walking, cycling and public transport.

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		<p>range of unit sizes for both the primary employment uses and the associated supply chain, including affordable start-up accommodation, grow-on space (150-500sqm) for businesses that have outgrown their initial accommodation, as well as physical capacity for businesses to expand.</p> <ul style="list-style-type: none"> • how delivery is tied to occupation of housing to provide alignment between jobs and housing • sustainable access to the employment opportunities, with as many commuting journeys as possible undertaken through walking, cycling and public transport. 	
Para 2.30	R	<p>London Stansted Airport</p> <p>ECC recommends that this section is strengthened, to show a full understanding of the economic contribution Stansted provides for the local, regional and national economy and explicit reference made to the Airport's role in UK cargo/air freight.</p> <p>Support is provided to the reference to Stansted Airport College. It is important to note that Stansted has been at the forefront of recognising the importance of having a skilled aviation sector. The Stansted Airport College (established in 2015) was the first purpose-built college at a UK airport.</p>	<p>ECC recommends that the paragraphs are amended to reference –</p> <ul style="list-style-type: none"> • Stansted Airport planning permission – facilitates airfield works to enable 274,000 aircraft movements (of which 16,000 movements may be Cargo Air Transport Movements) and a passenger throughput of 43 million per annum. • Stansted Airport as the third largest airport in the London system; • Stansted Airport has the busiest single terminal airport in the UK. • Following the pandemic the airport is now the fastest growing UK airport and expected to exceed pre-pandemic passenger throughput. <p>This section should highlight why Stansted is important for the economy, reflecting Stansted's role in the Essex and national economy, by enhancing connectivity, and the wider links to economic growth and development. It should be noted that London Stansted currently serves over 180 destinations across Europe, North Africa and the Middle East, providing connections to in excess of 30 countries. With capacity and planning permission to accommodate further growth in movements, passengers and routes. The airport plays a critical role in connecting the East of England to</p>

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			<p>the world, benefitting those that choose to live, work, visit and invest in the locality.</p> <p>Stansted is a driver for growth across Essex, the East of England and London, supporting jobs (over 12,000) and economic productivity (contributing (£1 billion annually to the national economy), and a key facilitator for the tourism sector. It is important to note that air tourist and air business travel spend is greater than sea, therefore airports are key facilitators for tourism and wider economic productivity.</p> <p>It is acknowledged that airports are key catalyst for wider economic growth and inward investment.</p> <p>The Local Plan should also reference Stansted's role in cargo air freight. The airport has planning permission for 16,000 cargo movements and is the UK's second largest cargo airport by weight. It is important that the Local Plan appreciates this role, and the matters that should be considered in the effective delivery of this role. The success of Stansted's cargo performance is due to its location as a gateway to London, the South East and the Midlands. Onward travel connections provided by the M11 and A120 ensure that cargo can be distributed throughout the UK via the road network. There are also excellent freight handling facilities on site at the World Cargo Centre and opportunities for further development. Such matters will also need to be reflected in any updated airport masterplan.</p>
Para 2.33	R	<p>Key Opportunities and Challenges</p> <p>It is considered the challenges and opportunities can be enhanced. It is important that the Local Plan shows an understanding of the impact that Stansted and aerodromes can have on the local community. These challenges may be articulated within the Stansted section or possibly the environment. But they should include noise, and air quality, these may also have impact on public health.</p>	<p>ECC recommends that further challenges and opportunities that must be considered include –</p> <ul style="list-style-type: none"> • Work with relevant partners to consider potential options for enlarging and diversifying the training offered within the Stansted Airport College to meet increasing skills and training demands. • Ongoing partnership working with Stansted, highways authorities and transport providers to assist in delivering surface access targets and delivering efficient active and sustainable modes.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
			<ul style="list-style-type: none"> It is recognised that Government is committed to all airport operations in England to be zero emission by 2040. Partnership working is essential to enhance the sustainable operations of our airports. <p>ECC recommends that challenges often experienced by the local community from proximity to aerodromes should be outlined within the Local Plan. These may be included within the environment section or as part of the reference to Stansted. The challenges should refer to addressing noise, air quality, safeguarding and the relationships with public health.</p>
Para 2.33	R	A key challenge and/or opportunity for the Local Plan is to ensure that at Chesterford Research Park access to sustainable and active modes of transport (including bus travel) is delivered. This will align with decarbonisation of transport and climate change principles set out within the Local Plan.	ECC recommends that the challenges for the Local Plan need to ensure that access to sustainable and active travel modes are promoted and facilitated at Chesterford Research Park. This will also seek to facilitate accessibility for all and equality of job opportunities throughout Uttlesford.
Paras 2.34 – 2.39	R	<p>Transport and Infrastructure (including Health)</p> <p>There is no reference to freight within the transport spatial portrait. See comments made under paragraph 2.30. Stansted is a key freight interchange and it is important that the spatial portrait and the Local Plan appropriately addresses the current and future challenges with freight within the district.</p> <p>UDC may wish to further expand this section to better reflect the full range of infrastructure issues and the challenges and opportunities. Viable infrastructure provision is a critical factor to ensure a sound local plan. It a</p>	<p>ECC recommends that the general text and the key challenges and opportunities appreciates the existing and future needs of freight, including air freight distribution.</p> <p>ECC recommends consideration should be given to expanding this section to better reflect the full range of infrastructure issues and the challenges and opportunities faced in Uttlesford district.</p>
Para 2.34	R	Within this paragraph there is reference to the Motorway 11 (M11) but it does not include the West Anglia main line. It is important to note that the transport corridor within the west of Essex includes M11, A120 and the West Anglia Mainline.	ECC recommends that the Local Plan includes reference to the West Anglian Mainline and National Highways as the highway authority for both the M11 and A120 east of M11 J8.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
Para 2.35	R	ECC notes that the Local Plan includes reference to the Air Quality Management Area (AQMA) at Saffron Walden. For clarity it is recommended that the wording within the Local Plan be amended.	ECC recommends that the text be amended to read – <i>“There are also challenges associated with the A120 and there is an Air Quality Management Area (AQMA) in Saffron Walden, although it is understood this no longer meets the <u>criteria to be designed</u> addressed and is expected to be removed in due course”.</i>
Para 2.36	R	Paragraph 2.36 cites the locations with rail access. It is important that there is acknowledgement that the nearest railway station for Saffron Walden is Audley End (Wendens Ambo). This should be stated in this paragraph.	It is recommended that the text be amended to ensure there is appreciation of proximity of rail access for existing and future residents, workers and visitors for Saffron Walden.
Para 2.37	R	Reference is made to car dependency/ownership and the extent that this is prevalent within UDC compared to the English and Essex average. ECC notes reference to car ownership being a ‘necessity’. It is considered that this text should be revised to ensure that there is an understanding that it reflects the public transport provision evident in UDC.	ECC recommends that the word ‘necessity’ is deleted and the sentence is amended to ensure there is an understanding that it reflects the public transport provision evident in UDC.
Para 2.38	R	ECC welcomes the reference to health within this paragraph, but it is recommended that the matters to be addressed are much greater and reference can be made to local evidence. The paragraph can be strengthened and reflect the objective of Core Policy 66 and broadened to link to the <u>Essex Joint Strategic Needs Assessment (JSNA)</u> and the Uttlesford Health and Well Being Strategy. The JSNA is a process through which local authorities and NHS organisations assess the current and future health, care and wellbeing needs of the local community to inform the decisions they make.	ECC recommends that this paragraph includes reference to relevant information from the JSNA such as the obesity profile, physical activity, educational attainment, income/deprivation etc as those have an impact on health.
Para 2.39	R	ECC considers that the “Key Opportunities and Challenges” should ensure consideration has been given to the Uttlesford Health and Well Being Strategy.	ECC recommends that a further bullet point be included to reflect the key challenges and opportunities in relation to overall health as established in the Uttlesford Health and Wellbeing Strategy.
Page 23	R	Bullet 3 – This challenge/opportunity needs to be rewritten as it is unclear what matter is seeking to be addressed.	Reword bullet 3 to ensure it is clear and concise.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
Challenges and Opportunities		Consideration should be given to the nature of each statement, to ensure that it is clearly understood.	
Page 23 Challenges and Opportunities	R	<p>Bullet 4 – ECC recommends that reference be given to the <u>Network Rail West Anglia Mainline Medium Term Study (2019)</u> and the opportunity provided by the Local Plan to support the case for future investment and delivery.</p> <p>The study seeks to inform medium-term investment choices for this strategically important rail corridor. The study provides and assessment of a number of Strategic Questions, the outputs determine the improvements that may be required on the corridor over the next 10-15 years.</p>	ECC recommends reference is given to the Medium Term Study (2019) and the opportunity/challenge re-written to reflect the opportunities for the draft Local Plan.
Para 2.40	R	ECC considers the Local Plan must identify the number of archaeological sites within the district a number of which will be impacted by the proposed allocations	ECC recommends the Local Plan be amended to ensure it demonstrates UDC contains over 3,700 listed buildings, and over 4,000 archaeological and other heritage assets.
Para 2.41	R	The Smiths Green Conservation Area (Takeley) has recently been designated.	Change text to “ <u>39</u> Conservation Areas”.
Para 2.42	R	It is considered the “Key opportunities and challenges” should be clearer. A Local Plan should set out a positive strategy for the conservation and enjoyment of the historic environment (NPPF para. 190). The bullet points set out in this paragraph do not emphasise the importance of conserving/enhancing the significance of heritage assets and their settings. They can positively shape and contribute to future development, but this is a challenge as much as an opportunity as the preservation of their settings and significance has to be an underlying principle. The bullet points refer to new development and incorporating historic buildings into new development, but this is not always appropriate.	Consider referring to the importance of understanding the significance of heritage assets, and their settings, and how this understanding must be taken into account in considering the position, scale and layout of new development. Consider emphasising that preserving the significance of heritage assets will contribute to and enhance local character and distinctiveness.
Paras 2.43 to 2.45	GC	ECC notes references to engagement, collaborative working and the duty to cooperate.	Refer to comments made earlier in this response on these matters.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
Chapter 3 – Spatial Vision			
Spatial Vision - Environmental	R	ECC notes that the current wording includes reference to 'Green Infrastructure'. It is important to note that 'multifunctional' green infrastructure recognises the wider functionality and multiple roles including for ecological, social and economic functions.	ECC recommends that to show an appreciation of the wider role that multifunctional green space plays the sentence is amended to read - <i>"...and together with <u>multifunctional</u> green infrastructure, contribute to a network of blue and green corridors for the benefit of people and wildlife".</i>
Spatial Vision - Environmental	GC / R	Spatial Vision Reference is made at the start of the Environmental section of the spatial vision to the 'beautiful rolling countryside' and the 'rich natural and cultural environment that gives the district its distinct character', but this it is not described in the spatial portrait in Section 2. (See proposed addition to Section 2 – Para 2.24-27, from the National Character Area study).	ECC recommends that in the environmental section of the vision in the discussion on 'development', the delivery of new homes and development can be directly linked to the creation and restoration of habitats, landscapes and green infrastructure, rather than keeping them separate items.
Spatial Vision – Economic	R	ECC considers that the spatial vision reference to Stansted from an economic perspective can be far stronger. It states, <i>"As the East of England's largest employment site, Stansted Airport will be supported but with great emphasis on ensuring its environmental impacts are managed and mitigated where they cannot be avoided"</i> . ECC considers that the significance of Stansted's role for the economy is wider than an employment site. It is important when developing the emerging Local Plan there is an appreciation of the airport's wider regional and national significance. Whilst Stansted is the East of England's largest employer, it is also a driver of jobs growth through direct and indirect	ECC recommends that in developing the Local Plan's spatial vision, it must show an appreciation of the wider economic role of the airport and link directly with the opportunities and challenges in the spatial portrait and then subsequent policies. See earlier comments on Stansted Airport. ECC also recommends there is an acknowledgement of the links with public health e.g. health impacts of noise exposure on human health.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>employment. Furthermore the airport provides connectivity. The route network and growth in routes facilitates trade links for businesses within the airport's catchment, supplying international connectivity that encourages foreign direct investment.</p> <p>ECC notes that unlike the spatial portrait the vision does show an appreciation of the need to manage the environmental impacts associated with Stansted airport. It is also recommended that there is acknowledgement of the links with public health.</p>	
Spatial Vision – Economic	R	<p>ECC considers that the current wording within the spatial vision should be strengthened. It states “the north of the district will benefit from appropriate improved links into the high-skilled ‘Cambridge phenomenon’, supporting economic growth at Chesterford Research Park and elsewhere.” It needs to be strengthened to show a broader understanding of Uttlesford’s strategic economic significance.</p>	<p>ECC recommends that the spatial economic vision be redrafted. The terminology used, namely ‘Cambridge phenomena’, is questioned. The clustering evident by the biotechnology industry is an attribute of the sector, and the implication for its growth is stretching beyond Cambridge. Industry locating within Essex is increasingly evident.</p> <p>It is recommended that the Local Plan highlight the importance of proximity to Cambridge. The supporting text must show an understanding of why the sector develops in clusters. Namely, due to (but not limited to); experiences economies of scale, and to promote the efficient of exchange of ideas and knowledge.</p> <p>It is also important to note that that connections within the south of the district play a key role for the wider biotechnology and research and development sector growth and development. Most notably proximity to international airports – London Stansted Airport - is a key driver for future investment. The potential for future route connections and the growth potential offered by Stansted is a key factor of firms investing within Uttlesford and the wider eastern region. It is important that the Local Plan fully appreciates the locational strategic significance to ensure the full economic growth and development potential is capitalised.</p>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
Para 3.4 Strategic Objective SO1	R	SO1 – ECC recommends that the objective be amended to ensure development is located and designed to minimise environmental impact, particularly with reference to the environmental sustainability of transport.	ECC recommends that SO1 text be amended to ensure that it is clear the Local Plan is seeking to ensure <i><u>‘development is located and designed to minimise environmental impact’</u></i> .
Para 3. 4 Strategic Objective SO3	R	SO3: The interconnectivity of natural environment, flood protection and water management, outdoor sport and open space, and public realm is an important part of the Green and Blue Infrastructure (GBI) network. Mitigate the potential fragmentation from developments, but also showcase developments as potential steppingstone/connectors. The right design and location, wide range of functions and benefits of GBI can fulfil people and wildlife, the interactions should be emphasised i.e. <ul style="list-style-type: none"> • Every effort needs to be made to ensure that connections between green spaces, local amenities and developments are achieved to ensure that routes make sustainable connections and are attractive through the delivery of GI for the benefit of the new community and existing communities. • ECC recommends including ‘improvements or greening the public realm (i.e., street trees, dual purpose street furniture with planters, rain gardens etc)’. 	ECC recommends that SO3 be amended to read – <i>“Protect, <u>connect</u> and maximise opportunities for Biodiversity net gain and the enhancement”</i> Or add – <i>“Protect and provide more, better and joined up natural habitats”.</i> Also ECC recommends inserting <i>“multifunctional Green and Blue Infrastructure”</i> .
Para 3.4 Strategic Objective SO6	R	SO6: The setting of heritage assets and archaeology needs to be considered within this strategic objective of protecting the historic environment.	ECC recommends that SO6 is amended to read <i>“...enhancing heritage assets, and archaeology and their setting”</i> .
Para 3.4 Strategic Objectives S09 and S011	R	Every effort needs to be made to ensure that connections between green spaces, local amenities and developments are achieved to ensure that routes make sustainable connections and are attractive through the delivery of GI for the benefit of the new community and existing communities.	ECC recommends that the objectives be amended to read - <i>“S09: Help sustain existing and deliver new local community facilities and services through the development to promote health, <u>attractive</u>, sustainable and safe communities”.</i>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		The Local Plan supports and encourages opportunities to enhance and establish green infrastructure along sustainable transport and ProW networks to both encourage active travel and create a green corridor for wildlife. This could include, but not be limited to the integration of nature focused SuDS; native hedgerows, tree and shrub planting; incidental 'play on the way' features / trails; informal sport (outdoor gym/fitness trails); and areas for seating to stop and rest.	<i>"S011: Prioritise increased opportunities for attractive and safe travel by public transport and active travel in new developments".</i>
Para 3.4 Strategic Objective S011	R	SO11. ECC welcomes this objective, however it should be expanded. Local Plans must provide a clear understanding as to how the transition to a net zero transport system, that is fully sustainable, will be enabled.	It is recommended that UDC discuss with ECC the precise wording of this objective to ensure that it is less mode specific and aligned with strategic outcomes related to the delivery of a fully sustainable transport system in its widest sense.
Table 3.1	R	There is no reference to "significance" or "setting" which are key terms in the NPPF.	ECC recommends additional wording to refer to ' <i>protecting and enhancing the significance of heritage assets and their settings, including archaeology</i> '.
Chapter 4 – Spatial Strategy			
Para 4.3	S	ECC strongly supports the inclusion of a Core Strategic Policy addressing Climate Change. This will help ensure that mitigating and adapting to a changing climate is embedded across the whole plan.	Note support.
Page 30 Spatial Strategy Table – first row	GC / R	Reference is made to "additional capacity at the existing secondary school". Further scenario testing is required to ensure there is a deliverable and viable option.	Refer to comments made to Para 5.11. Further discussions are required on this matter.
Page 30 Spatial Strategy Table – second row	GC	Fourth bullet - ECC considers that any future growth proposed at Takeley must deliver feasible sustainable connections. Evidence to date suggests that an RTS between Takeley and Stansted is not viable.	ECC recommends further discussions with ECC as the Highways and Transportation Authority on deliverability of sustainable connections at Takeley.
Page 31	O	ECC notes that within Figure 4.1 there is reference to development in Thaxted including <i>"new services and facilities will also be provided including a new primary</i>	ECC object to housing allocations as it will not support viable school provision and recommends that UDC remove the housing allocations from Thaxted, and reference to providing a new primary school as it is not viable.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
Spatial Strategy Table - Thaxted		<i>school</i> ". ECC have had a number of discussions through the Duty to Cooperate, where ECC have provided UDC with guidance highlighting our role as the lead authority for Education. During these meetings and from information exchanged, ECC have clearly highlighted that given the scale of growth proposed within Thaxted a new primary school is unlikely to be viable and will not be provided. It is on this basis that ECC must object to this proposal.	
Page 31 Spatial Strategy Table – first row	GC / R	ECC notes reference to improvement to Flitch Way. It is important to note that these are difficult to achieve due to environmental constraints. There is a concern that this may not be a viable strategic sustainable transport connection.	ECC recommends that evidence be demonstrated to highlight that the improvements are viable as a strategic sustainable transport connection.
Para 4.7 and Para 4.14	GC / R	ECC notes that UDC declared a climate and ecological emergency in 2019. With this in mind it is important that the Local Plan fully appreciates the scale of impact it may have on the influencing and shaping the future climate crisis experienced. In particular the nature of the spatial strategy, where it is noted that within this paragraph there is no reference to how the location and design of new development can influence long term sustainability – inclusive of transport sustainability (para 4.14).	ECC recommends that sustainable and active travel are maximised for all new development proposals and further discussions take place with ECC as the Highways and Transportation Authority to ensure this is reflected in the evidence and specific site allocation policies to ensure all aspects of the plan contribute to addressing climate change.
Para 4.8	GC / R	ECC notes that this paragraph cites some of the key measures to achieve net zero. It is noted that within the list there is reference to 'electrification of small vehicles'. Whilst this is an important component of decarbonation of transport, it is not the only relevant component for the decarbonisation of the transport system by 2050. To assist UDC in determining the key components of net zero and the decarbonisation of transport ECC draws attention to relevant national policy with regards to net zero and decarbonisation of transport –	ECC recommends that the Local Plan and this section ensures that a broader range of interventions to support the delivery of net zero transport are articulated and supported by future Local Plan policy. It is also recommended that in considering the decarbonisation of transport that further consideration is given to Future of Flight technology and the role that will play within the lifetime of this Local Plan.

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		<ul style="list-style-type: none"> • The 2018 <u>Road to Zero</u>, the Government’s carbon reduction strategy for road transport • <u>Transport Decarbonisation Plan (2021)</u>. <p>ECC would also draw attention to the future of flight technologies. The Government and Industry recognise that future flight technologies, such as Advanced Air Mobility and drones, have the potential to transform how people connect, transport goods, and deliver services. There is an appreciation that to realise these opportunities, the future flight community must work with the people and places these services will support.</p> <p>The Government published the <u>Aviation Strategy Flight Path to the Future</u> in May 2022, which highlighted a commitment and determination by Government to ensure that the UK remained at the leading edge of aviation technological development. The Aviation Strategy highlighted that the UK would “be one of the first countries in the world to routinely use new aircraft to provide new and improved low carbon services, and local and regional air mobility for goods and people. This will include aircraft such as drones and electrical vertical take-off and landing aircraft” (DfT, 2022, 10).</p>	
Para 4.9	S / R	The requirement of net zero carbon and ultra-low energy is supported.	ECC recommends that the Local Plan ensures this standard must be across all homes, as reduced heating costs prevents fuel poverty and enables the household to have more financial security.
Para 4.10	S / R	ECC fully support the need for local plan policy to go beyond Building Regulations and require higher standards necessary to deliver development that achieves net zero carbon (in operation) emissions. The technical justification for this is	<p>ECC recommends references are made to the Net Zero Evidence published on the Essex Design Guide website as follows:</p> <ul style="list-style-type: none"> • Technical evidence base - Link to Report 1: <u>Report 1 Essex Net Zero Policy - technical evidence base</u> - which is on this web page:

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>set out in Report 1 of the Essex Net Zero Policy Study – Technical Evidence Base published on the Essex Design Guide website.</p> <p>This paragraph could be strengthened further by making reference to the open legal advice that is published on the Essex Design Guide – it confirms that setting local plan policy requiring better energy performance standards than the national baseline (i.e. Building Regulations) is legally justified.</p>	<p>Essex Net Zero Policy Study Essex Design Guide</p> <ul style="list-style-type: none"> Open legal advice - Link directly to document is here: essex-open-legal-advice-energy-policy-and-building-regulations.pdf (essexdesignguide.co.uk) - which is on this page: Essex Open Legal Advice – Energy Policy and Building Regulations Essex Design Guide
Para 4.11	S	This is an excellent paragraph which clearly outlines what is required in terms of net zero carbon in operation, and also brings in the need to tackle embodied carbon emissions.	Note support.
Para 4.11	GC / R	ECC appreciates the wider role that multifunctional GI can play for adaption and mitigation to climate change. It can mitigate the impacts of the urban heat island, air pollution, improve energy efficiency providing shading, thermal regulations via green roofs, and the expansion of greening in urban planning may enhance sustainability and resilience for communities.	ECC recommends that the paragraph be amended to include reference to the implementation and design of “multifunction GI and landscaping for adaptation and mitigation to climate change”.
Para 4.12	S / R	The paragraph refers to the UDC’s climate emergency declaration. If a target has been identified it would be useful to refer to it in this paragraph, and also the Essex Climate Action Commission recommended targets relating to the Built Environment as these are relevant too. This would then support the suggested amendment (below) to strengthen Policy 1 – by referring to local (as well as national) targets in the policy.	ECC recommends that references are added to UDC climate target, and also ECAC Built Environment targets.
Para 4.13	R	Mandatory Net Gain is imminent and the wording in this paragraph will need strengthening.	ECC recommends that the paragraph is reviewed and strengthened to reflect mandatory biodiversity net gain requirements.

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		<p>An Essex Biodiversity Net Gain (BNG) <u>Guidance Pack has been produced and</u> provides an overview of the facts and guidance on BNG to date. ECC supports the requirement for net gain to preferably be on-site and if this is not achievable off-site with deliverability needing to be evidenced. ECC/Local Nature Partnership (LNP) is presently investigating the approach of seeking developers who cannot deliver the necessary biodiversity requirements on site, due to site constraints, the opportunity to purchase biodiversity credits that can be used to provide additional biodiversity benefits to specific locations on ECC land. A statutory biodiversity credits scheme, in accordance with the Act, is being established through developing a biodiversity credit investment pipeline and payment structures to fund habitat provision.</p> <p>Defra published the current timetable for the implementation of BNG in September 2023 and can be viewed <u>here</u>. The key milestones are for developers:</p> <ul style="list-style-type: none"> • major developments in England will be required to deliver 10% Biodiversity Net Gain from January 2024; • Biodiversity Net Gain for small sites will be applicable from April 2024; and • implementation for Nationally Significant Infrastructure Projects is planned for 2025. 	<p>ECC recommends paragraph 4.13 makes reference to the preference for on-site biodiversity net gain prior to off-site provision. The Essex Local Nature Partnership is progressing work on this matter.</p>
Para 4.15	S	<p>ECC is very supportive of the holistic approach to climate change and sustainability which is facilitated through the requirement for applicants to submit a Climate Change and Sustainability Statement.</p>	<p>Note support.</p>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
Para 4.15	GC / R	<p>ECC notes that the information presented within Table 4.1 provides a general overview of the passenger transport/sustainable travel provision within UDC's four "areas" of the Local Plan. It is recommended that in developing the Local Plan there is an appreciation of the accessibility these key locations/centres have to employment sites, centres, education/skills and training facilities located within and in some cases outside of the Uttlesford. Furthermore the quality of public transport availability from these key locations should be referred to as this would ensure there is an appreciation of how sustainable the emerging spatial strategy is for Uttlesford.</p>	<p>ECC recommends there is an understanding of the quality of public transport network provision, especially at locations for future planned residential and/or employment growth throughout the Uttlesford.</p>
Para 4.15	R	<p>The list seems to be a repeat of the Table 4.1.</p> <p>The 'Note' sentence clarifies that operational energy sits in the Energy Strategy requirement of Net Zero Policy 23 – however, ECC would recommend that high level energy information is drawn into the Statement (i.e. key commitments / principles relating to energy supply, use, storage and summary figures for predicted energy demand and renewable energy generation) from the detailed information contained in the energy strategy / net zero spreadsheet (depending on scale of development). This is necessary to ensure and reinforce the holistic approach to climate change and sustainability.</p> <p>Applicants could be given the option to integrate their Energy Strategies into their Climate Change and Sustainability Statements (noted that this option is given in para 9.24 and therefore should also be clarified in para 4.15).</p>	<p>ECC suggest that it would be clearer to just have the requirements set out in Table 4.1 and not repeated in 4.15 list.</p> <p>ECC recommends that the 'Note' sentence is amended to explain that Energy is included as a topic in the Table 4.1 list (see comment below) but this is clarified as only drawing in high level summary information from the Energy Strategy / Net Zero Spreadsheet (in accordance with Policy 23) in order to ensure it is considered in the round with the other topics. The alternative option of integrating the Energy Strategy into the Climate Change and Sustainability Statement as set out in 9.24 should be referred to as well.</p>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
Para 4.15	R	<p>ECC notes that UDC acknowledges that we are in a climate emergency. It is appreciated that the risks from flooding are projected to double across Essex in the next 30 years, with increasing rain storms and drought. This matter is referenced and outlined within the ECAC report, Essex Water Strategy (draft to be published early 2024) and the Essex Design Guide. It is important that the supporting text for the principle climate change policy in the Local Plan references flood risk mitigation.</p>	<p>ECC recommends that reference is made to flood risk mitigation and resilience.</p>
Table 4.1	R	<p>The table lists the topics that should be included in a Climate Change and Sustainability Statement.</p> <p>“Carbon emissions” and “Energy” should be included in the topic list.</p> <p>See comments above for paragraph 4.15 regarding Energy and including high level energy information / key principles from the Energy Strategy into the Climate Change and Sustainability Statement to ensure the energy strategy is aligned with the climate change and sustainability statement and to retain the holistic approach.</p> <p>Information on carbon emissions from a development proposal should be included proportionate to the scale of the development. For major developments, this should cover both operational and embodied carbon emissions – preferably using a nationally recognised methodology for assessing the whole life carbon impact of a development, (which at present is the <u>RICS Professional Statement on WLC Assessment</u>). Measures should demonstrate how emissions have been minimised and quantified where possible.</p>	<p>ECC recommends the inclusion of additional topics into the Table:</p> <ul style="list-style-type: none"> • Whole life carbon emissions (operational and embodied) • Energy (supply, storage, use and renewable energy generation)

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
Table 4.1	R	<p>ECC has reviewed the content of the information presented in the table, and it is considered the transport interventions are too narrow in scope. See comment to para 4.7 for further justification.</p> <p>ECC acknowledges the important role of determining a spatial strategy that maximises active travel modes to schools and consider the precise locational qualities needed to deliver an effective and sustainable pattern of future residential development.</p>	<p>ECC recommends that this explanatory table must include a broader range of interventions to support the delivery of net zero transport. It is also recommended that the running order of the table should reflect the planning authority's priorities for addressing climate change and sustainability. With that in mind transport interventions should be a top priority.</p> <p>As also outlined, the table should refer to locational qualities for schools, to promote and facilitate active travel modes to and from school.</p>
Table 4.1	R	<p>Topics for climate change and sustainability statement should include "health and wellbeing, open space, culture and accessibility"</p>	<p>ECC recommends health and wellbeing objectives should have consideration for those living in affordable rented homes, as well as those who are vulnerable, living in supported or specialist housing. The objectives should include equal access to green space, children's play equipment, social amenities, and transport hubs.</p>
Core Policy 1: Addressing Climate Change	S	<p>ECC strongly supports the inclusion of an overarching policy to address climate change, which then links to a suite of detailed Policies that tackle specific issues.</p> <p>Support the requirement for a Climate Change and Sustainability Statement.</p>	Note support.
Core Policy 1: Addressing Climate Change	S / R	<p>ECC welcomes that Core Policy 1 includes bullet point X regarding promoting and maintaining a network of connected, accessible and multifunction green spaces and to enhance biodiversity and nature recovery.</p> <p>ECC understands the wider role that multifunctional GI can play in climate change adaptation and mitigation. It is important that the Local Plan promotes and facilitates this.</p>	ECC recommends that bullet point X be enhanced to include reference to the use of "multifunctional GI to address mitigation and adaptation measures, and consideration given to resilient planting".
Core Policy 1: Addressing Climate Change	S / R	<p>ECC recommends that the policy be amended to promote active travel modes.</p>	Amend Core Policy 1 (I) to promote the use of walking and cycling to read:

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
			i. <i>“Locating and laying out development to reduce the need to travel, <u>preferably by walking and cycling</u>, by clustering trip origins and destinations between homes, jobs, services”.</i>
Core Policy 1 – Climate Change	R	<p>The wording ‘overall reduction in greenhouse gas emissions’ could mean that only a minimal reduction is achieved. To achieve climate targets, there needs to be radical reductions in greenhouse gas emissions (as per the NPPF). It is also useful to link in the need for development proposals to contribute to achieving local and national climate objectives and targets. In terms of local, this would relate to UDC’s Climate Emergency declaration and also the Essex Climate Action Commission targets set out in the <u>‘Making Essex Carbon Neutral’ 2021 report</u>.</p> <p>The Policy wording only relates to the mitigation of impacts of climate change. New Development must also demonstrate resilience and adaptation to a changing climate.</p> <p>Clause iv refers to sustainable design and construction – but it does not cross reference the Core Policy 23 and 33. This appears to be an omission.</p>	<p>ECC recommends that the policy is rephrased as follows:</p> <p><i><u>‘Development proposals must demonstrate how they will mitigate, adapt and be resilient to a changing climate, support radical reductions in greenhouse gas emissions and contribute to achieving local and national climate targets, including...’</u></i></p> <p>It is suggested that a cross reference to policies 23 and 33 is added to clause iv – sustainable design and construction.</p> <p>It is suggested that it would provide clarity up front in the local plan if Core Policy 1 set the principles that development must be fossil fuel free and achieve net zero carbon (in operation) emissions.</p>
Core Policy 2: Meeting Our Housing Needs	R	<p>Further discussions are sought on the spatial strategy, certain growth locations and site allocations to ensure the distribution and quantum of growth across the district and its location in key settlements can viably support the required infrastructure. ECC needs to ensure new development fully supports education provision and does not result in a cost burden to ECC; and maximises opportunities for sustainable and active travel.</p>	<p>Note comments and address as part of ongoing duty to cooperate discussions with ECC.</p>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>ECC understands that UDC will review and update housing commitments and this is likely to influence the location and quantum of development proposed in the Submission Plan.</p> <p>There is also a need for the DULP (and transport modelling) to include the appeal decision at East of Highwood Quarry Great Dunmow (1,200 dwellings) (and others), which is a significant change to both the quantum, and the distribution of growth in the district.</p> <p>ECC would also like to further understand the implications of the 1,000 homes proposed on non-strategic sites that are yet to be identified by Parish Councils in Neighbourhood Plans in order to ensure greater certainty on specific locations within the identified Larger Villages, infrastructure provision and funding.</p>	
Para 4.30	GC / R	<p>Meeting Business and Employment Needs</p> <p>The Local Plan needs to acknowledge Stansted Airport's cargo role. Stansted Airport has planning permission (reference UTT/18/0460/FUL) that was granted on appeal, to allow airfield works enabling 274,000 aircraft movements (of which 16,000 movements may be <u>Cargo Air Transport Movements</u>) and a passenger throughput of 43 million per annum.</p> <p>It is also important to note that recent estimations for passenger throughput at Stansted have shown that in the past 12 months from August 2023, the airport has served more than 27 million passengers. There is capacity for growth, and it is the fastest recovering UK airport at present.</p>	ECC recommends that it is important within the spatial strategy that there is reference to the current planning permission, including an appreciation of the cargo movements at the airport. Furthermore it is also recommended that there is an understanding of the available passenger capacity at London Stansted airport, to demonstrate the growth expected throughout the plan period.
4.31 & 4.35	R	Re-iterate comments from para 2.33.	See comments from para 2.33 as this is applicable here.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
Core Policy 4: Meeting Business and Employment Needs	GC / R	<p>ECC notes that Thaxted is in receipt of nearly 500 units in strategic housing allocations. However, there is no additional local employment allocation.</p> <p>Consideration should be given to the needs of start-ups, and businesses that have outgrown their initial accommodation, rather than a focus on larger premises.</p>	ECC recommends that further consideration be given to the location of employment locations for new communities proposed within Thaxted.
<p>Para 4.41</p> <p>Core Policy 5: Providing Support Infrastructure and Services</p>	R	<p>Providing Supporting Infrastructure and Services</p> <p>ECC notes that within this section of the Local Plan UDC is seeking to set out UDC's approach to infrastructure planning. ECC considers that the current wording may lead to confusion. It is important to note that UDC are not the responsible body for all the infrastructure listed and therefore refer/emphasise its role in facilitating and supporting delivery.</p> <p>ECC will work with UDC as and when it prepares a Developer Contributions SPD. It must be noted and clearly conveyed that such SPD must signpost guidance issued by the appropriate authority/infrastructure provider rather than repeating it to minimise loopholes or conflicting advice.</p> <p>ECC has articulated at the outset of the response our statutory functions and responsibilities. These must be noted.</p>	<p>ECC recommends that this section and the associated Core Policy 5 be reviewed, and wording amended to ensure that there is a clear understanding of the statutory roles and responsibilities for the County Council. As a minimum in relation to ECC duties, refer to '<i>facilitating</i>' or '<i>supporting</i>' the delivery of essential infrastructure rather than '<i>providing</i>'.</p> <p>The first bullet should mention Essex County Council.</p>
<p>Para 4.40 – 4.50</p> <p>Core Policy 5: Providing Support Infrastructure and Services</p>	GC / R	<p>It is important that UDC notes that ECC has no formal responsibilities to promote digital connectivity. Instead, we have taken a voluntary but very proactive stance to enable much fuller coverage and better mobile and fixed technology across Essex working primarily through our ongoing <u>Superfast Essex</u> initiative. This has been updated and rebranded to the newer '<u>Digital Essex</u>' identity.</p>	ECC recommends that UDC commence discussion with ECC to ensure there is an understanding of whether consideration has been given to any potential Communication Infrastructure requirements to support future Mobile connectivity across the district as a result of increased capacity demand on the Mobile service due to the new housing developments. Specifically looking at identifying potential new sites in collaboration with

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		<p>There is also a wealth of information readily available and easily accessible via the Superfast Essex and Digital Essex websites, such as:</p> <ul style="list-style-type: none"> • Future ECC plans on what it plans to achieve around digital connectivity. • The Digital Strategy for Essex • Mobile (4G and 5G) connectivity across Essex • Broadband deals for households on low incomes • Future digital connectivity rollout plans • Digital Inclusion <p>In June 2022 ECC published its own first Digital Strategy as a focal / reference point for how digital connectivity is to be promoted and improved across Essex and to help promote and improve life in the county. The strategy makes clear the importance of co-ordinated work across the public sector in the spirit of shared strategic principles to realise our ambitions successfully. A key, headline objective is to ensure that, by 2025, every property in Essex can access a 4G or 5G mobile signal, as well as superfast fixed broadband.</p> <p>Our shared goals across the public sector focus on economic prosperity, health and wellbeing, public safety and security. The strategic principles to guide our collaborative work are:</p> <ul style="list-style-type: none"> • Digital technology is part of everything we do. • Demand drives infrastructure deployment • We champion digital inclusion and adoption. • Collaboration with the private sector will boost business adoption. • Active engagement with government 	<p>Mobile Network Operators to support communication masts and infrastructure near large developments. Designing such sites to avoid impinging on the communities and minimise the impact on the appearance and character of the local area?</p>

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		<ul style="list-style-type: none"> The Essex public sector speaks with one voice. <p>The specific Infrastructure Delivery Targets are as follows. By the end of 2025 we will see:</p> <ul style="list-style-type: none"> Superfast speeds available at all premises in Essex Gigabit-capable services available at more than 85% of premises in Essex 4G services available at over 99% of the Essex geography 5G services available at all key employment locations and in identified priority areas. 	
Para 4.42	R	Reference should be made to “active travel”.	<p>ECC recommends that the final sentence be amended to read:</p> <p><i>“Examples of essential infrastructure associated with developments are <u>active travel</u>, roads, public transport improvements, schools, and foul water upgrades”.</i></p>
Para 4.48 to 4.50	S / R	<p>ECC supports UDC adopting CIL and will provide necessary support as a Charging Schedule is prepared.</p> <p>However, ECC notes that the suggestion in the penultimate paragraph that anything not in CIL will be works in kind, which appears to leave no room for land or financial contributions through s106. ECC recommends that education is best delivered outside of CIL</p>	Note support and ECC recommends that the policy as worded be amended to ensure that land and certain financial contributions will still be secured via s106. See below.
Core Policy 5: Providing Support Infrastructure and Services	R	<p>ECC supports a policy in the local plan seeking contributions to infrastructure. However amendments are sought which would bring the policy in line with other adopted Essex local plans.</p> <p>ECC appreciates that planning and delivering the required infrastructure to support new development is at the heart of sustainable development. The provision of appropriate</p>	<p>ECC recommended the following policy wording is used which has been found sound in recently adopted Essex local plans and ‘made’ neighbourhood plans.</p> <p><i>POLICY: INFRASTRUCTURE DELIVERY AND IMPACT MITIGATION</i></p>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>and timely local and strategic infrastructure is necessary to ensure the needs of current and future communities are met. Infrastructure is central to the delivery of new development and the planning process provides the opportunity to address infrastructure needs, maximise the efficient use of existing infrastructure capacities and where required, explore opportunities for new sustainable infrastructure.</p> <p>ECC has a statutory duty to provide necessary infrastructure across the administrative area. This means ECC may request financial contributions and/or land towards:</p> <ul style="list-style-type: none"> • Early Years and Childcare (EYCC) • Primary and Secondary Education • Special Education and Disability Needs (SEND) • Post 16 Provision • Employment and Skills • Highways • Travel Planning • Waste and recycling • Flood and water management / Sustainable Drainage Systems • Libraries <p>ECC has produced the <u>ECC Developers' Guide to Infrastructure Contributions</u> (updated in November 2023) which details the range of contributions towards infrastructure ECC may request from developers and landowners to mitigate the impact of development. The Guide may assist LPAs in producing Local Plans and supporting evidence they require. ECC seeks to ensure that</p>	<p><i>“Proposals for any development must demonstrate that the required infrastructure to support the development will be delivered in a timely and, where appropriate, phased manner.</i></p> <p><i>Permission will only be granted if it can be demonstrated that there is sufficient appropriate infrastructure capacity to support the development or that such capacity will be delivered by the proposal. It must further be demonstrated that such capacity as is required will prove sustainable over time both in physical and financial terms.</i></p> <p><i>Developers will need to make direct provision or contribute towards the delivery of relevant infrastructure as required by the development either alone or cumulatively with other developments, as set out in the relevant Infrastructure Delivery Plan and other policies in this Plan, where such contributions are compliant with national policy and the legal tests. Where necessary, developers will be required to:</i></p> <ol style="list-style-type: none"> <i>1. enter into Section 106 agreements to make provisions to mitigate the impacts of the development where necessary or appropriate. Section 106 will remain the appropriate mechanism for securing land and works along with financial contributions where a sum for the necessary infrastructure is not secured via CIL; and/or</i> <i>2. make a proportionate contribution on a retrospective basis towards such infrastructure as may have been forward funded from other sources where the provision of that infrastructure is necessary to facilitate and/or minimise the impacts of their development (including the cumulative impacts of planned development).</i> <p><i>Where a proposal requires additional infrastructure capacity, to be deemed acceptable, mitigation measures must be agreed with the Councils and the appropriate infrastructure provider. Such measures may include (not exclusively);</i></p>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>infrastructure is delivered in a timely manner, minimising any adverse impact on existing communities and ensuring new developments fairly addresses their own infrastructure needs.</p> <p><u>Infrastructure Funding</u> The key sources of funding over which the planning system can have a direct influence are:</p> <ul style="list-style-type: none"> • Section 106 Agreements – these are limited to those matters that are directly related to a specific site, and which accord with CIL Regulation 122, whereby the obligation is necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonable related in scale and kind to the development; • Planning Agreements – these are the main mechanisms for the provision of essential on-site design requirements and critical infrastructure. These could include highway infrastructure agreements, mainly those covered by Section 38 and Section 278 of the Highways Act 1980 which provide discretionary powers for the highway authority to enter into an agreement with a developer to adopt a new highway or improve the existing highway. This is the ECC preferred approach for delivering site related highway infrastructure; and • Community Infrastructure Levy (CIL) – is a planning charge which acts as a tool for local authorities in England and Wales to help deliver infrastructure to support the sustainable development of an area. In 	<ul style="list-style-type: none"> • <i>financial contributions towards new or expanded facilities and the maintenance thereof;</i> • <i>on-site provision of new facilities (which may include building works);</i> • <i>off-site capacity improvement works; and/or</i> • <i>the provision of land.</i> <p><i>Developers must work positively with the Councils and other infrastructure providers throughout the planning process to ensure that the cumulative impact of development is considered and then mitigated, at the appropriate time, in line with their published policies and guidance.</i></p> <p><i>The Councils will consider introducing a Community Infrastructure Levy (CIL) and will implement such for areas and/or development types where a viable charging schedule would best mitigate the impacts of growth. Section 106 will remain the appropriate mechanism for securing land and works along with financial contributions where a sum for the necessary infrastructure is not secured via CIL.</i></p> <p><i>Where the applicant is seeking an exception to this policy, it will only be considered by the Council whereby:</i></p> <ul style="list-style-type: none"> • <i>A fully transparent open book viability assessment has proven that full mitigation cannot be afforded, allowing only for the minimum level of developer profit and landowner receipt necessary for the development to proceed.</i> • <i>It is proven that the benefit of the development proceeding without full mitigation outweighs the collective harm.</i> • <i>Full and thorough investigation has been undertaken to find innovative solutions to issues and all possible steps have been taken to minimise the residual level of unmitigated impacts and obligations are entered into by the developer that provide for appropriate additional mitigation</i>

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		<p>Essex, CIL has only been adopted by Chelmsford City Council and Castle Point Borough Council.</p> <p>ECC can assist UDC in redrafting the policy. Refer to our recommendation.</p>	<p><i>in the event that viability improves prior to completion of the development.</i></p> <p><i>For the purposes of this policy the widest reasonable definition of infrastructure and infrastructure providers will be applied. Exemplar types of infrastructure are provided below and should be included in a glossary appended to the Plan.</i></p> <p>The following is the recommended definition of “infrastructure” for inclusion in the Plan’s glossary.</p> <p><i>Infrastructure - Infrastructure means any structure, building, system, facility and/or provision required by an area for its social and/or economic function and/or well-being including (but not exclusively): footways, cycleways and highways; public transport; drainage and flood protection; waste recycling facilities; education and childcare; healthcare; sports, leisure and recreation facilities; community and social facilities; cultural facilities; emergency services; green infrastructure; open space; affordable housing; broadband; facilities for specific sections of the community such as youth or the elderly.”</i></p>
<p>Chapter 5 – North Uttlesford Area Strategy See paragraph 3.11 for a summary of ECC’s response.</p>			
Chapter 5 – North Uttlesford Area Strategy/Site Development Templates, Appendix 2 – North Uttlesford Site Development Templates, Site	R	<p>ECC, as the Mineral and Waste Planning Authority, has assessed the site allocations identified in the ‘Site Templates’ document against policy requirements in the Essex Mineral Local Plan (MLP) Policy S8 – Safeguarding mineral resources and mineral reserves, and the Essex and Southend-on-Sea Waste Local Plan (WLP) Policy 2 - Safeguarding Waste Management Sites and Infrastructure.</p> <p>The assessment identifies whether any proposed allocated site in the Draft Uttlesford Local Plan is located within a Mineral Safeguarding Area (MSA), Mineral Consultation</p>	<p>ECC as the MWPA require the following additional wording to be incorporated into the ‘Site Template’ (pages 11 – 15) for this allocation:</p> <ul style="list-style-type: none"> • <u>Undertake a Minerals Resource Assessment</u> • <u>Undertake a Waste Infrastructure Assessment given its proximity to Saffron Walden Recycling Centre for Household Waste</u> • <u>Liaise with ECC as the Minerals and Waste Planning Authority on mineral and waste matters.</u>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
1, A and 2 - Land South of Radwinter Road and North of Thaxted Road (845 homes)		<p>Area (MCA) and/or Waste Consultation Area (WCA) and the any potential individual and collective impacts of the Uttlesford local plan sites on mineral and waste matters.</p> <p>Uttlesford DC will need to work with ECC to ensure high-level scoping and assessment of potential Local Plan sites, and any subsequent detailed assessments with regards to the individual and collective impacts of potential sites located in MSAs and MCAs and WCAs, subject to policies MLP S5, S8, S9 and WLP policy 2.</p> <p>The site is located within a MSA for chalk, is more than 3 hectares in scale (a 100m buffer has been applied around nearby residential properties) and thereby <u>requires a Mineral Resource Assessment</u> (MRA) to be undertaken by the applicant (in consultation with the MWPA) in accordance with MLP Policy S8 - Safeguarding mineral resources and mineral reserves. The MRA will help establish the practicality and environmental feasibility of the prior extraction of mineral such that the resource is not sterilised. The scope of the MRA will need to be agreed with ECC as the MWPA. If necessary, the MWPA may require prior extraction of minerals resource, and the timing and delivery of this would need to be taken into account by the LPA, especially in relation to site phasing and delivery.</p> <p>The site is also located within 400m of a WCA with regards Saffron Walden Recycling Centre for Household Waste (RCHW) and therefore ECC as the Waste Planning Authority (WPA) is required to be consulted. A Waste Infrastructure Impact Assessment would be required to support site selection for proposals within WCA's, to ensure the</p>	

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		continued and future operation of the waste infrastructure would not be compromised.	
Chapter 5 – North Uttlesford Area Strategy/Site Development Templates, Appendix 2 – North Uttlesford Site Development Templates, <u>Site 4 – South of Wicken Road/West of Frambury Lane (338 homes)</u>	R	<p>ECC, as the Mineral and Waste Planning Authority, has assessed the site allocations identified in the ‘Site Templates’ document against policy requirements in the Essex Mineral Local Plan (MLP) Policy S8 – Safeguarding mineral resources and mineral reserves, and the Essex and Southend-on-Sea Waste Local Plan (WLP) Policy 2 - Safeguarding Waste Management Sites and Infrastructure.</p> <p>The assessment identifies whether any proposed allocated site in the Draft Uttlesford Local Plan is located within a Mineral Safeguarding Area (MSA), Mineral Consultation Area (MCA) and/or Waste Consultation Area (WCA) and the any potential individual and collective impacts of the Uttlesford local plan sites on mineral and waste matters.</p> <p>Uttlesford DC will need to work with ECC to ensure high-level scoping and assessment of potential Local Plan sites, and any subsequent detailed assessments with regards to the individual and collective impacts of potential sites located in MSAs and MCAs and WCAs, subject to policies MLP S5, S8, S9 and WLP policy 2.</p> <p>The site is located within 250m of a MCA and WCA with regards the safeguarded site at Newport Chalk Quarry.</p> <p>A Minerals Infrastructure Impact Assessment would be required to demonstrate the site would not be incompatible with or compromise the operation of the safeguarded, permitted, planned minerals infrastructure, in compliance with MLP Policies S5, S8 and S9.</p>	<p>ECC as the MWPA require the following additional wording to be incorporated into the ‘Site Template’ (pages 6 – 9) for this allocation</p> <ul style="list-style-type: none"> • <u>Undertake a Waste Infrastructure Assessment given its proximity to Newport Chalk Quarry</u> • <u>Undertake a Mineral Infrastructure Assessment given its proximity to Newport Chalk Quarry</u> • <u>Liaise with ECC as the Minerals and Waste Planning Authority on mineral and waste matters.</u>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		A Waste Infrastructure Impact Assessment would be required to support site selection for proposals within WCA's, to ensure the continued and future operation of the waste infrastructure would not be compromised.	
Para 5.8	R	<p>ECC notes that this section refers to a “new sixth form centre” which would be part of Saffron Walden County High. As previously highlighted to our comments on Core Policy 5, ECC has statutory responsibilities as the lead authority for Education Authority. In Duty to Cooperate discussions ECC have highlighted that Saffron Walden County High has stated that they will not consider a separate 6th form centre.</p> <p>ECC acknowledges that a suitable and deliverable solution to the provision of secondary education in Saffron Waldon will need to be found. At this stage there is no agreement or support to a “new Sixth Form Centre”. The proposal as framed is not deliverable and agreement on this matter must be sought otherwise it must be deleted.</p>	<p>ECC recommends that all reference to the Saffron Walden County High 'sixth form centre' be removed from this paragraph and the entire Local Plan.</p> <p>At this stage there is no agreement or support to a “new Sixth Form Centre”. The proposal as framed is not deliverable and agreement on this matter must be sought before it can be included in the Submission Plan otherwise it must be deleted.</p>
Para 5.8	R	<p>ECC notes there is yet to be agreement on the Sixth Form Centre proposal for Saffron Walden. Therefore the impacts of school travel on the transport network are not fully understood. The precise location of educational facilities and provision is key to understanding potential congestion and exploring the deliverability and viability of sustainable travel options.</p> <p>ECC is aware that the employment designation to the southwest of the town, is not currently modelled, and there is not a clear understanding of the impact this may have on</p>	<p>ECC recommends that further discussions are undertaken with ECC to review and refine the transport modelling and ensure that the assumptions are viable and deliverable.</p> <p>Once finalised, the Uttlesford Local Cycling Walking Implementation Plan outputs will need to be discussed and appropriately reflected in the Submission Plan.</p>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>transport movements. ECC notes that it is likely an issue for HGVs serving the allocation. For HGV's to access the location they must traverse the town west to east, modelling will be required to determine the impact within Saffron Walden.</p> <p>ECC also notes that the current transport model does not include the B1393. This may impact assumptions in built into the model and may not be representative of driver behaviour. ECC would welcome greater understanding on the wider assumptions on driver choice and behaviour.</p> <p>The forecast model will need to include an agreed and acceptable level of sustainable travel modal split. This must be rectified to ensure that it reflects likely future expected patterns of behaviour and there is an agreed modal split understanding with ECC as the Highway and Transport Authority.</p> <p>Work will also continue on the Uttlesford Local Cycling Walking Implementation Plan where outputs will need to be reflected in the Submission Plan to enable a more informed assessment of the level of sustainable travel likely to be achieved and assumed within the model.</p>	
<p>5.8 (page 51)</p> <p>5.22 (page 57)</p>	<p>S / R</p>	<p>ECC recommends that 5.8 bullet point 5 and 5.22 bullet point 4 (land at Wicken Road) refer to multipurpose open and green spaces, and multifunctional GI delivery. Multifunctional spaces bring a wider spectrum of environmental, social and economic benefits to urban areas, especially for small areas of open spaces, and are more cost-</p>	<p>ECC recommends the following amendments -</p> <p>Bullet point 5 to say multipurpose open and green spaces, GI enhancements.</p>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>effective for addressing social, wellbeing, drainage and other hard infrastructure needs.</p> <p>For 5.8 bullet point 8 and 5.22 bullet point 5 (Land at Wicken Road) to mention high-quality and attractive walking and cycling links.</p>	5.8 bullet point 8 and 5.22 bullet point 5 (Land at Wicken Road) to say high-quality <u>and attractive</u> walking and cycling links
Para 5.11	O / R	Note ECC's views from para 5.8 concerning the reference to the 'sixth form centre' for Saffron Walden County High. ECC have commenced undertaking a desk-top study to review how much additional capacity, if any, may be acceptable on Saffron Walden County High's existing campus. It must be noted that the extra capacity is unlikely to be sufficient to meet all the demand from the extant permissions and new allocation.	ECC recommends removing reference to the ' <i>sixth form centre</i> ' and state that families that currently have a reasonable expectation of places for their children at SWCH may in the future have to be offered places at alternative schools as a result of the proposed allocations.
Para 5.11	R	Note ECC's comments for para 5.8 on transport and the reference to the Sixth Form Centre.	See recommendation for para 5.8.
Para 5.12 and 5.26	R	<p>ECC notes that this paragraph proposes the delivery of a link road. As it states "<i>provision has been made for the delivery of a link road which connects Thaxted Road and Radwinter Road, thereby alleviating pressure from vehicular traffic within the constrained town centre and facilitating greater connectivity</i>".</p> <p>ECC considers that the link road as currently proposed through development is not suitable as a primary link between Radwinter and Thaxted Road as it traverses through residential area.</p> <p>The design and features of the route need careful consideration. Attention is drawn to the Essex Design Guide, Highways Technical Manual and in particular the</p>	<p>ECC recommends that alternative routeing/new route option especially for HGVs must be proposed and agreed with the Local Highways and Transport Authority.</p> <p>ECC recommends that consideration is given to the Highways Technical Manual guidance and that the information in the Local Plan must be consistent.</p>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<u>Street Types Table</u> which outlines the key design features of streets and the numbers of dwellings they should serve.	
Para 5.13	R	It must be noted and has previously been highlighted at Duty to Cooperate discussions Newport Primary school occupies a site with limited potential for expansion. It is unclear how pupils from this level of development can be accommodated.	ECC recommends that further testing and discussions are required to determine whether this is a sustainable level of development in education terms.
Para 5.14	GC / R	ECC notes that this paragraph states there is “no development proposed at Great Chesterford”. ECC is mindful that the Local Plan reflects the position from committed development since April 2023. It is important that known future commitments are clearly articulated in the emerging Local Plan, and the spatial strategy clearly and logically presented.	ECC recommends the Local Plan reflect the known commitments from April 2023 to present, and the implications of the spatial strategy and infrastructure are clearly discussed and reviewed with key partners, including ECC.
Para 5.19	S / R	ECC welcomes the Chesterford Research Park and the economic opportunities it can provide for Essex. However, the location of Chesterford Research Park is relatively isolated. It is important that the Local Plan proposes approaches to stimulate sustainable travel e.g. facilitating improved active travel, links to local rail and bus routes etc.	ECC recommends that the text in this section be amended to show an appreciation of how the Local Plan seeks to enhance sustainable transport through facilitating further growth at Chesterford Research Park and provide an understanding of how this will be reflected in any transport evidence and policy requirements.
Paragraph 5.22 Land at Pond Cross Farm, Frambury Lane	R	This area contains evidence of a former windmill and trackway which could be protected within the scheme. Not identified on the background archaeological information.	Potential for preservation within scheme possibly associated with a PROW.
Paragraph 5.39 North Uttlesford Heritage	R	There is extensive occupation from the Bronze Age onwards with the area containing settlement and burial activity throughout the Bronze and Iron Age. Would recommend a change of wording.	ECC recommends the following wording change – <i><u>“There is extensive occupation from the Bronze Age onwards with the area containing settlement and burial activity throughout the Bronze and Iron Age. During the Roman period Great Chesterford is the only other masonry walled town in Essex apart from Colchester, with many Roman settlements and farmsteads identified during development across the area”.</u></i>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
Figure 5.1 – Area Strategy Map	R	ECC has reviewed the area strategy map and considers that key employment sites such as Chesterford Research Park, and any others are included.	It is recommended that given the strategic importance of Chesterford Research Park that it be included on the Area Strategy Map.
Core Policy 6: North Uttlesford Area Strategy	R	<p>ECC has provided comments on paragraph numbers related to the various aspects contained in this policy.</p> <p>ECC acknowledges that the policy refers to aligning housing with infrastructure and achieving sustainable development, which is an approach that ECC supports. However, the level of growth set out for each settlement (allocations and extant permissions) does not fully align with the availability of school places or opportunities to expand capacity.</p> <p>Further discussions are sought with ECC to ensure the distribution and quantum of growth can viably support the required infrastructure. In particular, ECC needs to ensure new development fully supports education provision and does not result in a cost burden to ECC; and maximises opportunities for sustainable and active travel.</p> <p>Attention is drawn to the allocations set out in this consultation, they are different to those figures previously provided by UDC, which were tested as part of ECC's school scenario assessment in Summer 2023.</p>	<p>Note comments and address as part of ongoing duty to cooperate discussions with ECC.</p> <p>ECC will need to undertake a further 'scenario test' to identify whether there are viable solutions which offer sustainable school place planning responses to the allocations set out in this policy. Revisions to the spatial strategy may be required to ensure that UDC delivers on the infrastructure led approach outlined in the Local Plan and supported by ECC and there is not a cost burden to ECC.</p>
Para 5.22	R	ECC notes that within Newport 412 dwellings are expected to be delivered, accompanied by green infrastructure, open spaces and new transport infrastructure. ECC recommends that further consideration is given to ECC's <u>Garden Communities and Planning School Places Guide</u> . Developing a clear masterplan is recommended. The ECC guide provides an understanding of why distribution is an important factor to consider when determining site plans,	ECC recommends that this section be amended to show a commitment to delivering a joint masterplan for the proposed development sites.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		layout and/or a masterplan for a large site or Garden Community.	
Para 5.23	R	See comments above relating to a new sixth form centre	Further discussions need to take place on this matter.
Para 5.23	GC / R	ECC wishes to echo the comments from para. 5.22 and ensure that Saffron Walden growth is planned effectively and a joint masterplan prepared to ensure amongst other matters sustainable travel is effectively addressed.	ECC recommends that the paragraph be amended to ensure the delivery of a joint masterplan for development sites.
Para 5.23	S / R	ECC welcomes the inclusion of bullet point 3 regarding the provision of network of green spaces that are interconnected. As highlighted in other comments reference to multifunctional GI and interconnected green spaces should be included.	ECC recommends the insertion of – “Provide a network of <u>multifunctional green infrastructure</u> and green spaces that are interconnected”.
Para 5.23	GC / R	Inconsistent approach to referencing asset owning physical activity clubs across the district. Newport cricket is referenced on pg.58 but where Saffron Waldon Youth are located there is no reference.	Transparency as to why some clubs are included over others or reference to a wider range in the individual localities.
Para 5.24	R	ECC notes that this paragraph should reference to accessibility by sustainable modes to employment sites. It should be noted that ECC works alongside developers, businesses, and transport consultants on the creation, implementation and delivery of Travel Plans (<u>Residential</u> and <u>Businesses</u>), as well as the supply and distribution of Travel Information Packs for new development sites. Travel Plans contain information on practical travel initiatives, and the range of transport options available, in order to encourage occupiers, employers, and employees to think about the way they travel to and from home and work, to encourage sustainable travel.	ECC recommends that reference must be given to accessibility to employment site by sustainable modes. See comments in this response relating to Travel Plans.
Core Policy 7: Delivery of Transport	R	ECC has provided comments on paragraph numbers related to the various aspects contained in this policy. ECC will continue to work with UDC to refine and update the	Note comments and address as part of ongoing duty to cooperate discussions with ECC.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
Schemes Within North Uttlesford		evidence base to ensure schemes are appropriate and deliverable.	
Para 5.30 Core Policy 8: Safeguarding of Land for Strategic Transport Schemes in the North Uttlesford Area	GC	ECC considers that the safeguarding of specific routes can only be clearly articulated in supporting text and policy once the evidence base and all studies are complete. It must be noted that Rapid Transit System (RTS) routes and bus priority routes should be safeguarded where possible.	ECC recommends that safeguarding of routes is considered following completion of all relevant studies and in liaison with ECC as the Highways and Transportation Authority.
Para 5.31 – 5.37	S	ECC welcomes the recommendations for the protection, enhancement and connectivity of GI. It is however recommended that para. 5.33 refers to multipurpose open and green spaces that is inclusive to all - consistent with Sports England Active Design Principles to create attractive 'active environments'.	Paragraph 5.33 should include reference to multipurpose open and green spaces and explore opportunities to link/contribute to the Greater Essex Local Nature Recovery Strategy.
Chapter 6 – South Uttlesford Area Strategy A summary of ECC's response is set out at outset within paragraph 3.11.			
Chapter 6 – South Uttlesford Area Strategy/Site Development Templates, Appendix 3 – South Uttlesford Site Development Templates, Site 7	R	ECC, as the Mineral and Waste Planning Authority, has assessed the site allocations identified in the 'Site Templates' document against policy requirements in the Essex Mineral Local Plan (MLP) Policy S8 – Safeguarding mineral resources and mineral reserves, and the Essex and Southend-on-Sea Waste Local Plan (WLP) Policy 2 - Safeguarding Waste Management Sites and Infrastructure. The assessment identifies whether any proposed allocated site in the Draft Uttlesford Local Plan is located within a Mineral Safeguarding Area (MSA), Mineral Consultation	ECC recommend the following requirements are incorporated into the 'Site Template' (pages 30 – 34) for this allocation to read: <ul style="list-style-type: none"> • <i>Undertake a Minerals Resource Assessment</i>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
– Church End East, Great Dunmow (869 homes)		<p>Area (MCA) and/or Waste Consultation Area (WCA) and the any potential individual and collective impacts of the Uttlesford local plan sites on mineral and waste matters.</p> <p>Uttlesford DC will need to work with ECC to ensure high-level scoping and assessment of potential Local Plan sites, and any subsequent detailed assessments with regards to the individual and collective impacts of potential sites located in MSAs and MCAs and WCAs, subject to policies MLP S5, S8, S9 and WLP policy 2.</p> <p>The site is located within a MSA for chalk, is more than 3 hectares in scale (a 100m buffer has been applied around nearby residential properties) and thereby <u>requires a Mineral Resource Assessment</u> (MRA) to be undertaken by the applicant (in consultation with the MWPA) in accordance with MLP Policy S8 - Safeguarding mineral resources and mineral reserves. The MRA will help establish the practicality and environmental feasibility of the prior extraction of mineral such that the resource is not sterilised. The scope of the MRA will need to be agreed with ECC as the MWPA. If necessary, the MWPA may require prior extraction of minerals resource, and the timing and delivery of this would need to be taken into account by the LPA, especially in relation to site phasing and delivery.</p>	
Chapter 6 – South Uttlesford Area Strategy/Site Development Templates, Appendix 3 –	R	<p>ECC, as the Mineral and Waste Planning Authority, has assessed the site allocations identified in the ‘Site Templates’ document against policy requirements in the Essex Mineral Local Plan (MLP) Policy S8 – Safeguarding mineral resources and mineral reserves, and the Essex and Southend-on-Sea Waste Local Plan (WLP) Policy 2 - Safeguarding Waste Management Sites and Infrastructure.</p>	<p>ECC recommend the following requirements are incorporated into the ‘Site Template’ (pages 24 – 29) for this allocation to read:</p> <ul style="list-style-type: none"> • <u>Undertake a Minerals Resource Assessment</u> • <u>Undertake a Waste Infrastructure Assessment given its proximity to Crumps Farm</u>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
<p>South Uttlesford Site Development Templates, Site 8 – North East Takeley, Takeley/Little Canfield (1,636 homes)</p>		<p>Uttlesford DC will need to work with ECC to ensure high-level scoping and assessment of potential Local Plan sites, and any subsequent detailed assessments with regards to the individual and collective impacts of potential sites located in MSAs and MCAs and WCAs, subject to policies MLP S5, S8, S9 and WLP policy 2.</p> <p>The site is located within a MSA for chalk, is more than 3 hectares in scale (a 100m buffer has been applied around nearby residential properties) and thereby <u>requires a Mineral Resource Assessment</u> (MRA) to be undertaken by the applicant (in consultation with the MWPA) in accordance with MLP Policy S8 - Safeguarding mineral resources and mineral reserves. The MRA will help establish the practicality and environmental feasibility of the prior extraction of mineral such that the resource is not sterilised. The scope of the MRA will need to be agreed with ECC as the MWPA. If necessary, the MWPA may require prior extraction of minerals resource, and the timing and delivery of this would need to be taken into account by the LPA, especially in relation to site phasing and delivery.</p> <p>The site is also located within 250m of a MCA and WCA with regards the safeguarded site at Crumps Farm, Great Canfield.</p> <p>A Minerals Infrastructure Impact Assessment would be required to demonstrate the site would not be incompatible with or compromise the operation of the safeguarded, permitted, planned minerals infrastructure, in compliance with MLP Policies S5, S8 and S9.</p>	<ul style="list-style-type: none"> • <u>Undertake a Mineral Infrastructure Assessment given its proximity to Crumps Farm.</u>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>A Waste Infrastructure Impact Assessment would be required to support site selection for proposals within WCA's, to ensure the continued and future operation of the waste infrastructure would not be compromised.</p>	
<p>Chapter 6 – South Uttlesford Area Strategy/Site Development Templates, Appendix 3 – South Uttlesford Site Development Templates, Site 9 – Land East of High Lane North, Stansted Mountfitchet (140 homes)</p>	<p>R</p>	<p>ECC, as the Mineral and Waste Planning Authority, has assessed the site allocations identified in the 'Site Templates' document against policy requirements in the Essex Mineral Local Plan (MLP) Policy S8 – Safeguarding mineral resources and mineral reserves, and the Essex and Southend-on-Sea Waste Local Plan (WLP) Policy 2 - Safeguarding Waste Management Sites and Infrastructure.</p> <p>Uttlesford DC will need to work with ECC to ensure high-level scoping and assessment of potential Local Plan sites, and any subsequent detailed assessments with regards to the individual and collective impacts of potential sites located in MSAs and MCAs and WCAs, subject to policies MLP S5, S8, S9 and WLP policy 2.</p> <p>The site is located within a MSA for chalk, is more than 3 hectares in scale (a 100m buffer has been applied around nearby residential properties) and thereby <u>requires a Mineral Resource Assessment</u> (MRA) to be undertaken by the applicant (in consultation with the MWPA) in accordance with MLP Policy S8 - Safeguarding mineral resources and mineral reserves. The MRA will help establish the practicality and environmental feasibility of the prior extraction of mineral such that the resource is not sterilised. The scope of the MRA will need to be agreed with ECC as the MWPA. If necessary, the MWPA may require prior extraction of minerals resource, and the timing and delivery</p>	<p>ECC recommend the following requirements are incorporated into the 'Site Template' (pages 19 - 22) for this allocation to read:</p> <ul style="list-style-type: none"> • <u>Undertake a Minerals Resource Assessment</u>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		of this would need to be taken into account by the LPA, especially in relation to site phasing and delivery.	
Chapter 6 – South Uttlesford Area Strategy/Site Development Templates, Appendix 3 – South Uttlesford Site Development Templates, Site 10 - Walpole Meadows North, East of Pennington Lane, Stansted Mountfitchet (250 homes)	R	<p>ECC, as the Mineral and Waste Planning Authority, has assessed the site allocations identified in the ‘Site Templates’ document against policy requirements in the Essex Mineral Local Plan (MLP) Policy S8 – Safeguarding mineral resources and mineral reserves, and the Essex and Southend-on-Sea Waste Local Plan (WLP) Policy 2 - Safeguarding Waste Management Sites and Infrastructure.</p> <p>Uttlesford DC will need to work with ECC to ensure high-level scoping and assessment of potential Local Plan sites, and any subsequent detailed assessments with regards to the individual and collective impacts of potential sites located in MSAs and MCAs and WCAs, subject to policies MLP S5, S8, S9 and WLP policy 2.</p> <p>The site is located within a MSA for chalk, is more than 3 hectares in scale (a 100m buffer has been applied around nearby residential properties) and thereby <u>requires a Mineral Resource Assessment (MRA)</u> to be undertaken by the applicant (in consultation with the MWPA) in accordance with MLP Policy S8 - Safeguarding mineral resources and mineral reserves. The MRA will help establish the practicality and environmental feasibility of the prior extraction of mineral such that the resource is not sterilised. The scope of the MRA will need to be agreed with ECC as the MWPA. If necessary, the MWPA may require prior extraction of minerals resource, and the timing and delivery of this would need to be taken into account by the LPA, especially in relation to site phasing and delivery.</p>	<p>It appears this site is not included in the Site Template Document, which accompanies the DULP. If this is an allocation then it must be included. A requirement for the site will be to make reference to the following:</p> <ul style="list-style-type: none"> • <u>Undertake a Minerals Resource Assessment</u>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
Para 6.2	S / R	<p>ECC notes and supports reference to Stansted performing the role as a multi modal transport hub.</p> <p>This is consistent with the approach advocated within national Government policy. The Department for Transport strategy entitled Flightpath to the Future published in May 2022 promotes the use of airports as transport hubs. It is further referenced within the Airport National Policy Statement where it highlights that “airport surface access strategy must contain specific targets for maximising the proportion of journeys made to the airport by public transport, cycling or walking”. With this in mind it is recommended that UDC’s Local Plan seeks to promote the use of Stansted as a multi modal transport hub recognising the challenges and working with key partners (such as ECC, MAG) to deliver a multi modal transport hub benefitting the airport passengers, staff and local businesses.</p>	<p>ECC recommends that the Local Plan assists in seeking to ensure that partners (including ECC) work collaboratively to deliver a multi modal transport hub at Stansted Airport.</p> <p>Ensuring that challenges are addressed within the Local Plan, LTP4, airport Masterplans and Airport Surface Access Strategies. Acknowledging the role of the Airport Transport Forum.</p>
Para 6.7	R	<p>ECC acknowledges that this paragraph is primarily discussing the merits of Takeley. It refers to Takeley requiring transportation links to the interchange at Stansted Airport, whilst this would be understandable given the scale of development at Takeley. It is important that the Local Plan also seeks to be supportive of facilitating public transport connectivity to other key locations that would assist with the airports surface access targets and support the emerging Airport Surface Access Strategy.</p>	<p>ECC recommends that the Local Plan strengthens references to the role of Stansted as a multi modal transport interchange. It provides the opportunity for excellent connectivity internationally, regionally and locally. Providing a choice mode of transportation that is accessible for those that choose to live, work and invest in Uttlesford.</p> <p>Demonstrating this understanding in the Local Plan, strengthens the inter-relationship between the Local Plan, LTP, and Stansted Masterplan/Airport Surface Access Strategy.</p>
Para 6.9	R	<p>How the South Uttlesford will change by 2041</p> <p>ECC recommends that the plan emphasises the importance of the airport operating as a multi modal transport hub. ECC notes the reference to active travel linkages and notes reference to public transport interchange at Stansted airport.</p>	<p>ECC recommends that UDC seek to promote a multi modal transport hub at Stansted, to ensure it promotes and facilitates a choice of transport modes.</p> <p>Ensure the Local Plan is updated to ensure an understanding of the committed developments since April 2023, and how this impacts the spatial strategy for the Local Plan.</p>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>ECC notes that the secondary schools are referenced effectively, but the primary schools are referred to more generally. Locating schools in locations that will facilitate the use of active travel modes is important, and consideration on the impact for the wider transport network given appropriate assessment. ECC also recommended reviewing information and advice given school location needs to be confirmed as this will impact the wider transport network.</p> <p>Also see ECC's comments to para 4.7.</p> <p>It is noted that the Local Plan does not include reference to committed developments beyond April 2023. A large allocation has now been granted on appeal at Easton Park. The Local Plan must be amended to consider the impact on the spatial strategy.</p>	
Para 6.9	R	ECC considers that the reference to a new school at Great Dunmow is misleading. It is the relocation of Helena Romanes to a new campus and the secondary age range and capacity remains unchanged. Reference should be changed in the DULP.	ECC recommends that reference to the school must be amended to read ' <i>rebuilt</i> secondary school already planned at Great Dunmow' rather than 'new'.
Para 6.13	R	<p>The paragraph states “....<i>different tenures with specialist housing including those that are suited to our ageing population and people who wish to rent</i>”.</p> <p>It would benefit from greater clarity as it could be read that specialist housing is only for those who are older.</p>	<p>It is recommended that “specialist housing” is clearly defined.</p> <p>It is recommended that “supported housing” is clearly defined.</p> <p>Both terms are defined in the Local Housing Needs Assessment LHNA Update October 2023.pdf (modern.gov.co.uk) but not in the local plan glossary.</p>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
			Greater clarity is required to include housing for residents with additional support needs such as older people, people with Learning Disabilities or Autism, sensory or physical disabilities Domestic Abuse refuges or accommodation for ex-prisoners or care leavers. <u>Guide to the supported accommodation regulations including quality standards (publishing.service.gov.uk)</u>
Para 6.15 – 16	GC / R	The Local Plan can be strengthened to show a full appreciation of the role that the airport performs for the local, regional and national economy. Stansted plays a significant role for passenger transport and the movement of people to facilitate economic growth, exchange of ideas and facilitates business travel. The airport also has a significant role for freight. As previously highlighted in comments for para 4.30 Stansted Airport has planning permission (reference UTT/18/0460/FUL) that was granted on appeal, to allow airfield works enabling 274,000 aircraft movements (of which 16,000 movements may be Cargo Air Transport Movements) and a passenger throughput of 43 million per annum.	It is recommended that the Local Plan gives consideration to the airport's passenger and cargo role. Where possible highlighting the spatial implications and policy provisions that have been developed to continue to support and shape both passenger and cargo movement functions at the airport.
Page 70 Figure 6.2 Proposed Strategic Allocations at Great Dunmow	R	ECC acknowledges from figure 6.2 that the proposed primary school would be abutting a main vehicular route. This is contrary to ECC guidance and not good practice. The location should prioritise active travel and pupil safety. To assist UDC, attention is drawn to the ECC <u>Garden Communities and Planning School Places Guide</u> , which has previously been provided to UDC through Duty to Cooperate meetings and information supplied to inform plan preparation. This guide provides an understanding of why distribution is an important factor to consider when determining site plans, layout and/or a masterplan for a large site or Garden Community. A school's location can	ECC recommends that UDC must identify an alternative location which meets the location criteria set out in ECC's Developers' Guide to Infrastructure Contributions and the ECC Garden Communities and Planning School Places Guide.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		facilitate the greater adoption of active mode transport, and deliver distinct neighbourhoods provided as part of a local centre. ECC recommends that EYCC facilities, and schools are located centrally to the neighbourhoods they serve and away from primary traffic routes. Furthermore there is additional criteria within the ECC Developers Guide. ECC note that new school sites should be provided in largely traffic free school zones. Please refer to the ECC response provided for the Uttlesford Design Code.	
Para 6.17	R	ECC notes that the proposed allocation within figure 6.2 is seeking to deliver 869 dwellings. It is noted that a new primary school is proposed. A development of this scale would not support the development of a 2 form entry new school.	Further discussions with the ECC Education are required as part of a wider educational scenario test. ECC recommends that the text must be changed to read ' <i>a new 2.1ha education [and childcare] site will be allocated, if required. Its location will prioritise active travel and pupil safety in line with the criteria set out in ECC Developers' Guide</i> '.
Para 6.17	R	ECC notes that the development proposed is located to the east of a weak bridge, with a narrow carriageway on which buses are not permitted. The provision of suitable walking and cycling interventions are limited. ECC queries the evidence to support the allocation as given the road access limitations it will be challenging to facilitate sustainable travel. Modelling work to date has demonstrated additional traffic flows onto a congested part of the Great Dunmow network. ECC aims to minimise congestion in the town centre as this is not acceptable due to environmental, health, safety and attractiveness impacts.	ECC recommends that further consideration be given to the access arrangements for the site, and the ability to facilitate sustainable and active transport modes, to ensure that congestion in Great Dunmow is minimised. ECC welcomes further transport modelling discussions, to ensure the transport needs for this site are appropriately assessed and considered.
Para 6.18	R	Pennington Lane at Stansted is an Uttlesford Protected Lane.	Any development should include a considerable buffer zone from the Lane protecting its rural character and ensuring that no accesses are created onto it.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
Para 6.18	R / O	ECC notes that development proposed to the north of Stansted Mountfitchet is located to the northern boundary of the settlement, where active travel connections are currently limited. They are further exacerbated as existing developments do not provide sustainable mode opportunities. Congestion through the town centre is already an issue. ECC are mindful of congestion at the Newport Road/A120 junction. An understanding of current and future active travel connections/linkages is required.	ECC recommends this be a holding objection to development at the north of the town, pending a review of the LCWIP. This will enable to ECC to assess whether there are opportunities for sustainable and active modes.
Para 6.18	R	ECC notes that the quantum of development within Stansted Mountfitchet is 390 dwellings. This scale of development proposed will not deliver a new primary school. ECC notes that a commitment to allocate land for education use adjacent to Forest Hall was sought on the basis of previous testing, albeit this now needs to be revisited.	ECC recommends that further testing and discussions are required to determine whether this is a sustainable level of development in education terms. Bullet point must read ' <i>a 2.1ha education [and childcare] site and additional land to expand Forest Hall will be allocated, if required, in line with ECC's Developers' Guide to Infrastructure Contributions.</i> '
Para 6.19	GC / R	The moated site of Warish Hall is a Scheduled Monument and contains a designated property, with the adjacent lane a protected lane. The location of this development goes against proposals under 6.51 where Warish Hall should be identified. It is unclear how this layout has been designed when considering the statement in 6.53.	The proposed school extending to lie adjacent the scheduled monument will have an impact on the setting of both. The overall development will also have an impact on the protected lane unless its rural nature can be enshrined within any development brief. Further consideration is required.
Para 6.19	R	ECC are concerned that the modelling seen to date does not replicate existing conditions at M11 J8, in particular the B1256 approach from Takeley which encounters significant queuing. This is likely to impact on how traffic exits any allocation in Takeley, impacting routes through the airport or junctions at Great Dunmow (capacity at A120 junction is an issues). National Highways have also alerted UDC to similar issues.	ECC recommends that further detailed modelling work is required to identify existing congestion and the impact on alternative routes.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
Page 74 Fig 6.4 Proposed Strategic Allocations at Stansted Mountfitchet	O / R	A school site in the location shown, adjacent to the A120, is unlikely to be acceptable due to noise levels. As previously highlighted in comments on figure 6.2 new schools should not be located on the main vehicular route through new developments.	ECC recommends identifying an alternative location for the school which meets the criteria set out in ECC's Developers' Guide to Infrastructure Contributions and the Garden Communities and Planning School Places Guide.
Para 6.19	R	ECC recommends reviewing comments to figure 6.4, the education land should not be allocated on the north-eastern boundary. The primary and secondary school allocations must also be adjacent to facilitate the establishment of an all-through school.	ECC recommends that the text for bullets 1 and 2 must be amended to read: <i>'Up to 14.5ha of land, meeting the criteria set out in ECC's Developers Guide to Infrastructure Contributions, will be allocated for education [and childcare] use to facilitate a new all-through school.'</i>
Stansted Airport A summary of ECC's response is set out at outset within paragraph 3.11.			
Para 6.19	R	ECC notes that UDC have used the term 'transport hub' for Stansted airport. ECC recommends that this be replaced to 'multi modal transport hub'. This will clearly show the importance of the airport providing choice modes of transports for those persons using the airport, and the community that would wish to access the airport and take advantage of the excellent public transport, and active travel links to existing and future locations of employment. This is consistent with Department for Transport aviation policy (see comment for para 6.2).	ECC recommends that the term ' <u>multi modal transport hub</u> ' be used to describe the airport.
Para 6.19	O/R	The wording in this paragraph states "additional long-haul passengers will impact on transport movements in areas for travellers and employees". ECC considers the sentence to be misleading, and objects. It should be noted that planning application UTT/18/0460/FUL facilitated the growth in passenger numbers at the airport	ECC recommends that this sentence be deleted from the Local Plan.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>to 43mppa. ECC as Highways and Transport Authority were satisfied that there were sufficient transport measures adopted to mitigate the growth in highways movements. ECC considers that in developing the emerging Local Plan and spatial strategy that due consideration is given to transport modelling information to understand the extent to which further employment and housing growth can be accommodated.</p>	
Para 6.19	GC / R	<p>ECC notes that at Takeley there is approximately 1,636 dwellings as well as employment allocations at Stansted and Northside. Given the wider scale of development in this locality it is recommended that a joint masterplan of all sites be prepared.</p> <p>ECC recommends that further consideration is given to ECC's <u>Garden Communities and Planning School Places Guide</u> as this is a large allocation. Developing a clear masterplan is recommended. The ECC guide provides an understanding of why distribution is an important factor to consider when determining site plans, layout and/or a masterplan for a large site or Garden Community. This will assist with developing principles and delivering a layout that facilitates sustainable transport. It is also important to note that a school's location can facilitate the greater adoption of active mode transport, and deliver distinct neighbourhoods provided as part of a local centre. ECC recommends that EYCC facilities, and schools are located centrally to the neighbourhoods they serve and away from primary traffic routes.</p> <p>ECC notes that the LCWIP study will be available in early 2024. It is important that this is fed into the any masterplan and emerging Local Plan</p>	<p>Develop a joint masterplan for the area including allocations at Stansted and Northside. Also review the LCWIP and continue dialogue with ECC to understand the implications for the Local Plan.</p>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
6.20	R	ECC notes that the Local Plan states “Sustainable transport choice to and from the airport should be available over the 24-hour period, building on existing services and improving routes”. The Local Plan must be realistic and deliverable. Whilst bus and coach services may be possible over a 24 hour period, rail is unlikely due to the need for overnight maintenance. It is important that assumptions on transportation operations that have underpinned the evidence and policy realistic.	ECC recommends that the sentence be re-drafted to reflect accurate transport assumptions that are deliverable within the plan period.
6.21	R	The local plan needs to provide a clear understanding of the role of an airport masterplan and the Airport Surface Access Strategy.	ECC recommends that UDC gains an appreciation of the role of masterplans and Airport Surface Access Strategies, and considers the guidance highlighted to officers in ECC views from para 2.2.
6.22	GC / R	<p>ECC notes that the only national policy reference that is given for the text to support the overarching airport policy entitled Core Policy 11: London Stansted Airport is to the National Planning Policy Framework (NPPF). Whilst ECC acknowledge the importance of the NPPF, there are other national policies that must be drawn upon when developing the emerging Local Plan. ECC recommends that UDC considers the following –</p> <ul style="list-style-type: none"> • <u>Department for Transport - Beyond the Horizon - the Future of UK Aviation – Making Best Use of Existing Runways (2018) (MBU)</u>. The MBU sets out Government support for airports beyond Heathrow making best use of their existing runways, subject to related economic and environmental considerations being considered. It allows airports to increase either the passenger or air traffic movement caps to allow them to make best use of their existing runways through the submission of a planning applications. MBU allows applications to increase existing planning caps by fewer than 10 million passengers per annum (mppa). London Stansted was 	<p>ECC recommends that UDC seeks to refer wider airport policy, and ensure that the emerging Local Plan reflects and is consistent with national policy.</p> <p>ECC welcomes working collaboratively with UDC to develop future aviation policy to inform the Local Plan.</p>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>the first UK airport to be granted permission on appeal (reference - UTT/18/0460/FUL) following the publication of this policy.</p> <ul style="list-style-type: none"> <u>Department for Transport – Airport National Policy Statement (Airport NPS) New Runway Capacity and Infrastructure at Airports in the South East of England (2018)</u>. The Airports NPS provides the primary basis for decision making on development consent applications for a Northwest Runway at Heathrow Airport, and is an important and relevant consideration in respect of applications for new runway capacity and other airport infrastructure in London and the South East of England. The Airports NPS sets out: <ul style="list-style-type: none"> ○ The Government’s policy on the need for new airport capacity in the South East of England; ○ The Government’s preferred location and scheme to deliver new capacity; and ○ Particular considerations relevant to a development consent application to which the Airports NPS relates. <p>It sets out planning policy in relation to applications for any airport nationally significant infrastructure project in the South East of England, and its policies are relevant for the examination by the Examining Authority, and decisions by the Secretary of State, in relation to such applications.</p> <p>For a scheme to be compliant with the Airports NPS, the Secretary of State expects to see the elements set out in the NPS comprised in its design, and their implementation and delivery secured, particularly with</p>	

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		<p>regard to runway length and increased capacity of air transport movements. The Airports NPS makes it clear that other NPSs may also be relevant to decisions on nationally significant infrastructure projects at airports and these should be considered where appropriate.</p> <ul style="list-style-type: none"> • <u>Department for Transport - Aviation Strategy entitled 'Flightpath to the Future' (2022).</u> The Aviation Strategy sets out a strategic framework for the sector. It provides clarity on the key priorities and an understanding of how Government and industry will work together to deliver them. It continues to highlight that aviation enhances global connectivity and trade, and the importance of retaining the UK position as one of the strongest aviation and aerospace sectors in the world, whilst delivering a greener and cleaner sector. The strategy supports sustainable airport growth within acceptable environmental limits. It highlights support for Jet Zero, and airspace modernisation. There is a recognition for a need to enhance skills and capacity across the sector. Consideration should also be given to the increasing importance of General Aviation within the UK economy and the aviation sector. It is important that due consideration is given to this policy to assist in shaping emerging Local Plan policy. • <u>Department for Transport - Jet Zero Strategy – Delivering Net Zero Aviation by 2050 (2022).</u> The strategy sets out clear targets committing the UK aviation sector to reaching net zero, or Jet Zero, by 2050 and reiterates the Government's commitment to airspace modernisation to deliver quicker, quieter and cleaner air travel. It provides an appreciation of the implications and need to meet the UK's earlier target for 	

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		<p>domestic flights reaching net zero by 2040. There is recognition of the employment opportunities provided for with the growth of the aerospace manufacturing market and decarbonisation of air travel. There is an appreciation that the aviation sector requires the promotion and delivery of future skills development. This strategy reiterates the Government’s commitment to growth in the sector, and the importance of collaborating with key partners to improve surface access through developing Masterplans and Surface Access Strategies. It is important that in developing Local Plan policy consideration is given to the information presented in this strategy, the challenges facing the sector, and the likely matters that will be considered throughout the period of the Local Plan.</p> <ul style="list-style-type: none"> • <u>Department for Transport - Aviation Policy Framework (2013)</u>. The Aviation Policy Framework was published under the 2010 to 2015 Conservative and Liberal Democrat coalition government, and remains an adopted Government policy. Providing some of the key guidance for aviation matters. In preparing Local Plans it is important to note that Local Authorities should have due regard to the following matters – environmental, noise, safeguarding, public safety zones and surface accessibility. It should be noted that the Aviation Policy Framework sets out the latest guidance for the production masterplans, airport transport forums and airport surface access strategies. • <u>Department for Transport – Overarching Aviation Noise Policy Statement (2023)</u>. The Aviation Strategy (2022) highlighted the Government’s commitment to taking steps to refresh national aviation noise policy. A key 	

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		<p>component of this was to review and revise the national aviation noise policy statement. This statement has been revised to –</p> <p><i>“The government’s overall policy on aviation noise is to balance the economic and consumer benefits of aviation against their social and health implications in line with the International Civil Aviation Organisation’s Balanced Approach to Aircraft Noise Management. This should take into account the local and national context of both passenger and freight operations, and recognise the additional health impacts of night flights. The impact of aviation noise must be mitigated as much as is practicable and realistic to do so, limiting, and where possible reducing, the total adverse impacts on health and quality of life from aviation noise”.</i></p> <p>The DfT intended to publish a noise policy paper later in 2023 (yet to be published), which will set out a plan to monitor progress against the objective and the specific actions to be taken and how the government will evaluate whether the policy aims are met.</p> <ul style="list-style-type: none"> • <u>Department for Transport – Night Flight Restrictions at Heathrow, Gatwick and Stansted – Decision Document (2021)</u>. This document sets out night noise restrictions for the designated airports that include Stansted. It highlights the Government’s view on – <ul style="list-style-type: none"> ○ Proposal to maintain the existing night noise objective for the designated airports for two years, from October 2022 to October 2024; ○ Measurement of the noise objective for the designated airports; 	

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<ul style="list-style-type: none"> ○ Proposal to maintain the existing regime at the designated airports for two years, from October 2022 to October 2024; and ○ Proposal to ban QC4 rated aircraft movements from operating at the designated airports between 23:30 and 06:00 from October 2022. <p>The Government are currently considering the night-time noise abatement objective for the designated airports, which is due to commence in October 2025. A consultation on the next night flight regime for the designated airports is expected late in 2023.</p>	
6.23	R	<p>ECC considers that the Local Plan should fully appreciate the opportunity and significant role London Stansted Airport plays in the regional and national economy. This will assist in capitalising on the opportunities this provides for those that live, work and invest in the locality.</p> <p>The Local Plan should also ensure that the beginning chapters and the vision show an understanding of the airports role, and its strategic significance.</p>	ECC recommends that the Local Plan strengthen reference to London Stansted's role within the regional and national economy.
6.28	GC / R	ECC questions how the spatial development strategy proposed within the emerging Uttlesford Local Plan has considered the potential noise impact likely to be experienced by future developments that are sensitive to aviation noise.	ECC recommends understanding the aviation noise impacts likely to be experienced by noise sensitive buildings from the future spatial strategy proposals outlined in the Regulation 18 Local Plan.
6.29	GC / R	ECC notes the reference to the NPPF within paragraph 6.29 as it states "where planning permission is granted for development, the Council may impose conditions in accordance with the NPPF noise guidance and Core Policy 43: Noise". Whilst ECC welcomes reference to the NPPF, as	<p>ECC recommends that the supporting text and emerging policy is developed with a full understanding of the relevant international, and national policies that may assist in shaping UDC's future noise and aviation policy -</p> <ul style="list-style-type: none"> • International Civil Aviation Organisation (ICAO) – Balanced Approach – ICAO is a specialised agency of the United Nations. It aims to develop

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		<p>outlined in our response to paragraph 6.21 there is a need to consider a wider policy remit when devising policy.</p> <p>ECC recommends that challenges often experienced by the local community from proximity to aerodromes should be outlined within the Local Plan. These may be included within the environment section or as part of the reference to Stansted. The challenges should refer to addressing noise, air quality, safeguarding and the relationships with public health.</p>	<p>the principles and techniques of international civil air navigation and planning and development for air transport. ICAO established a 'Balanced Approach' for managing aircraft noise with four priorities presented. Of particular relevance for the Local Plan is the role of land use planning and management, controlling how land can be utilised and managed to discourage or prevent building of new housing and noise sensitive facilities in areas where aircraft noise is likely to be an issue.</p> <ul style="list-style-type: none"> • <u>World Health Organisation – Noise and Health Guidelines</u> – These guidelines collated research into the health effects of noise disturbance, including from aircraft noise, and made recommendations to governments on managing noise levels. • <u>Aviation Policy Framework (APF)</u>– The APF set out the Government's overall noise objective, which was "...to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise, as part of a policy of sharing benefits of noise reduction with industry." The Department for Transport produced guidance that assisted on developing the understanding for its application. • <u>Department for Transport – Flightpath to the Future (2022)</u> – Within this strategy it highlights the Government's intention to set out a "clearer noise policy framework alongside measures to incentivise best operational practice to reduce noise and measures to improve airport noise insulation schemes". It is important that policy is devised with an understanding of the parameters and breadth of matters that it may wish to detail. Given that the Government is yet to provide the clear noise framework. • <u>Department for Transport – Overarching Aviation Noise Policy Statement (2023)</u>. The Aviation Strategy (2022) highlighted the Government's commitment to taking steps to refresh national aviation noise policy. A key component of this was to review and revise the national aviation noise policy statement. This statement has been revised earlier in 2023.

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			<p><u>Department for Transport – Night Flight Restrictions at Heathrow, Gatwick and Stansted – Decision Document (2021)</u>. This document sets out night noise restrictions for the designated airports that include Stansted.</p> <p>ECC recommends that the Local Plan must demonstrate an understanding of the challenges experienced by communities in close proximity to aerodromes. Reference should be given to addressing noise, air quality, safeguarding and the relationships with public health.</p>
<p>Para 6.20 – 29</p> <p>Core Policy 11: London Stansted Airport</p>	<p>R</p>	<p>ECC considers that the current policy must be strengthened. It must set out a clear understanding of the planning context that is envisaged for London Stansted Airport for the duration of this plan period.</p> <p>It must be clear about the mitigations and aspects that must be considered in assessing any future proposals at the airport.</p> <p>It must also demonstrate understanding of the London Stansted Airports relationship with wider national Government policies, and these must be acknowledged when reviewing future aviation policy.</p>	<p>ECC recommends that given this Local Plan is providing a vision for up to 2041, that from a Local Planning Authority perspective a clear understanding is given to the growth that is expected within the lifetime of the Local Plan. ECC would recommend that this vision be consistent with the current planning permissions. London Stansted Airport has planning permission (reference UTT/18/0460/FUL) that was granted on appeal, to allow airfield works enabling 274,000 aircraft movements (of which 16,000 movements may be Cargo Air Transport Movements) and a passenger throughput of 43 million per annum.</p> <p>It should be noted that there are key provisions within this planning permission that may assist in shaping the emerging policy including –</p> <p><u>Noise</u></p> <ul style="list-style-type: none"> • Revised noise mitigation scheme including revisions to the geographic area covered by the new scheme for residential and non-residential properties. • Lower noise penalty limits for breaching the noise thresholds and off track flying. <p><u>Transport and Surface Access</u></p> <ul style="list-style-type: none"> • Agreed highways mitigation scheme works, accompanied by a strategic highway review.

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			<ul style="list-style-type: none"> • Local Road Network fund to allow the County Council and Transport Forum to fund payments for local highway infrastructure improvements for all modes of transport. • Local Road Monitoring Scheme. • Local Bus Network Development Fund – grants to fund ultra-low emission vehicles/electric vehicles will be prioritised. • Sustainable Transport Levy – funds to be made available to the Transport Forum in accordance with the Surface Access Strategy to promote passenger and staff/employed at airport to promote alternative modes to the private car and sustainable travel. • Rail discount scheme. • Transport Targets for public transport, reducing single occupancy trips and kiss and fly. • Expectations for the publication of the Surface Access Strategy and Travel Plan. • Airport Bus and Coach Station Improvements. <p><u>Skills, Education and Employment</u></p> <ul style="list-style-type: none"> • Continue to maintain, support and participate in the Stansted Airport Employment Forum. • Review the Stansted Training Employment Strategy and continue to do so every 4 years. • Continue to provide an Education Centre to benefit local children. • Employment Academy – to continue to assist access to employment at the airport and assist job seekers. • Further Education College – continue to operate the Further Education College on site with Harlow College delivering Level 2 STEM subjects targeting the aviation sector. • Continue to offer Local Supply Chain Support to assist local businesses and operators. <p><u>Community Trust</u></p>

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			<ul style="list-style-type: none"> • Provide for the Community Trust including STAL providing funds. <p><u>Air Quality and Ecology</u></p> <ul style="list-style-type: none"> • Continually monitor oxides of nitrogen and fine particulate matter (PM10 and PM2.5) at certain agreed sites. • Monitor nitrogen dioxide using diffusion tubes at certain locations. • Consult UDC regarding appropriate measures to compensate for any adverse effects on vegetation within Hatfield Forest and/or Eastend Wood. <p><u>Surface Water Discharge</u> Implement watercourse monitoring scheme.</p> <p>Similarly ECC would also recommend that consideration is given to the most recent terminal transformation planning permission (reference -) as that also contains some key provisions that may assist shaping this policy.</p> <p>In terms of considering further growth proposals it is recommended that in reviewing the content and structure of this policy that consideration is given to in particular to the following Department for Transport policy and guidance -</p> <ul style="list-style-type: none"> • Airport National Policy Statement: New Runway Capacity and Infrastructure at Airports in the South East of England (2018), and • Beyond the Horizon the Future of UK Aviation – Making Best Use of Existing Runways (2018). <p>Furthermore the policy and supporting text should also highlight a need to consider the matters that will assist in the airport acting as a multi modal transport hub. The importance of partnership working and a recognition of the role that the Transport Forum can play in assisting to deliver a quality</p>

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			multi modal transport hub that works for the airport and for the wider Essex community.
Para 6.35	R	ECC considers that provision should be made for east west Passenger transport movements in and out of London Stansted Airport via dedicated rapid transit routes linking the airport to existing sites and new proposed strategic sites.	ECC recommends the paragraph be amended to ensure that the Local Plan seeks to provide for east west Passenger Transport movements in and out of Stansted Airport via dedicated rapid transit routes linking the airport to existing sites and new proposed strategic sites.
Para 6.35	R	ECC acknowledges that this paragraph refers to a proposed 'Sustainable and Public Transport Hub' located between Takeley and Great Dunmow.	ECC recommends that this reference be removed given the case for the Bus Rapid Transit system is not considered feasible. Further discussions to take place with ECC as the Highways and Transportation Authority.
Core Policy 12: Stansted Airport Countryside Protection Zone	GC	<p>ECC notes that policy S8 in UDC's 2005 Local Plan entitled The Countryside Protection Zone states "The area and boundaries of the Countryside Protection Zone around Stansted Airport are defined on the Proposals Map. In the Countryside Protection Zone planning permission will only be granted for development that is required to be there, or is appropriate to a rural area. There will be strict control on new development. In particular development will not be permitted if either of the following apply:</p> <p>a) New buildings or uses would promote coalescence between the airport and existing development in the surrounding countryside;</p> <p>b) It would adversely affect the open characteristics of the zone".</p> <p>ECC notes that within the Aviation National Policy Statement emphasises the need to take into account the land use including open space, green infrastructure and the green belt. Whilst ECC acknowledge that the CPZ does not form part of Green Belt policy it has sought to protect the rural nature of the environment within it. Within the Local Plan supporting text in paragraph 6.32 highlights that the</p>	ECC recommends that if UDC are considering amending the CPZ that any amendment should seek to assess the impact of the changes with reference to the CPZ's role as outlined in policy S8 of the 2005 Local Plan. In seeking to continue the application of this policy within the current draft Local Plan shows that there may be merit in this policy provision, and therefore any amendments should undertake an assessment proportionate to the scale of any development proposed.

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		justification for redesignating the CPZ is to facilitate strategic housing and employment development to 'maximise opportunities for sustainable travel'. In the original policy provisions for the CPZ this not a plausible justification for a revision.	
Para 6.39	R	ECC recognises the potential that car clubs and car sharing can deliver. They should be promoted, together with provision for electric car use and charging.	ECC considers that this paragraph should facilitate the delivery of car sharing and car clubs with the provision for electric car use and charging.
Para 6.42 – 6.49 Core Policy 15: Green and Blue Infrastructure in the South Uttlesford Area	S	Para 6.44 must be strengthened for the protection of the watercourses and rivers from pollution run off. The Local Plan policy must be strongly worded with commitments for positive action, multifunctional GI enhancement and protection. Strength will be given through deleting 'should', 'consider', 'where possible', and replacing with 'must', 'required' or 'expected'. ECC notes that at the end of Core Policy iv, it seems to be either missing the end of its sentence or additional bullet points or the end of the policy?	Para 6.44 strengthen wording to – <i>"The water courses and rivers that run through this are <u>need to/ must be</u> protected with riparian vegetated"</i> ECC recommends that Core Policy 15 be reviewed as there is missing text.
Para 6.52	R	Smith's Green Conservation Area has been recently designated.	Add reference to Smiths Green Conservation Area.
South Uttlesford Areas Heritage	R	Unlike the section on North Uttlesford, this section doesn't refer to the overarching heritage policy.	Add paragraph similar to 5.42 to this section.
Chapter 7 – Thaxted Area Strategy A summary of ECC's response is set out at outset within paragraph 3.11.			
Thaxted Area Heritage	R	Unlike the section on North Uttlesford, this section doesn't refer to the overarching heritage policy.	Add paragraph similar to 5.42 to this section.
Para 7.10, Para 7.14 and Para 7.19	O / R	ECC notes that the scale of growth proposed at Thaxted is 489 dwellings. As Education Authority even if all these dwellings were built as family houses, this would be	ECC recommends that the Local Plan removes reference to a 1fe primary school and review the level of growth allocated to Thaxted to ensure the

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		estimated to generate a need for 0.7 forms of entry primary school. As set out in paragraph 5.2.5 of ECC's Developers' Guide, with no prospect of 2fe being needed, this is insufficient growth to make a new school viable. As Thaxted Primary cannot be expanded sufficiently, this level of growth is unsustainable in education terms and ECC must object to this proposal.	emerging Local Plan is sustainable in education terms, and UDC deliver on their infrastructure led policy.
Para 7.14	R	Must ensure that when locating future schools that consideration is given to the promotion and deliverability of active and safe travel. Also that transport modelling has been reviewed to assess the full implications of the schools future location.	ECC recommends that consideration is given to the delivery of active and safe travel to schools, and any traffic impacts robustly assessed to support the school allocation in the emerging Local Plan.
Para 7.20	O / R	<p>ECC does not consider that there is sufficient evidence to illustrate the suitability of the location on sustainable transportation grounds.</p> <p>ECC have outlined that there is significant difficulties of sites linking onto the B184 (and the village centre), due to the minor nature of existing roads.</p> <p>ECC are also mindful that the current bus service is unattractive for the community accessing employment and education provision.</p>	<p>Further evidence is required to understand the suitability of the site as a sustainable location for transport, before ECC can support the level of growth in Thaxted.</p> <p>ECC notes that the LCWIP study may assist to provide some support in terms of the delivery of viable walking and cycling infrastructure.</p>
Chapter 8 – Rural Strategy A summary of ECC's response is set out at outset within paragraph 3.11.			
Para 8.13	GC	ECC notes that UDC is using the Local Plan consultation for Parish Council's to propose further allocations for development or work with local communities to consider additional sites for inclusion in the Regulation 19 Local Plan. All sites must undertake appropriate assessments and be supported by relevant evidence to determine whether there	<p>ECC recommends that evidence be prepared to assess the appropriateness of any further sites considered for inclusion within the Local Plan.</p> <p>ECC welcomes further Duty to Cooperate discussions to discuss any sites brought forward and understand the infrastructure needs, deliverability and viability of any proposals.</p>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>is appropriate social, physical, and environmental infrastructure to support such proposals.</p> <p>ECC welcomes understanding the scale of growth expected on these sites. It is noted that within Core Policy 2: Meeting Our Housing Needs it states that 1000 dwellings are anticipated on non-strategic sites.</p>	
Core Policy 20: Affordable Housing on Rural Exception Sites	GC / R	ECC recommends that the policy must ensure a requirement that affordable housing integrate with the local character to prohibit it looking significantly different and distinguishable.	<p>ECC recommends the Core Policy 20, criteria (v) to require affordable housing to integrate with the local character to read:</p> <p><i>v. “the proposal is designed to respect <u>and integrate with</u> the characteristics of the local area, including the countryside setting”.</i></p>
Development Policy 1: New Developments in the Countryside	R	It is not clear if ‘setting’ in the last sentence refers to the setting of heritage assets.	Include ‘historic environment’ or ‘heritage assets’ in the list of other relevant policies in the last sentence.
Chapter 9 – Climate Change, Transport and Environment			
Climate Change			
Para 9.2	R	<p>Being resilient to a changing climate is important and should be included in the text. Resilience is different to adaptation. See extract below from London School of Economics Sept 2022 <u>What is the difference between climate change adaptation and resilience?</u> - Grantham Research Institute on climate change and the environment (lse.ac.uk):</p> <p><i>“In the context of climate change, the Intergovernmental Panel on Climate Change (IPCC) defines adaptation as the process taken to “adjust to the actual or expected climate and its effects”. Discussions on adaptation often advocate taking specific urgent actions before it is no longer reasonably possible to adapt to, minimise, or avoid harm</i></p>	Include ‘climate resilience’ in paragraph 9.2 along with climate mitigation and adaptation.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p><i>from climate change. Such measures could include building sea walls to protect people against sea level rise, installing new irrigation systems to combat water scarcity, or planting trees to reduce air pollution and cool urban areas. More rarely, adaptation may seek to take advantage of opportunities that climate change could bring, such as making new crop choices suited to the changed climate.</i></p> <p><i>On the other hand, resilience to climate change is defined as the capacity to prepare for, respond to, and recover from the impacts of hazardous climatic events while incurring minimal damage to societal wellbeing, the economy and the environment. This entails a range of actions across policy, infrastructure, services, planning, education and communication. As such, building climate resilience requires a holistic and multi-dimensional approach to enhance communities' social, human, natural, physical and financial capacities to cope with and recover from the impacts of climate change."</i></p>	
<p>Para 9.6 and 9.7</p> <p>Para 9.15</p> <p>Core Policy 22: Net Zero Operational Carbon Development</p>	R	<p>ECC notes that the NPPF Paragraph 154(a) appreciates the role GI plays in adapting to climate change e.g. carbon sequestration, lowering greenhouse gas emissions, lowering flood risk, provide shading, creating ecologically connected landscapes, and improving urban environments.</p>	<p>ECC recommends Local Plan enhanced the use of multifunctional GI and nature-based solutions for climate change mitigation and adaptation.</p> <p>ECC recommends that UDC review the 2021 report by the British Ecological Society: 'Nature-based solutions for climate change in the UK – https://www.britishecologicalsociety.org/wp-content/uploads/2022/02/NbS-Report-Final-Updated-Feb-2022.pdf</p>
Para 9.16	S / R	<p>ECC welcome the alignment of the UDC net zero operational carbon policy approach with the Essex-wide policy approach that has been developed and fully endorse the points set out in paragraph 9.16, in particularly the certainty and</p>	<p>Update paragraph to reflect that the Essex wide policy has now been published.</p>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>clarity the Essex-wide policy brings to the development industry.</p> <p>The Planning Policy Position for Net Zero Carbon Homes and Buildings in Greater Essex – November 2023 has now been published on the Essex Design Guide, and so the paragraph can be updated.</p> <p>Also, suggest that the first sentence wording is tweaked to clarify the role of the County Council and emphasise the joint working that has occurred.</p>	<p>Amend first sentence so that it says something like “UDC’s proposed policy approach to net zero operational carbon development is closely aligned with an Essex-wide policy approach being developed <u>with funding from the Essex Climate Action Commission and facilitated by the County Council’s Climate and Planning Unit in collaboration along with the local authorities of Greater Essex and the Essex Planning Officers’ Association, via the Essex Design Guide.</u>”</p>
Para 9.17 – 9.23	S	<p>Support the clear and succinct explanation and justification for the Policy net zero operational carbon development, and the reference and reliance to the Essex <u>Net Zero Evidence Base</u> published on the Essex Design Guide.</p>	Note support
Core Policy 22: Net Zero Operational Carbon Development	S	<p>ECC welcome and fully support the inclusion of Core Policy 22 Net Zero Operational Carbon Development in the UDC Local Plan.</p> <p>UDC is the first LPA in Greater Essex to embed the planning policy approach to net zero that has been developed collaboratively through the Essex Planning Officers Association with the Greater Essex local planning authorities. This work (facilitated by the Climate and Planning Unit at Essex County Council, with funding from the Essex Climate Action Commission) has developed a robust and sound evidence base that shows that building to the clearly defined net zero carbon (in operation) standard is technically feasible, financially viable and legally justified.</p> <p>The consistent, evidence-led policy approach has now been published on the Essex Design Guide and can be used by all</p>	Note support

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		<p>Greater Essex local authorities in their new and emerging local plans (and other associated planning documents and site specific strategies and plans). Publishing the policy approach also provides clarity and certainty to the development industry and other stakeholders on what we mean by 'net zero' in terms of new build development in Greater Essex. The approach also broadly aligns with policies adopted in local plans by other 'front runner' authorities such as Cornwall, Bath and North East Somerset, and Central Lincolnshire.</p> <p>Applying the policy will ensure that new homes and buildings are built to a net zero carbon (in operation) standard that delivers net zero carbon emissions from the outset, achieves operational energy balance on site and aligns with local and national climate targets.</p>	
<p>Policy 22 - Net Zero Operational Carbon Development</p>	<p>S / R</p>	<p>Suggest reviewing the policy to accurately reflect the final version of the <u>Planning Policy Position for Net Zero Carbon Homes and Buildings in Greater Essex</u> that was published in November 2023 on the Essex Design Guide.</p> <p><i>Note: Appreciate that the Planning Policy Position was in draft when UDC prepared their plan. The minor amendments between the draft and final versions were made in response to scrutiny and comment by officers from the Essex Local Authorities via EPOA Climate planning policy support group.</i></p> <p>Requirement 3: Clause ii – this clause allows larger sites, in exceptional circumstances, to meet the EUI limit as a site-wide residential average rather than by each dwelling. Consider that by including this additional clause (which is not part of the Essex-wide policy approach) it weakens the policy by introducing a possible exception, and it would also</p>	<p>Review wording in light of final published <u>Essex-wide Net Zero policy on Essex Design Guide</u>.</p> <p>As a minimum the following specific amendments are recommended:</p> <p>Requirement 1, clause i : rephrase so the requirement is to achieve a space heat demand <u>of 15kWh/m2 GIA/yr or less</u> (rather than less than 15)</p> <p>Requirement 1, clause ii: rephrase so the requirement is to achieve a space heat demand <u>of 20kWh/m2 GIA/yr or less</u> (rather than less than 20)</p> <p>Requirement 2: delete iii</p> <p>Requirement 3: delete ii</p>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>be unfair to future occupiers of homes – as it enables some homes to be built to a higher standard than others. So some would be cheaper to run in terms of energy costs than others, some would be better quality than others which seems unjust. It is unlikely to be indicated which is higher quality and which is lower quality so would be rather misleading to potential home owners/occupiers. Local plan policies don't have to cover every eventuality or exceptional circumstance, it is fine to set out a strong policy with clearly defined requirements to be met. And it is then through the Development Management process that variation can potentially occur if exceptional circumstances are demonstrated and it is justified as to why a policy cannot be met taking into account all material considerations in the planning balance. Therefore consider the clause unnecessary and recommend deletion.</p> <p>If UDC do decide to retain the clause, then what the exceptional circumstance is should be clearly identified and be very limited – otherwise it could be open to interpretation and a potentially a wide range of 'exceptional circumstances' put forward by applicants. Also what is meant by 'larger sites' should be defined.</p>	<p>Other suggestions:</p> <p>Footnote 67 – last sentence – not sure it makes sense?</p> <p>The header – 'Alternative routes to meeting policy requirements' in the policy box (page 114) needs to be made bold or italic so it stands apart from the policy text.</p>
<p>Policy 22 - Net Zero Operational Carbon Development</p> <p>Appendix 8</p>	<p>S / R</p>	<p>Support the additional information to go with Policy 22 – net zero operational carbon development, this helps maintain a consistency and clarity on the approach to net zero in Greater Essex.</p> <p>The Text of Appendix 8, which closely aligns with the supporting text contained in the Planning Policy Position for Net Zero Carbon Homes and Buildings in Greater Essex - needs some minor amendments though in order to</p>	<p>Update text to reflect the now published <u>Planning Policy Position for Net Zero Carbon Homes and Buildings in Greater Essex</u> on the Essex Design Guide</p> <p>Typo throughout Appendix 8 – policy number.</p>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		accurately reflect some changes that occurred between the draft and final versions. Also, typo - the Policy number is wrong in the Appendix 8 - should be 22 not 23.	
Para 9.24	S	Support flexibility provided in how the energy assessment information is provided – either as a standalone Energy Strategy or by forming a section within the Climate Change and Sustainability Statement required by Core Policy 1. Also support the reference to the minimum information requirements set out in the Net Zero Evidence (Report 2) on the Essex Design Guide – as this helps maintain consistency and clarity for the development industry.	Note support.
Para 9.27	S / R	This paragraph refers to alternative routes to policy compliance such as Passivhaus or BREEAM. The policy makes it clear that Passivhaus certification to a classic or higher standard is acceptable for meeting requirements 1 and 3 only. Suggest that the paragraph also makes this clear – i.e. that requirements 2,4 and 5 still need to be met. Also, concerned that the paragraph implies that BREEAM is an alternative route – in the Net Zero Evidence (<u>Report 1</u> page 32) it clearly states that it is not an acceptable alternative to meeting the policy requirements (and this is also stated in UDC local plan Appendix 8 too).	Amend paragraph to accurately reflect how Passivhaus and BREEAM relate (or not) to the Policy requirements.
Core Policy 23: Overheating	S	Support the inclusion of Policy 23 to encourage major development proposals to address overheating. Suggest that the cooling hierarchy referred to in the policy is defined.	Suggest reviewing policy phrasing in due course.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>Suggest rephrasing the policy so it is clearer as to what is required i.e. make sure measures to mitigate risk are incorporated e.g. policy to require:</p> <ul style="list-style-type: none"> • Assessment of overheating risk from current and future climate over the lifetime of the development; and • where a risk is identified, incorporate mitigation measures in the design of the development to ensure the future comfort, health and well-being of occupiers to a changing climate. <p>Suggest considering the Bristol City Council Reg 19 Local Plan consultation (Nov 2023), anticipated to be published imminently and has a similar policy. ECC would suggest alignment would be beneficial.</p> <p>Welcome the reference to the Solar design guidance published on the Essex Design Guide.</p>	
Para 9.45 – 9.47	S / R	<p>ECC recommends the use of Bio Solar is explored especially for large commercial buildings and for solar farms. This can have dual benefits for energy and biodiversity. This includes biodiversity habitat creation, water storage capacity, flood alleviation and energy saving potential. Further information can be found here: https://livingroofs.org/introduction-types-green-roof/biosolar-green-roofs-solar-green-roofs/.</p> <p>ECC also recommends that opportunities to promote biodiversity are explored for solar farms. Biodiversity can be enhanced on solar farms in a number of ways, including through the establishment of hedgerows, wildflower meadows, bird boxes, insect houses and ponds. For further guidance and information, ECCs GI team recommends: -</p>	ECC recommends consideration is given bio solar for large scale commercial buildings and strong structure like car parks and to ensure solar farms delivery BNG.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<ul style="list-style-type: none"> • <i>BREs National Solar Centre Biodiversity Guidance for Solar Developments</i>, available at: https://www.bre.co.uk/filelibrary/pdf/Brochures/NSC-Biodiversity-Guidance.pdf. This documentation outlines guidance to planners on how biodiversity can be supported on solar farms. • <i>The Longfield Solar Farm EDF study for biodiversity net-gain opportunities</i>. For more information, please contact: James Pateman, Project Manager info@longfieldsolarfarm.co.uk. 	
Core Policy 24: Embodied Carbon	S	<p>ECC welcomes reference in the draft Vision, paragraph 2 - Environmental to Uttlesford seeking to embrace changes to enable new build to be net zero ready by 2030, of high-quality design and which utilise sustainable construction and materials.</p> <p>Welcome the inclusion of the Embodied carbon policy, which closely aligns with the ‘placeholder’ policy included in the Planning Policy Position for Net Zero Carbon Homes and Buildings in Greater Essex. To help support this policy and guide / refine the approach an Embodied Carbon Study for Greater Essex has been commissioned with funding from the Essex Climate Action Commission. The purpose is to develop a Essex-wide planning policy approach to reducing Embodied carbon emissions from new development and the evidence base to support it. The Study commenced mid-November 2023 and is due to report in April 2024.</p> <p>As the Mineral and Waste Planning Authority (MWPA), ECC seeks to ensure that the design and standard of any new development should aim to meet a high level of sustainable design and construction including measures which minimise</p>	Refine in due course to reflect the findings of the Embodied Carbon Study for Greater Essex – due April 2024.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		waste reduction, re-use and recycle minerals, and use sustainable materials, including in relation to their procurement and be optimised for energy efficiency, targeting zero carbon emissions. This is implemented through the Essex Mineral Plan Policy S4- Reducing the use of mineral resources, which can be viewed here and forms part of the UDC Local Development Plan. This policy will help in implementing MLP Policy S4.	
Core Policy 25: Renewable Energy Infrastructure	S	<p>Support the encouraging policy towards renewable energy development. However, consider that the policy could be strengthened to be more proactive and help enable the increased renewable energy capacity required (as recognised in Para 9.45).</p> <p>Para 9.46 supports standalone solar pv on previously developed land and where they do not occupy highest grade agricultural land. Suggest that what is meant by the “highest grade” is clarified, and also whether this means that support will be given to proposals on lower grade agricultural land that is not previously developed? It seems unclear in the policy as currently written.</p> <p>Suggest that reference is made to the Renewable Energy spatial mapping data that is held by the County Council and indicate an intention to work with this data to refine the policy and use it to support the spatial expression of the local plan policy? It can also help identify opportunities for community led energy projects.</p> <p>Para 9.47 is positive for wind energy development but explains that to be acceptable (under NPPF requirements) sites / areas must be identified as suitable in local plans</p>	Refine policy to be more proactive and clear on where new renewable energy development will be supported, and take forward and refine the renewable energy spatial mapping data held by the ECC Low carbon and energy team to assist with the identification of suitable areas for wind development.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>and/or SPDs. It explains that lower landscape value areas would be suitable but must be considered against a list of criteria. However, there aren't any areas mapped as suitable in the UDC local plan to accompany the policy, so it is unclear how the policy will deliver additional wind energy development.</p> <p>Suggest that the policy is reviewed by taking forward the renewable energy spatial mapping data held by ECC and which can be made available to Uttlesford to refine further.</p>	
Transport			
Para 9.50	R	ECC recommends that public transport use should be categorised alongside walking and cycling as a method of reducing car travel. For further justification see comments expressed for para 9.61 and Para 9.69.	ECC recommends that the paragraph be redrafted to ensure that public transport use is categorised alongside walking and cycling as a method of reducing car travel.
Para 9.51	R	<p>ECC notes that this paragraph states <i>"reducing the need to travel by proposing and supporting development proposals which reduce the need to travel or promote the use of sustainable transport will support the district wide carbon reduction targets"</i>.</p> <p>ECC wishes to highlight that school run traffic is a significant contributor to trip rates. It is noted that the spatial strategy proposed does not appear to have considered secondary school transport. The new school proposed in Takeley is to meet district wide, rather than purely local, growth.</p>	<p>ECC recommends that further consideration is given to the spatial strategy proposed. Housing growth locations should be matched to the capacity of local schools to accommodate additional pupils. Larger allocations that support the establishment of new schools should be considered where appropriate.</p> <p>Furthermore the sentence should be referring to reducing the need to travel <u>by car</u>, not to travel as this would be more challenging to achieve.</p>
Para 9.55	R	See comments paragraph 6.22.	ECC recommends that Stansted airport be consistently referred to as a multi modal interchange throughout the Local Plan.
Para 9.61 and Para 9.69	GC / R	ECC considers that it is imperative the Local Plan seeks to address the challenge of reducing car dependency. ECC draws attention to Transport East's adopted <u>Transport Strategy to 2050</u> (2022). This Strategy sets a single regional	ECC recommends that the Local Plan must give further thought to mechanisms that will seek to reduce car dependency and assist in increasing active and sustainable travel.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>voice for transport investment and supports the acceleration of regional transport priorities. Of particular relevance here is the second goal, which seeks to; “shift modes by supporting people to switch from private car to active and passenger transport, and goods to more sustainable modes like rail”.</p> <p>It should also be noted that from 1st of June 2023, Active Travel England (ATE) became a statutory consultee on all planning applications for developments equal to or exceeding 150 housing units, 7,500 m² of floorspace or an area of 5 hectares. ECC liaise with ATE to help achieve a step change in walking, wheeling and cycling infrastructure on all future large developments, enabling more people to make healthier, greener and cheaper travel choices.</p> <p>Large scale development and garden communities will be required to identify modal split targets (the number of trips by walking, cycling, public transport and private vehicle) which need to be agreed by ECC, as the highway and transport authority, and the Local Planning Authority.</p> <p>Clearly a priority for this emerging Local Plan is seeking to understand how the spatial strategy and pattern of future development will seek to facilitate the modal shift from the private car to active and sustainable modes. Assisting in delivering on challenging modal shift targets particularly within the larger housing and employment allocations throughout the district.</p> <p>It is therefore important that new development is located in places that do not add to this car despondency and are</p>	

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		designed to enable the long term sustainability of transport provision.	
Para 9.61	GC / R	In reviewing the Local Plan it is apparent that further attention should be given to ensure the needs to residents that cannot drive or do not have access to a car. This is important for equality of opportunity for all and given the ageing population.	ECC recommends that the Local Plan seeks to ensure there are opportunities for alternative modes to the private car, in particular for those residents that do not have access to a car or cannot drive.
Para 9.62	GC	<p>ECC notes that this section of the Local Plan makes no reference to the Local Transport Plan (LTP). ECC, as the highway and transportation authority, has a statutory requirement to develop a LTP that <i>“includes policies for the promotion and encouragement of safe, integrated, efficient and economic transport facilities and services to, from and within their area, that are required to meet the needs of persons living or working in the authority’s area, or visiting or travelling through that area, including those required for the transportation of freight”</i>.</p> <p>The current LTP (LTP3, 2011) is the Essex Transport Strategy (LTP3) and should be followed when planning and delivering development in Essex.</p> <p>ECC has commenced the preparation of LTP4 covering the following three strategic themes:</p> <ul style="list-style-type: none"> • Supporting People, Health, Wellbeing, and Independence <ul style="list-style-type: none"> a) People have inclusive and affordable access to key services. b) Improve physical and mental health and wellbeing. c) The transport network is safe, and feels safe, for all users 	ECC recommends that this section of the Local Plan must reference the Local Transport Plan and depending on the timescales for the Regulation 19 Local Plan, possibly some of the information from LTP4 which is currently being developed. ECC can liaise with UDC to ensure that emerging Local Plan policies are consistent with the emerging LTP4.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<ul style="list-style-type: none"> ● Creating Sustainable Places and Communities <ul style="list-style-type: none"> a) All places support the transport needs of all residents b) Work with appropriate partners to design sustainable developments from the start c) Reduce transport's impact on the environment ● Connecting People, Places and Businesses <ul style="list-style-type: none"> a) Maximising the business potential of Essex b) People have inclusive and affordable access to education, employment and training c) Transport network has a secure and long-term future <p>LTP4 will reflect and formally incorporate the revised policy framework contained within <u>Net Zero: Making Essex Carbon Neutral</u> (ECAC) and the <u>Transport East: Transport Strategy</u>. These place a greater emphasis upon the provision and use of sustainable transport and the decarbonisation of the transport network.</p> <p>LTP4 will be based upon the above revised Place and Movement Approach which will inform the preparation of supporting Implementation Plans (area based) that will cover both the longer-term pipeline of projects and a shorter-term transport programme. It will also comprise a number of activity-based documents including the Bus Service Improvement Plan (BSIP); Sustainable Travel Planning; EV Charging Strategy; LCWIPs; Transport Technology Strategy; Network Management Plans and Maintenance Strategies. These will inform Local Plan preparation and other ECC plans and strategies.</p> <p>LTP4 will require the existing transport <u>Development Management Policies (2011)</u> to be updated as the adopted</p>	

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		policies primarily assess proposals against the current Functional Route Hierarchy. Policies will be updated to assess proposals against the proposed new Place and Movement approach (currently in preparation).	
Para 9.64	GC	ECC acknowledges the role that active travel can play in enhancing physical and mental health of the community. It is recommended that this is acknowledged throughout the Local Plan, and within this paragraph.	ECC recommends that the Local Plan uses the opportunity to demonstrate the role active travel can have for physical and mental health of the community.
Para 9.65	R	ECC notes that the paragraph refers to ‘residential roads’ for clarity it is recommended that the place/movement function of the road is referenced and the sentence re-worded.	ECC recommends the sentence be amended to read - <i>“will be designed to best manage vehicle speeds appropriately reflecting the place/movement function of that road”</i> .
Para 9.73	R	ECC notes that this paragraph focuses on roads and highways, it is recommended that the emphasis should be on “transport” and the enabling of movement of people and goods by a range of modes.	ECC recommends that this paragraph be redrafted and the emphasis altered to reflect a choice of transportation modes.
Para 9.65 Core Policy 26: Providing for Sustainable Transport and Connectivity	R	<p>ECC aims to ensure that appropriate consideration is given to the layout and design of streets, and routes to facilitate bus travel. Attention is drawn to the Essex Design Guide, Highways Technical Manual and in particular the <u>Street Types Table</u> which outlines the key design features of streets and the numbers of dwellings they should serve.</p> <p>ECC recommends that UDC note the following when considering new developments -</p> <ul style="list-style-type: none"> • New development should seek to maximise the incorporation of bus service provision and its supporting infrastructure at the earliest stage including the master planning of developments. • Development proposals will be required to demonstrate that the service is of high quality and frequency accessible by quality pedestrian and cycle 	<p>ECC consider that the policy and supporting text must be strengthened to ensure that further consideration is given to the needs of bus travel, to promote and facilitate its future use within the district.</p> <p>ECC recommends that this policy be widened to include a range of sustainable transportation modes.</p> <p>ECC recommends ongoing engagement with the Highway and Transportation Authority to review this policy and align with any updated evidence.</p>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>routes and providing access to wider key destinations and funded by the developer from first occupation.</p> <ul style="list-style-type: none"> • New developments, as necessary, will be required to provide a S106 contribution towards the operation of a new service and/or contribution to an amended service to incorporate the demands arising from the development. The period of funding should be set out in the S106 agreement to provide a commercially viable service. • New development must accommodate the needs of bus users in terms of bus routes and stops and bus priority measures, real time digital information displays where appropriate. • Bus priority measures should consider the need for bus gates, lanes and bus only routes. • Higher density development will be encouraged at locations with good access to public transport. Passenger transport routes, RTS routes and bus priority routes should be safeguarded where possible. • Incentives should be provided to new residents via travel packs including initial free travel and discounts thereafter. A single fare zone within developments should be considered. • Provision should also be given to requirements for refuelling and charging of buses and RTS vehicles. • Modern forms of RTS should be maximised where they are deemed to be suitable and viable. New locations for development should be considered in locations close to existing and proposed public transport connections, including RTS. 	

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		<ul style="list-style-type: none"> Large scale development will be expected to be accompanied by a Public Transport Strategy detailing how public transport will be designed, delivered, funded, and operated for a period of at least 20 years. The Strategy should include vehicle specifications, route timetables, service frequencies and all associated infrastructure (e.g., bus stops, bus priority and RTS interventions). It should be submitted to ECC, as the Highway Authority, at the time of the planning application submission. <p>ECC has published the First Annual Review (January 2023) of the ECC Bus Service Improvement Plan 2021 which can be viewed here.</p> <p>In reviewing the policy ECC are concerned at the lack of reference to all modes of sustainable travel. It is predominately walking and cycling focussed. It should be noted that the Essex Climate Action Commission (ECAC) recommendations endorse the decarbonisation of transport and seeks to achieve net zero carbon transport emissions in Essex by 2050. Emerging transport strategy for Essex will now comprise an Avoid, Shift, and Improve approach:</p> <ul style="list-style-type: none"> Avoid: to encourage residents to avoid or reduce unnecessary private car journeys through changing travel behaviour with regards how and why we are travelling. Shift: to embrace a shift in the use of active and sustainable modes of transport such as walking, cycling, and taking the bus or train to encourage their use and reduce pollution and congestion. 	

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<ul style="list-style-type: none"> • Improve: where road journeys are essential vehicle efficiency needs to be improved by making alternatively fuelled options, such as electric vehicles. It must be made easier for people to take alternative methods of transport and to improve their reliability and quality. <p>Similarly the ECC <u>Sustainable Modes of Travel Strategy</u> outlines the steps being taken to enable accessibility to place of employment and education for all, including other neighbourhood services such as retail and leisure; with the associated health, social and economic benefits of using alternative modes of transport.</p> <p>As mentioned in comments to para 4.8, ECC would also draw attention to the future of flight technologies.</p>	
Para 9.79	R	<p>ECC notes reference to travel plans. ECC is preparing a ‘Travel Plan Toolkit and Guidance for Travel Demand Management in Garden Communities’ to focus on achieving and maintaining higher mode share targets for active and sustainable travel. Travel Plans will need to identify and deliver the sustainable transport interventions, behaviour changes to meet the 60% active mode share targets and travel planning mechanisms to ensure development becomes net zero carbon transport and how they can be measured through a monitoring plan. A monitoring plan should be prepared reporting annually on performance against Modal Share Objectives with the latter set out as a planning obligation. Proposals will be required to appoint a Travel Plan Co-ordinator for both residential and employment development partly responsible for establishing marketing and incentive measures including</p>	<p>ECC recommends that the local plan includes a travel plan policy and wording to be considered includes –</p> <p><u>“Travel Plans Policy</u> <i>All developments that generate significant amounts of movement will be required to produce a Travel Plan having regard to the thresholds in Essex County Council published guidance.</i></p> <p><i>The Travel Plan will need to identify and deliver the sustainable transport interventions, behaviour changes and travel planning mechanisms required to ensure the development reduces carbon emissions to become net zero and achieve modal split targets.</i></p> <p><i>Proposals must include an appointment of a Travel Plan Co-ordinator and provide Travel Packs for new residents including information on public</i></p>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		initial free use of car clubs, bus travel for first year, Sustainable Travel Rewards Scheme. Digital travel information should be made available to all residents and occupiers across a development site.	<i>transport discounts, bike/e-bike/e-scooter hire schemes, car clubs and car sharing schemes. Suitable digital travel information should be made available to all residents and occupiers across the development and keep up to date details of all active and sustainable travel information.</i> <i>Any Travel Plan should include an Action Plan setting out specific actions, timelines and targets to be monitored and reviewed annually”.</i>
Para 9.83	R	ECC notes that this paragraph refers to active travelling being an important consideration “ <i>in all planning decisions</i> ”. It is important that it is also for the <u>design</u> process, and this should be reflected within the plan.	ECC recommends that the sentence be amended to read – <i>“planning decisions <u>and the design process</u>”.</i>
Core Policy 27: Assessing the Impact of Development on Transport Infrastructure	R	Similarly to the comments expressed to Core Policy 26 – Core Policy 27 also must also include reference to a range of modes. It is bus dominated and should include reference to walking and cycling. ECC recommends that bullet iii reference cycle desire lines. Desire lines represent the shortest and/or more obvious routing, it is recommended that cycling and walking infrastructure should reflect, as closely as possible natural desire lines.	ECC recommends that the policy be redrafted to include reference to all sustainable and active modes of travel. ECC recommends that bullet iii reference cycle desire lines.
Para 9.81- 86 Core Policy 28: Active Travel – Walking and Cycling	R	ECC acknowledges some of the guidance that has been developed by Sport England. Sport England have prepared the <u>Sport England Active Design Principles</u> . The guidance and principles set out how the design of environments can assist people to lead more physically active and healthy lives – creating an active environment. The Sport England checklist has been adapted and embedded into the <u>Essex Healthy Places Guidance</u> which is part of the Essex Design Guide.	ECC recommends that the supporting text and Core Policy 28 is reviewed and information from the guidance from Sport England and/or the Essex Design Guide used to enhance the policy delivery.

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Para 9.80	R	ECC acknowledges that when providing additional bus stops on existing bus routes they must be integrated to minimise disruption and lengthening of journey time for those in existing developments.	ECC recommends that this paragraph must be amended to state that additional bus stops on existing bus routes must be integrated to minimise disruption and lengthening of journey time for those in existing developments.
Core Policy 28: Active Travel – Walking and Cycling	R	<p>ECC notes that within the <u>Developers’ Guide</u> there is a key aim to establishing a safe environment around schools, which is conducive to learning. This should be captured within this policy. To assist attention is drawn to the Developers’ Guide which states that “<i>the following issues / measures should be considered:</i></p> <ul style="list-style-type: none"> • <i>establishing and improving walking and cycling routes to schools (including off site provision);</i> • <i>reducing school run traffic and dispersing it away from school entrances;</i> • <i>enforcing low traffic speeds around schools and the walking routes pupils use;</i> • <i>school zones’ where traffic is restricted in the area at the start and the end of the school day;</i> • <i>ensuring pavements around schools are clear and wide enough for parents with pushchairs to pass (three meter minimum width);</i> • <i>substantial pedestrianised zones around school entrances used by pupils;</i> • <i>providing public art, nature areas and local history information boards, in the immediate area, to offer learning opportunities;</i> • <i>the planting of trees and / or hedges to enhance air quality / reduce exposure to poor air quality; and</i> • <i>the use of landscaping and carefully selected street materials to reduce noise”.</i> 	ECC recommends that information from the ECC Developers’ Guide to Infrastructure Contributions must be reviewed, and ensure that the policy provisions are consistent with the guide. In particular ECC wants to see reference to the environment around schools and, the need for new school frontages to be traffic free and linked to the active travel network. Please refer to the comments ECC made to the UDC Draft Design Code on this matter.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		A key aim should be to improve the environment around schools. Good practice is summarised on page 39 of the Guide.	
Core Policy 29: Electric and Low Emission Vehicles	S	ECC aims to ensure that there is equality of opportunity for all. It is recommended that further consideration be given to the policy to ensure that there is equality of access to future electric vehicle charging. ECC are keen to ensure that there is no disparity in opportunity for residents, and that homes where charging units are not easily provided are expected to pay more for public charging.	ECC welcomes working with UDC to seek to ensure the emerging Local Plan delivers equitable access to EV charging.
9.91	S / R	<p>ECC notes that there is no reference Essex Parking Standards. The <u>Essex Parking Standards (2009)</u> provides guidance on parking standards for local areas. These standards can have an impact on the quantum of development that can be provided and are presently being reviewed by the Essex Planning Officers' Association (EPOA). It is important to note that these Parking Standards are being updated and consultation closed December 2023. EPOA will advise local authorities of consultation responses and when updated standards are finalised.</p> <p>It must also be noted that the <u>Essex Parking Policy</u> sets out ECC's policy regarding on-street parking which is used by police enforcement and local authority enforcement.</p>	ECC recommends that this section refers to Essex Parking Standards.
Para 9.96 – 9.99 Core Policy 32: The Movement and Management of Freight	R	ECC notes that there is no reference to freight, within "The Movement and Management of Freight" section of the Local Plan. Given the role that Stansted plays as a key freight interchange it is important that the Local Plan and relevant policy provisions shape the future for air freight and associated transport movements within the Local Plan.	ECC recommends that the supporting text and the policy be amended to ensure appropriate consideration is given to air freight and associated transport movements in and around Stansted.

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Core Policy 33: Managing Waste	S / R	<p>ECC welcomes reference in paragraph 1 of the policy to support proposals for sustainable waste management facilities as identified in the Essex Minerals Local Plan (2014) and Essex and Southend-on-Sea Waste Local Plan (2017). ECC also support reference to the need to prepare a Waste Management Plan for major development proposals in paragraph 5.</p> <p>However, to aid clarity reference should be made in paragraph 5 for <u>Site</u> Waste Management Plans (SWMPs) for major development proposals to be prepared <u>in accordance with Policy S4 of the adopted Minerals Local Plan (MLP)</u>, which forms part of the UDC Local Development Plan. Policy S4 requires the applicant to demonstrate compliance with the notion of sustainable development, circular economy principles and the application of MLP Policy S4. These are encouraged for developments over 100 dwellings.</p> <p>ECC can advise on the requirements of SWMPs, which should include the following issues:</p> <ul style="list-style-type: none"> • present a site wide approach to address the key issues associated with sustainable management of waste, throughout the stages of site clearance, design, construction and operation, • establish strategic forecasts in relation to expected waste arisings for construction, • include waste reduction/recycling/diversion targets, and monitor against these, • advise on how materials are to be managed efficiently and disposed of legally during the construction phase of development, including their segregation and the 	<p>To aid clarity, ECC recommend the following amendment to paragraph 5 to read:</p> <p><i>A <u>Site</u> Waste Management Plan should be submitted for Major development proposals setting out how the above requirements have been met <u>in accordance with Policy S4 of the Minerals Local Plan</u>. Innovative solutions to minimise waste at source will be supported.</i></p>

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		identification of available capacity across an appropriate study area.	
Para 9.106 – 9.109 Core Policy 34: Water Supply and Protection of Water Resources	S / R	ECC are currently developing the Essex Water Strategy anticipated to be published in early 2024, which aims to influence and support the direction taken in regard to water conservation.	ECC recommends that reference is included to the emerging Essex Water Strategy and ECC can advise UDC of key recommendations and relevant content for the Local Plan as plan preparation continues - https://flood.essex.gov.uk/climate-adaptation-and-mitigation/essex-water-strategy/
Para 9.107 Core Policy 34: Water Supply and Protection of Water Resources	R	ECC notes that the policy refers to a water efficiency target that exceeds that outlined in DEFRA guidance. The policy also references Building Regulations G2, however, the actual target referenced in building regulations varies from that, that in this policy. The supporting text quotes alternative water efficiency targets. ECC considers that clarification is required to ensure that UDC are developing an approach to water efficiency that is consistent with national policy, and/or evidenced.	ECC recommends that UDC clarify the approach to water efficiency/target to ensure consistency with national policy, and/or appropriately evidenced within the Local Plan.
Para 9.126	R	This county-wide partnership project no longer exists.	Delete reference to the Essex Biodiversity Project.
Para 9.126	R	The Local Plan must reference the Essex Local Nature Partnership (LNP) and Greater Essex Local Nature Recovery Strategy. In March 2022, the LNP was established. The LNP is an independent body to that of ECC that meet quarterly (for further details, please visit: Essex Local Nature Partnership). The x LNP has committed to the delivery of four key targets: -	ECC recommends that reference must be included to the Essex Local Nature Partnership and Greater Essex Local Nature Recovery Strategy.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<ol style="list-style-type: none"> 1. 25% of all land in Essex will enhance biodiversity and the natural environment by creating natural green infrastructure. (This is an ECAC target that has been adopted by the LNP) 2. 50% of all farmland in Essex will adopt sustainable land stewardship practices by 2030 (This is an ECAC target that has been adopted by the LNP) 3. For the LNP adopt the Wildlife Trust's 1-in-4 programme to engage residents with Nature and achieve a 25% engagement level. 4. Accessible Natural Green Space Standards (ANGSt) target for everyone to have access to high quality natural space close to home and work. <p>Greater Essex Local Nature Recovery Strategy (GELNRS) ECC is the 'Responsible Authority' for delivering the GELNRS but works closely with the LNP to provide direction and ensure key stakeholders are engaged. The GELNRS is being prepared for completion by early 2024. The GELNRS will form the baseline for habitat information, which in turn will generate action to promote biodiversity management and improvement.</p>	
Para 9.128	S and GC	<p>ECC supports the inclusion of Local Wildlife Sites, Local Geological Sites and Special Verges.</p> <p>The suite of non-statutory wildlife sites across the whole of Essex are called 'Local Wildlife Sites'. This is how they are termed within the Local Wildlife Sites (LoWS) review 2021, which has recently been ratified by the Essex Local Sites Partnership. This would also ensure consistency with their reference within paragraph 9.130. NB all Special Verges are also designated as LoWS in the 2021 review.</p>	<p>ECC recommend reference to 'County Wildlife is deleted and reference made to - Local Wildlife Sites' or 'LoWS'.</p> <p>Amend paragraph to refer to Local Nature Reserves (LNRs) being a <u>statutory designation</u> made under Section 21 of the National Parks and Access to the Countryside Act 1949 by principal local authorities: <u>Local Nature Reserves (England) - data.gov.uk</u>.</p>

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Para 9.129	GC	https://magic.defra.gov.uk/MagicMap.aspx	ECC recommend that reference should also be made to the two National Nature Reserves (Hales Wood and Hatfield Forest) also being designated as Sites of Special Scientific Interest.
Para 9.132	R	<p>Government advice states that: “Public authorities who operate in England must consider what they can do to conserve and enhance biodiversity in England. This is the strengthened ‘biodiversity duty’ that the Environment Act 2021 introduces” (S102). This means that, public authorities must:</p> <ol style="list-style-type: none"> 1. Consider what can be done to conserve and enhance biodiversity. 2. Agree policies and specific objectives. 3. Act to deliver policies and achieve objectives. <p>Government advice states that: “You must complete your first consideration of what action to take for biodiversity by 1 January 2024. You must agree your policies and objectives as soon as possible after this. You must reconsider the actions you can take within 5 years of when you complete your previous consideration.”</p> <p>The Nature Recovery Network (NRN) is a major commitment in the <u>Government’s 25 Year Environment Plan</u> and enacted by the Environment Act 2021: (https://www.gov.uk/government/publications/nature-recovery-network/nature-recovery-network)</p> <p>Species conservation strategies are established by the Environment Act 2021. They aim to safeguard the future of the species that are at greatest risk.</p>	<p>ECC recommends that reference to Living Landscapes are removed as they are no longer promoted by Essex Wildlife Trust.</p> <p>ECC recommends that paragraph 9.132 explicitly refers to ‘Nature Recovery Networks’ in addition to the <u>Essex</u> Local Nature Recovery Strategy. There will also ultimately be an ‘Ecological Networks Plan’, as required under the Environment Act 2021.</p> <p>UDC may wish to include reference to Species Conservation Strategies, which are also part of the Environment Act 2021.</p> <p>The following sentence should be removed: <i>“Advice on incorporating biodiversity in developments can be found on the Essex Biodiversity Project website⁶¹”</i></p>

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		<p>The strategies will find better ways to comply with existing legal obligations to protect species at risk and to improve their conservation status. https://www.gov.uk/guidance/complying-with-the-biodiversity-duty#actions-you-could-take A current example relevant to Uttlesford is 'Great Crested Newts District Level Licensing'.</p> <p>The Essex Biodiversity Project county-wide partnership project no longer exists. The referenced web page in this paragraph is no longer available.</p>	
Para 9.135	R	<p>https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england</p> <p>The List of priority habitats and species in England ('Section 41 habitats and species') is for public bodies, landowners and funders to use for biodiversity conservation. public bodies – to help them meet their '<u>biodiversity duty</u>' to be aware of biodiversity conservation in their policy or decision making.</p> <p>The <u>biodiversity duty</u> will be strengthened by S102 of the Environment Act. The list can be found here: Habitats and species of principal importance in England - GOV.UK (www.gov.uk)</p> <p>The action taken for biodiversity will contribute to the achievement of national goals and targets on biodiversity. The <u>Environmental Improvement Plan (EIP23)</u>, published in January 2023, sets out government plans for significantly improving the natural environment.</p>	<p>It is recommended that reference is made to Priority species in this paragraph.</p> <p>It is not clear what Expansion zones refer to in the context of this paragraph. Reference should therefore be made to Government's National Habitat Network shown on Magic maps for Priority habitats and Network Expansion Zones and Network Enhancement Zones.</p>

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Para 9.139	S / GC	ECC supports inclusion of the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) in accordance with adopted Essex Coast RAMS Supplementary Planning Document. But a minor wording change is recommended.	We recommend that “Residents of Uttlesford have access to <u>protected</u> wildlife habitats” is altered to insert “ <i>internationally designated</i> ” in place of “ <i>protected</i> ”. In the NPPF these are referred to as Habitats sites (paragraph 181).
Core Policy 38: The Natural Environment	S	ECC welcome this proposal due to the poor condition of chalk streams in Uttlesford, and nationally. We support the requirement of a Chalk Stream Impact study for development proposals within the river basin or near to the chalk stream.	It is recommended that chalk streams are identified on a map with the Local Plan. They are identified on https://magic.defra.gov.uk/
Core Policy 38: The Natural Environment	GC / R	<p>A series of recommendations are made to ensure consistency, clarity and to refer to the correct name of legislation.</p> <p>Irreplaceable habitats: Para 180 of the NPPF 2023. Also https://defralanduse.blog.gov.uk/2023/10/05/irreplaceable-habitats-and-bng-what-you-need-to-know/</p> <p>Protection of Hatfield Forest We welcome inclusion of the emerging Strategic Access Management and Monitoring Strategy with respect to recreational usage of the Forest.</p>	<p>Consistency of names is required i.e. international sites, Habitats sites and European sites are all being used interchangeably. In the NPPF these are referred to as Habitats sites (paragraph 181).</p> <p>The Conservation of Habitats and Species Regulations 2017 (as amended) should be referenced, rather than ‘the Habitats Regulations’.</p> <p><i>“An ecological survey will be required to be submitted with the application if the development site affects or has the potential to affect any of the following:</i></p> <ul style="list-style-type: none"> <i>an internationally designated site, for example Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site”.</i> <p>Bullet points i) to iv) should not be included under the Essex Coast RAMS section as they are not relevant to it; they should be moved up to the first paragraph (copied above). These bullets should also include Special Verges and Priority species.</p> <p>Bullet iv) Protected species are distinct from species on the Red Data list; this should be clearer.</p>

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			<p>The correct strategy name is Essex Coast Recreational disturbance Avoidance and Mitigation Strategy.</p> <p><i>“measures should include making a contribution to the network of biodiversity sites”</i>. This section of the Policy should also include the Essex Local Nature Recovery Strategy.</p> <p>Remove reference to ‘<i>offsetting</i>’ throughout and replace with ‘<i>Biodiversity Net Gain</i>’.</p> <p>Protection of Priority habitats: Irreplaceable habitats are given greater policy protection than other Priority habitats and the LPA should make this distinction and give greater weight to irreplaceable habitats. Please refer to Para 180 of the NPPF 2023 for further information.</p> <p>Protection of Hatfield Forest We note that an employment allocation is proposed almost immediately north of Hatfield Forest NNR (north of the B1256) as shown on Fig 6.1 Area Strategy Map (South Area). The potential for impacts through construction and operational use should also be considered. This is currently arable field and will have restrictions from Natural England. There may be conflicts with Core policy 48.</p>
Core Policy 38: The Natural Environment	GC	ECC supports habitat creation and nature recovery but is mindful that ‘hazards’ should be minimised. Accordingly, ECC recommends that emerging policies consider the needs of safeguarding with reference to the existing and future needs of airfields. Bird strike is an issue that must be considered near airfields, and therefore in developing future BNG policies, consideration should be given to BNG locations, particularly where larger off-site solutions are	<p>ECC recommends that due consideration be given to airport safeguarding when considering policies for habitat creation.</p> <p>ECC recommends the policy give consideration to determining statutory consultees for BNG proposals and ensuring that appropriate aviation consultees are aware of any future proposals to provide them with the opportunity to highlight any matters in relation to safeguarding.</p>

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<p>Para 9.140 – 142</p> <p>Core Policy 39: Green and Blue Infrastructure</p>	<p>S / R</p>	<p>proposed, as their proximity to airfields will likely attract birds, which can be a hazard.</p> <p>ECC welcomes and supports the inclusion of the GBI Policy and provides recommendations to strengthen the policy.</p> <p>ECC recommends reference is made to the Essex Design Guide for design of GI and to the Essex Green Infrastructure Standards (2022), which should be used as part of the Plan's evidence base and have been endorsed by Natural England and awarded Building with Nature Policy accreditation, 2023.</p> <p>The Essex GI Standards outlines nine principles and standards for the protection, enhancement, creation, and management of GI in Essex. The application of these principles and standards through development management and planning policy will help ensure the delivery of multifunctional, accessible high-quality GI from development.</p> <p>Essex GI Principles and Standards:</p> <ol style="list-style-type: none"> 1. <i>Mainstreaming and Integration</i> 2. <i>Evidence-Led</i> 3. <i>Multifunctionality</i> 4. <i>Early Engagement</i> 5. <i>Managing Different Expectations</i> 6. <i>Health, Wellbeing and Social Equity</i> 7. <i>Connectivity</i> 8. <i>Strong Policy Wording and Commitment and,</i> 9. <i>Stewardship</i> 	<p>ECC recommends reference to Essex Design Guide and the Essex GI Standards to set the minimum standards expected from developments.</p> <p>Paragraph 4 of the Core Policy 39 must include reference to Essex GI Standards as part of the checklist.</p> <p>ECC recommends the following amendments to strengthen the Local Plan -</p> <ul style="list-style-type: none"> • Bullet point ii must include reference for early engagement. i.e. take into account the views of key stakeholders <u>through/demonstrating</u> early engagement. • Paragraph 5 of Core Policy 39 - For smaller sites it is recommended that these management, maintenance and funding plans are part of the Landscape and Ecology Management Plan.

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		<p>This guidance focuses on the technical application of the principles and standards. A non-technical summary of the Essex GI Standards has also been produced for those without specialist knowledge of the subject area. Essex Green Infrastructure Standards Essex Design Guide</p> <p>It is welcomed that paragraph 3 bullet points of the Core Policy 39 and paragraph 5 (regarding stewardship) align with the Essex GI Standards, but would welcome reference is made so if developers wish further guidance on these that can refer to the Essex GI Standards. For smaller sites it is recommended that these management, maintenance and funding plans are part of the Landscape and Ecology Management Plan.</p>	
Core Policy 39: Green and Blue Infrastructure	S / R	<p>ECC recommends that the policy be amended to ensure consideration is given to the protection of existing GI during construction and phased implementation, unless construction mitigation measures are to be set out as part of the GBI Plan.</p> <p>The policy must ensure that no development shall take place until the submission and approval of a Local Planning Authority Construction Environmental Management Plan (CEMP).</p> <p>Ideally, strategic elements of the GI framework are brought forward in phase one of the development, to create a landscape structure or evidence is shown that substantive GI is secured as early as possible in initial phases of delivery to allow early establishment. Therefore, a CEMP will be required to set out how retained GI, such as trees, hedges</p>	ECC recommends that the policy includes a requirement, where appropriate, for a Construction Environmental Management Plan, which sets out mitigation to protect existing GBI and phased delivery of GBI.

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		<p>and vegetation, as well as any nature designated sites (e.g. SSSI's etc.) will be protected during construction.</p> <p>Reason: The phased implementation of new GI of the development construction will allow for the GI to mature and will provide further benefit of reducing/buffering the aesthetic impact from the construction work.</p>	
<p>Para 9.143 – 9.147</p> <p>Core Policy 40: Biodiversity</p>	<p>S / R</p>	<p>ECC support the requirement to push for 20% net gain. The Essex LNP Biodiversity and Planning Working Group are currently reviewing and exploring the feasibility for 20% Biodiversity Net Gain.</p> <p>It noted that the policy refers to Biodiversity metric 3.1 or to use its successor. For planning applications coming in before the mandate and where metric 3.1 has been used this can continue for consistency. But it is now recommended for new developments to use metric 4.0, which will be more relevant as the local plan moves to adoption. PAS advise that the latest version was published in March 2023. Government anticipate that this will form the basis of the statutory metric.</p> <p>A BNG hierarchy should be applied.</p> <p>It is recommended to reinforce the condition for Biodiversity Management Plan and the Biodiversity Gain Plan – see comment for Core Policy 38 (page 149).</p> <p>Where the site baseline biodiversity value is negligible/ zero, it is recommended to calculate any biodiversity unit gains as a numerical unit value as opposed to a percentage. It is recommended that a site with a baseline value of zero to</p>	<p>The policy must be updated to refer to Metric 4.0, reference made to the BNG hierarchy and a condition for Biodiversity Gain Plan.</p> <p>Consideration should also be given to setting clear parameters for sites with negligible/to zero biodiversity value in terms of expected Biodiversity units per hectares. It is recommended that a site with a baseline value of zero to aim for on-site post development schemes that deliver biodiversity at the ratio of 0.2 units per hectare at a minimum. It will, however, be at the discretion of the LPA to decide on a site-by-site basis how many biodiversity units to deliver.</p>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>aim for on-site post development schemes that deliver biodiversity at the ratio of 0.2 units per hectare at a minimum. It will, however, be at the discretion of the LPA to decide on a site-by-site basis how many biodiversity units to deliver.</p> <p>Although Defra is proposing to allow sites that have a baseline biodiversity value of zero or negligible to be exempt from BNG requirement, it is encouraged for these sites, regardless of its size to still incorporate biodiversity enhancement into its design. This could include features such as trees, rain gardens, shrub planting, green roofs and green walls, and through the creation of linear habitats such as rivers and hedgerows.</p>	
Core Policy 41: Landscape Character	GC	Suggestions are made on	<p>UDC may wish to consider a more generic introduction on what landscape is and on the general character of Uttlesford. It is suggested that the wording in the Landscape Character Assessment for Uttlesford 2023 could be used, namely:</p> <p><i>‘The landscape is the result of the interaction between people and place which gives an area a local identity’. And all or some of....‘Understanding the character of place and evaluating an area’s defining characteristics is a key component in managing growth sustainably and ensuring that the inherent character and qualities of Uttlesford’s landscape can continue to be appreciated. Understanding of character can be used to ensure that any change or development does not undermine whatever is valued or characteristic in a particular landscape and help guide positive change that conserves, enhances, restores, or creates local character.’</i></p> <p>This latter paragraph emphasises the role landscape has in development planning</p>

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			<p>Suggest Core Policy 41 wording used is to ‘conserve’ not ‘preserve’ as landscape is a dynamic concept that will change naturally over time.</p> <p>Also add need for compensation to be provided if landscape harm cannot be mitigated.</p>
Para 9.157	GC	ECC acknowledges that motor vehicles have an impact upon air quality, and this should be set out and considered within emerging Local Plan policy.	ECC recommends that the paragraph be amended to demonstrate an appreciation of the impact motor vehicles have on air quality. The paragraph should reference for example tailpipe emissions, and particulate matter from tyres and brakes, including from electric vehicles.
Core Policy 43: Air Quality	GC	ECC recommends that this policy must include reference to the appropriate design and location of multifunctional GI to mitigate air pollution and other multiple benefits.	ECC recommends the policy be amended to demonstrate the role of multifunctional GI to improve the environment enhancing air and water quality.
Core Policy 44: Noise	GC	It is important to acknowledge that education is considered a sensitive land use, which requires lower noise levels than those indicated within this policy.	ECC recommends that the policy be amended to ensure the correct requirement in relation to school is included within the policy. Outdoor noise on school sites should not exceed 55db LAeq (30 min).
Chapter 10 – Economy and Retail			
Core Policy 50: Retail and Main Town Centre Use Hierarchy	GC	<p>ECC acknowledges the role that non-residential uses play in the creation of integrated and balanced communities with vibrant employment and service centres. It is recommended that where appropriate, economic uses form part of mixed-use neighbourhoods, that are integrated with the community and accessible for local amenities.</p> <p>Mixed-use centres should be located to maximise the available residential catchment, supporting greater footfall whilst promoting active travel.</p> <p>The policy supports new Local Centres “... containing a small number of shops of limited size...”. This does not recognise the opportunity for other mixes of uses including community facilities, small scale employment, health services etc.</p>	ECC recommends that the policy be reviewed to widen the mix of retail and town centre uses and add clarity.

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		<p>The Policy addresses change of use and “loss” of units/floorspace in town centre uses. Notwithstanding the supporting text, the Policy wording is not clear whether it means to address loss of a town centre use to non-commercial/community use – specifically residential use – rather than a change of use to an alternative commercial/community use.</p>	
<p>Para 10.47 – 49</p> <p>Development Policy 6: Hot Food Takeaways</p>	<p>S / R</p>	<p>ECC welcomes the introduction of a policy that aims to positively manage and influence the food environment. However the policy needs to be reviewed to ensure it is sound and effective and reflects local evidence. ECC Public Health Practitioner/Officer can provide support on this matter and would welcome working with UDC to provide guidance and a steer on producing a sound policy.</p> <p>The National Government’s Strategy for Obesity and the Office for Health Improvement and Disparities highlight the importance of planning healthier weight environments and the NPPF is clear that planning has an important role in creating healthy communities and supporting well-being. Locally, the UDC Health and Wellbeing Strategy and county-wide strategies both place an emphasises on the significance of excess weight in relation to health and the wider determinants that contribute to obesity. Further information should be presented in the policy to ensure that it is more effective.</p> <p>The distance between schools and takeaways is an issue for Public Health to consider but school land allocations in sections 5 & 6 are described as in mixed use areas or shown</p>	<p>ECC recommends that with regards to the policy wording, for points i. and ii. the assessment should be through a Health Impact Assessment to ensure that premises do not result in significant harm (but this could be dependent on location e.g., near a school/ deprived areas etc).</p> <p>ECC recommends that reference to the most-up to date locally available Public Health data be used (obesity prevalence, deprivation etc). The Essex Open data may be utilised to access the Joint Strategic Needs Assessment, and make use of the Food Environment Assessment Tool (FEAT) for data on food outlets at neighbourhood level.</p> <p>It is also recommended that further evidence on planning restrictions on fast food takeaways is referred to and adopt the PHE Healthy Weight Environments: using the planning system.</p> <p>Consideration should also be given to the location of new schools in relation to mixed use land and local centres to avoid conflicts with this policy.</p> <p>ECC acknowledge there are varying levels of success in adopting such a policy. However, there are several LPA’s (in the county and further afield) with examples Hot Food Takeaway policies that you can take into consideration including –</p> <ul style="list-style-type: none"> • Braintree Policy LPP 49; • Tower Hamlets;

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		diagrammatically as adjacent to local centres. This is likely to conflict with this policy.	<ul style="list-style-type: none"> Gateshead Council; and Rossendale Council <p>Other considerations:</p> <ul style="list-style-type: none"> Planning conditions can be used as a way to gain commitment to healthier takeaway by supporting local initiatives such as TuckIN – check in with your local Public Health Practitioner and Environmental Health Team Determine over concentration of hot food takeaways (supported by PPG guidance as noted in the PHE guidance) Proximity to schools/ youth facilities – boundary restrictions or restricting opening hours. Proximity to residential properties – noise/disturbance/traffic (this can be picked up in a HIA) <p>Consideration will also need to be given to how this policy will be monitored and evaluated.</p>
Para 10.51	GC	The text sets out a range of uses that could be accommodated in a new rural shop/café. The co-location of uses is supported to increase viability, and the text could usefully expand this suggested uses to provide additional local services to support home working.	<p>ECC recommends consideration of additional text:</p> <p><i>“...which might include a shop, post office, <u>touch-down space for those unable to work from home - providing services such as meeting rooms and printing facilities, internet access, and possibly local transport...</u>”</i></p>
Development Policy 6: Hot Food Takeaways, Development Policy 7: New shops and cafes	GC	<p>The evening economy is an important part of the social and economic sustainability, particularly in smaller settlements where choice is more limited.</p> <p>Town centres may also benefit from guidance on “café culture” and integrating the evening economy into established town centres.</p>	The Council may wish to consider developing a Town Centres Strategy to address challenges in retail and town centres. This could inform Local Plan policy.

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in smaller settlements Core Policy 51: Tourism		In new centres, streetscape and public realm could be designed to maximise footfall, with areas provided for outdoor tables and chairs.	
Core policy 52: Good design Outcomes and Process	GC	Good design: point iv – Movement. This point focuses mainly on motorised vehicles. This policy does not explicitly include needs of residents with poor mobility or wheelchair users.	ECC suggests making the needs of residents with poor mobility and wheelchair users explicit and the opportunity for parking on the pavement to be designed out. Reference should be made to Part M4(3) parking requirements where Part M4 2 and 3 homes are being provided.
Core policy 52: Good design Outcomes and Process Point vii	S / R	Good design point vii – uses. Point vii. ‘Socially inclusive’ is not defined. Dementia Friendly Standards incorporated into all housing scheme design. Infrastructure to future proof housing, especially homes delivered to M4 (3) standards, so as to enable residents to live in their family home. All extra care housing should include the same standard of infrastructure to support independent living.	Support inclusion and useful to define ‘socially inclusive’ e.g. .physical design to encourage informal conversations across residents from all tenures. Refer to previous UDC Housing strategies (2013-2015 & 2016-2021) which include a policy of ‘clusters of no more than 10 affordable homes and are not contiguous’ and was upheld on the majority of sites as a good example of delivering true equality and inclusion across the sites. Schemes and homes should be designed to meet the Dementia friendly standards to ensure legibility and ease of finding one’s way around the site. Housing design that enables and incorporates technology that can enable and support residents to continue to live in their homes if they develop dementia should be incorporated into the policy as a way of future proofing homes, especially those delivered to M4 (3) standards.
Core policy 52: Good design Outcomes and Process Point viii or x	R	Good design – how does this meet the needs of residents who may work from home during the week? Residents across all tenures may have the option to work from home from time to time. This could include working on	As part of ECC’s Strategic Plan <u>Everyone's Essex</u> : enabling a growing and strong economy, promoting jobs and skills growth, enabling residents of all tenure to work from home is important and housing design should not be a barrier to that.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		confidential matters where the need for space separate from the shared living areas is required.	Good design should create space (but necessarily a separate room) away from the rest of the family (not assume use of kitchen or dining room table) and should be incorporated across all tenures of family sized homes to promote employment, skills, and learning.
Core policy 52: Good design Outcomes and Process	S / R	Use of Design review (Building for Life or other type of review)	ECC would seek to be a consultee as part of the review and engaged with as part of Full or reserved matters applications. This should include housing and Adult Social Care colleagues.
Chapter 11 – Building Healthy and Sustainable Communities			
Para 11.13	GC	‘Outline planning applications for major developments...’	Add key landscape strategy to the list of key design decisions.
Para 11.19 Custom and self build	GC / R	<p>The requirement of affordable housing on self and custom build schemes is welcomed. However, ECC is aware that such schemes have historically been difficult to deliver without the affordable homes looking very different or being separate from the market homes. To prevent this, ECC suggests innovative models of self-help be considered as part of the planning application. This could deliver skills and help build resilient communities.</p> <p>The benefits of on-site affordable housing in delivering inclusive schemes with mixed and balanced communities may be preferential to seeking commuted sums and has been successfully demonstrated in <u>Community Land Trusts</u> or <u>Co-op or self-help</u> models.</p>	<p>ECC recommend that custom and self-build schemes must meet core strategy policy 56 (Affordable dwellings).</p> <p>ECC suggests innovative models of self-help be considered as part of the planning application.</p>
Para 11.21	S / R	<p>Requirement of 10% market homes and 20% affordable homes built to M4 (3), wheelchair adaptable standard is supported.</p> <p>ECC welcome the proposal to set a requirement for both market homes and affordable homes to meet Part M4 (3) standards. Unsuitable or un-adapted housing can have a</p>	ECC recommend that M4 (3b) homes standard should be adopted to prevent the need for additional adaptations in the future. Research according to <u>Habinteg</u> details a cost benefit analysis of delivering M4 (3) to working age, retired and households with a disabled child. The benefits equal 4, 5 and 2.5 times respectively, the investment x the economic output of the household to the wider society.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>negative impact on people with disabilities and their carers. It can lead to mobility problems inside and outside the home, poorer mental health and a lack of employment opportunities. Providing suitable housing can enable disabled people to live more independently and safely, with greater choice and control over their lives.</p> <p>Accessible and adaptable general needs housing enable people to live more independently, while also saving on health and social costs in the future. It is better to build accessible housing from the outset rather than have to make adaptations at a later stage – both in terms of cost and with regard to people being able to remain safe and independent in their homes.</p>	
Core Policy 52: Good Design Outcomes and Process	S / R	ECC suggest wording amendments to enhance clarity and policy delivery.	<p>The following must be amended to enhance clarity –</p> <p><i>“Proposals must clearly demonstrate...”</i> Bullet i:</p> <ul style="list-style-type: none"> • Add <i>“landscape character”</i> to context. <p>Bullet v: <i>‘Nature’</i></p> <ul style="list-style-type: none"> • Add reference <i>“to Green and Blue Infrastructure”</i>.
Core Policy 52: Good Design Outcomes and Process	S / R	<p>ECC notes that proposals for 100 dwellings or more must also, make use of a Design Review as early in the process as possible.</p> <p>ECC question whether the threshold for this policy should be lower and broader i.e. not only proposals for 100 dwellings. The Uttlesford Quality Review Panel was set up for all forms of development not just residential and therefore this policy should not cap it as solely residential. In addition, the aims of the panel are to aid all major</p>	<p>ECC question the thresholds for this policy and would welcome further discussions with UDC on this matter.</p> <p>ECC also recommend that the policy is amended to state <i>“<u>Proposals for all residential and non-residential major development must...</u>”</i></p>

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		development (all development over 10 dwellings or 0.5ha or more for residential. For non-resi, 1000m2 or 1ha or more).	
Core Policy 53: Standards for Residential Development	S / R	All dwellings to meet M4(2) wheelchair accessible standard. 10% M4(3) for market housing 20% M4 (3) for affordable housing As viability allows.	M4(3) properties can be delivered as 2 storey houses with space or lift in situ, or as bungalows or ground floor flats. Reference to UDC's policy as per the 2013-15 and 2016-2021 Housing Strategy is advised.
CorePolicy 53: Standards for Residential Development	S	All dwellings to meet M4(2) wheelchair accessible standard. 10% M4(3) for market housing 20% M4 (3) for affordable housing As viability allows.	This policy is supported. The setting and location of M4(3) housing merits particular consideration. Consideration to the accessibility of nearby public realm, in accessing amenities and services, is a particular consideration for wheelchair users and those with limited mobility. Additional policy considerations include the topography of locations for housing and avoiding assumptions of motorised chairs, bikes or vehicles. Whilst the Council is mindful of viability issues, the reduction of M4(3) within the affordable rented tenure should be of the last resort and protected within this policy, to ensure that up to 640 dwellings are delivered as M4(3) as per the LHNA (see para. 11.26 page 185) Failure to deliver M4(3) as required during the length of this plan, will risk creating unmet housing need; where households are unable to access or afford suitable housing due to mobility or disability. The additional cost of meeting unmet housing need may fall to wider public sector expenditure.
Core Policy 54 – Specialist Housing	GC	5% of strategic sites delivered as extra care (C3 use class) This is welcomed and will create inclusive and sustainable communities.	ECC requests involvement in helping to influence the design and location of the extra care housing as part of these sites to meet identified and evidenced need.
Core Policy 54: Specialist Housing	S / R	5% of strategic sites delivered as extra care (C3 use class)	Extra Care homes can be delivered under tenancies, and there is a need for Extra Care at affordable rents in Uttlesford. Policy should specify delivery of Extra Care under different tenures.

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>The definition of Extra Care as use Class C3 is a matter for LPAs but we note the important implications for the potential for affordable housing delivery within applications that comprise solely Extra Care. Delivery of extra care within larger mixed tenure schemes is welcomed, but it should be noted that Extra Care homes are subject to specific service charge regimes compatible with their operation, and policy may seek to guide on separability of rent and service charges for residents within master planned development.</p>	
<p>Core Policy 54: Specialist Housing</p>	<p>R</p>	<p>Tables 4.4 and 4.5 has strategic site allocations of over 100 units for the towns of Stanstead Mountfitchet and Thaxted respectively.</p> <p>The total number of units as per the strategic sites (tables 4.4; 4.5) equate to 5002 units. 5% equals 250 units delivered as extra care.</p> <p>ECC's interpretation of this policy suggests that there would be a requirement for 13 units on the Walpole Meadows North, East of Pennington Lane scheme and 7 units on the East of High Lane North site.</p> <p>This would not be sustainable or attractive for a housing provider to take forward, risking a delay or lack of interest in the delivery of this form of housing.</p> <p>The proposal would not deliver extra care schemes as currently understood. It would however deliver small schemes of flats or bungalows to meet the needs of residents with mobility issues. This will not provide the additional care and support services due to a lack of</p>	<p>ECC question the thresholds for this policy and would welcome further discussions with UDC on this matter to ensure deliverability.</p> <p>There is no specification or policy as to when the specialist or supported housing should be delivered. Policy should balance the desirability of early delivery to maximise certainty of delivery and the ability of Extra Care to address unmet housing need and demand, with consideration of the suitability of available local accessible amenity to residents within new master planned neighbourhoods and developments.</p> <p><i>Specialist Accommodation / Adult Social Care - Location</i></p> <ul style="list-style-type: none"> Specialist accommodation, such as housing for older people and those with disabilities is situated in highly accessible locations, ideally close by services, facilities, and town /neighbourhood centres, and is co-located with market housing where this is also being provided on site. Specialist accommodation with communal facilities can also be designed to share spaces with other services such as community centres / other public and community facilities. Site allocation policies should include the requirement for design guidance setting out how the development would be made accessible and inclusive for all regardless of disability or impairment as well as the consideration of dementia friendly principles and autism friendly communities in the development of public and community spaces.

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		<p>amenities or staff and thus, does not meet UDC's overall objective and is not supported by ECC.</p> <p>ECC would like to work with UDC to inform the specific locations of the specialist housing provision. This will help ECC continue to plan for the needs of residents whom we have a care duty to (residents with mental, physical, or sensory impairments, older people, care leavers, domestic abuse survivors and ex-prisoners)</p> <p>Where possible such schemes should be delivered within the earlier phases of schemes once public transport has been integrated into the scheme. As this frees up family sized housing elsewhere and reduces the need for premature entry into residential care home when mobility becomes a problem due to a lack of suitable housing options.</p> <p>Annual monitoring of this form of housing is required to help ECC plan</p>	<p>Reference to the locational requirements ECC would expect for specialist housing (part of ECC's Developers' Guide Review anticipated in 2023) should be set out in planning policies. ECC would expect the locational and design requirements for specialist housing to inform Local Plan policy, using the most up to date ECC publications. Please see Design Guide for LD Complex Needs Accommodation for Adults with Disability Provider Hub Essex (essexproviderhub.org)</p> <p>The early delivery of subsidised public transport infrastructure and services can help support the accessibility of locations where Extra Care or other supported or specialist housing is delivered.</p>
<p>Para 11.25</p> <p>Core Policy 54: Specialist Housing</p>	<p>GC / R</p>	<p>The ECC Adult Social Care Business Plan (2021-2025) vision is to ensure that people can get the right support at the right time to maintain their independence and quality of life. It identifies 'improve access to housing, employment, and meaningful opportunities' as a mission critical area to address. By 2025 all partner housing authorities across Essex should have a clear understanding of demand and therefore the supply requirements for specialist housing to meet the needs of older adults, adults with disabilities and those with poor mental health.</p>	<p>Extra care housing is generally delivered for people aged over 55 years as 1 or 2 bedroom flats or bungalows. Discussion with ECC's ASC colleagues should be undertaken from the outset, to ensure the right mix and amenities are agreed.</p>

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		<p>The <u>Independent Living</u> (IL) programme was established in Autumn 2014 to increase the pace and quantity of Independent Living units being delivered across Essex. Also known as Extra Care, IL provides specialist accommodation for older people and people with disabilities, primarily over the age of 55 with care and support needs. Extra Care housing is recognised as an excellent alternative to residential care, where appropriate, or staying at home in unsuitable accommodation.</p> <p>ECC is seeking to improve its forward projections for housing need for all care cohorts. The project seeks to provide the evidence base for the different types of housing required to meet the needs of different care cohorts, as each care cohort has very different housing requirements. This work seeks to supplement the work undertaken by local authorities for their Strategic Housing Market Assessments, which have been unable to determine the tenure or type of housing required for older people and people with disabilities. This piece of work will identify the type of affordable housing required and project this forward so that it can inform local planning authorities Local Plans. The project does not seek to determine whole market need and demand, but is based on those adults known to adult social care.</p> <p>ECC will work with UDC on any Local Housing Needs Assessment regarding the challenges facing adult social care provision, accommodation for older people and the general challenge around attracting people into the Care profession within the district.</p>	

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		<p><u>ECC Developers' Guide</u> details the scope and range of contributions sought to mitigate the impacts of development; including the characteristics of suitable sites / buildings for specialist housing with care, for older people and working age adults with learning disabilities.</p> <p><i>Housing Need</i></p> <ul style="list-style-type: none"> • ECC expects the number and range of new homes in Essex to meet local needs, including the needs of all forms of specialist and supported accommodation. From an ECC perspective this should include the needs for extra-care housing and independent living; supported living for people with disabilities and/or care needs; and provision of affordable housing for those leaving supported accommodation, including care leavers and those experiencing poor mental health. Consideration must also be given to the housing needs arising from homelessness, rough sleeping, and resettled refugees. If the need generated by these specific groups is so significant then a housing requirement above the 'standard method' may be necessary. • Housing Needs Assessments must differentiate between the housing needs of older people and people with disabilities. The needs of these groups can generate a range of housing requirements which can change over time, from accessible and adaptable general needs housing to specialist housing with high levels of care and support, and needs for those with physical and sensory impairments, learning disabilities, autism and mental health needs. 	

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		<ul style="list-style-type: none"> ECC expects policies to be clear on the need to consult ECC for advice on specialist and supported residential accommodation needs on relevant planning applications. Planning decisions on relevant sites should include nomination rights for ECC where these have been agreed with ECC. <p><i>Specialist Accommodation / Adult Social Care – Need</i> The provision of appropriate housing for older people and people with disabilities, including general needs, specialist and supported housing, is crucial in enabling people to live safe and independent lives. Unsuitable or un-adapted housing can have a negative impact on people with disabilities and the level of care they receive. It can lead to mobility problems inside and outside the home, poorer mental health and lead to a lack of employment opportunities. Providing suitable housing can enable disabled people to live more independently and safely, with greater choice and control over their lives. Suitable housing can also allow people to live closer to their informal support networks (i.e. family and friends) as their mobility declines as they age.</p> <p>Consideration given to the needs of those requiring move on from supported accommodation and/or temporary accommodation and planning implications of the current increase in the number of homeless households in temporary accommodation.</p> <p>Current and projected needs of the borough's residents requiring supported and specialist housing, including older people; people with physical and sensory disabilities, people</p>	

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>with learning disabilities or Autism, care leavers, ex-offenders; survivors of domestic abuse; and people with poor mental health.</p> <p>This is set out in the following ECC evidence base, guidance and documentation available to inform the plan preparation including:</p> <ul style="list-style-type: none"> • Market Position Statement Provider Hub Essex (essexproviderhub.org) • Older People Residential Care Services Provider Hub Essex (essexproviderhub.org) • Supported Living Service Provider Hub Essex (essexproviderhub.org) • Essex County Council's Children and Young People's Strategic Plan, 2020 • Essex County Council, Our Co-Parenting Strategy 2022 to 2027 • Essex Joint Health and Wellbeing Strategy 2022 – 2026 • Essex Domestic Abuse Commissioning Strategy 2021-24 • Essex County Council Disability Strategy - Meaningful Lives Matter.pdf • Housing Strategy 2021-2025.pdf (essex.gov.uk) <p><i>Specialist Accommodation / Adult Social Care - Design</i></p> <ul style="list-style-type: none"> • New homes and places should be designed for residents to live independent, healthy and safe lives. Planning policies should ensure that homes are designed to be flexible and adaptive, so that residents can make changes to suit their needs, with appropriate futureproofed digital technologies, to allow residents to 	

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		<p>age with independence and remain in their homes throughout their lifetime.</p> <ul style="list-style-type: none"> • Neighbourhoods and new communities are designed to enable people of all ages to move around safely and with confidence. Reference to the design (site characteristics) requirements ECC expects for its specialist housing (part of Developers' Guide review 2023) should be set out in planning policies. ECC would expect the outcomes of the ASC review into defining the locational and design requirements for specialist housing to be included once available. • ECC expects policies to require all new dwellings must be built to Building Regulations Part M4(2) '<i>accessible and adaptable dwellings standards</i>' (or subsequent equivalent Building Regulations / Government standards), and at least 10% of new homes (market and affordable dwellings) should be built to Building Regulations Part M4(3) '<i>wheelchair accessible standards</i>' (or subsequent equivalent Building Regulations / Government standards) to meet the needs of people living with disabilities and older households with such accessible properties within Plan periods. ECC's Developers' Guide will be providing further details on policy guidance and requirements in 2023/24. 	
Para 11.27	GC	Requirement of national described space standards (2015) to be adopted and delivered.	ECC supports this and seeks that space standards of affordable rented homes should be protected if viability is an issue. This is to ensure that all homes meet the future needs of residents as they age. Homes that are smaller than NDSS tend to be less attractive for Registered Providers of social housing to take on and manage.

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Para 11.31	GC	Opportunity to work with ECC and housing partners to build upon the housing needs evidence base developed in support of the local plan.	ECC would welcome the opportunity to work with UDC in building on the evidence generated through the Local Housing Needs Assessment including the production of finer grained forecasts on the need for specialist and supported accommodation
Core Policy 58: Custom and Self-Build Housing	GC	ECC recommends that the policy reference design panels to aid the development of ambitious and innovative designed custom/self-builds.	ECC recommend reference is made to the use of the Essex Quality Charter and Quality Panel to promote and encourage high quality design. The creation of the quality review panel will draw on the core principles set out within the Essex Design Guide but also utilise the knowledge and skill of local and nationally respected consultants and practitioners.
Para 11.60	GC	Previous references (2.41) state 38 Conservation Areas but 36 is stated here. There has also been a recent designation in Smiths Green.	Correct the number of Conservation Areas.
Para 11.61	R	Significance is not mentioned.	Add 'significance' where appropriate, for example '...there may be opportunities to enhance the <u>significance</u> of the historic environment...'. Clarify the references to direct and indirect impacts.
Para 11.61	R	Direct impacts on heritage assets are those resulting from development which directly alter the heritage asset itself (extensions to listed buildings, new buildings within a conservation area, for example). Indirect impacts are those resulting from a change within their settings whether and can include new development but also environmental impacts (i.e. noise, lighting, etc.).	
11.62	R	Significance is not mentioned.	Add 'significance' where appropriate, for example '...protects and enhances the significance of the historic environment...'. Add to list.
11.62	GC	No reference to Conservation Officers/built heritage specialists.	
11.63	RR	There is no commitment to produce Conservation Area Appraisals and Management Plans, or to update those that are out of date, as per the statutory duties in Sections 69(2) and 71 of the Planning (Listed Buildings and Conservation Areas) Act 1990.	Considering the statutory duty, include a commitment to produce/update Conservation Area Appraisals and Management Plans as needed.

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11.74	GC	Number of Conservation Areas listed at 36 but 38 mentioned elsewhere.	Correct number of Conservation Areas.
Para 11.91	S & GC	This paragraph may be strengthened by minor wording changes. ECC acknowledges the final sentence (paragraph 11.91) advises that the Council will take account of the advice set out within the Essex Design Guide (EDG) on HIAs. This is positive and supported.	<p>ECC recommends the paragraph be improved by advising applicants to take account of the guidance in designing and/or refining proposals, suggested wording –</p> <p><i>‘Applicants are recommended to take into account the advice set out within the Essex Design Guide, which the Council will also take into account when reviewing development proposals and supporting information.’</i></p> <p>ECC also recommends that the Essex Healthy Places Guidance and the Healthy Places checklist is referenced, that has been updated and adapted from WHIASU, Sport England Active Design Principles and London HUDU rapid checklist and developed through / endorsed by Essex Planning Officers Association.</p> <p>It would also be helpful to include/ have a sentence about how this policy will be monitored and evaluated, i.e. how the general principles to delivering high-quality sustainable places are to be adopted; how HIA’s are to be carried out; the need for these to be quality assured/checked internally and not just submitted with an application. Further, HIA’s need to be started early enough to influence key decisions points. Clarity is also necessary on how the recommendations and mitigations are to be followed up and acted on.</p>
Para 11.109	GC	ECC recommends that the paragraph be updated to reflect current technology, as the reference to “superfast” in this section is somewhat outdated.	<p>This section must be amended to read as follows -</p> <p><i>“Given the critical Importance of internet access to communities in smaller towns and rural areas, all new residential dwellings should be provided with gigabit broadband connectivity, where available or, any successor technology. Non-residential buildings, particularly those for commercial or community use, should also have gigabit broadband connectivity unless it can be clearly demonstrated that this is not viable.”</i></p>

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
Core Policy 52: Good Design Outcomes and Process	GC	ECC recommends that residential design and layouts must provide flexible and adaptable spaces to support homeworking.	ECC recommends the policy be reviewed to ensure that design to facilitate home working is integrated.
Core Policy 62: The Historic Environment	GC	This policy is confused with separate sections on listed buildings and archaeology.	ECC recommends the sections on listed buildings and archaeology are reworded to ensure that the requirements are similar to those in the NPPF. For both the Historic Environment Record needs to be consulted however, for listed buildings a heritage statement is required whilst for developments with archaeological impacts a desk based assessment (potentially followed by field survey) will be required. Subpoints 1-4 should relate to listed buildings as well as archaeological assets.
Core Policies 62-64	GC	There are no mentions of protected lanes within the Historic Environment section. Previously these had a specific policy linked to the historic environment and landscape. They form an important part of the historic landscape within Uttlesford which has the highest concentration.	If no policy is proposed this should at least be identified within the section on Non designated heritage assets paragraph 11.83.
Core Policy 66: Planning for Health	GC	Planning for health: points iii.e - states 'provide diversity in the residential offer that improves accessibility, affordability and promotes intergenerational connectivity and lifetime neighbourhoods'.	<p>A policy stating the maximum size of affordable housing clusters as 'no more than 10 units and not contiguous' as per UDC's 2013-15 & 2016-2021 Housing Strategies, will help ensure this policy is upheld. This would also meet ECC's strategic plan <u>Everyone's Essex</u> and the values of equality.</p> <p>The <u>Essex Design Guide</u> provides extensive guidance on the design of housing developments, and has series of design principles for the <u>Ageing Population</u> embedded throughout, that provide an insight into how best to support people to live in adaptable homes as they age. However, these principles should not be seen as being of benefit exclusively to the ageing population. Rather, they represent opportunities to positively impact the lives of older people and people with a range of health conditions, encouraging and enabling independent living by:</p> <ul style="list-style-type: none"> ensuring homes and communities are flexibly designed and can adapt to user needs;

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
			<ul style="list-style-type: none"> providing options for self-care and self-support through digital connectivity; and supporting general health and wellbeing through the delivery of high-quality, considered design.
Core Policy 70: Communications Infrastructure	GC	ECC questions the numbering of Core Policies listed within Core Policy 70. The policy references “Core policy 42: Landscape Character”. There is a “Core policy 41: Landscape Character” earlier in the document and Core Policy 42: Pollution and Contamination is missing from the Document.	ECC recommends that UDC provide further clarity and welcome a discussion on these policies as the Regulation 19 Local Plan is prepared and prior to publication/consultation.
Chapter 12 – Monitoring and Implementation			
12.1	GC	ECC considers it is important to note that for larger developments there will be a need to devise an appropriate mechanism to assess the performance against the modal shift targets and any other transport targets that may be set.	ECC recommends that the monitoring section and policy includes reference to the need to monitor modal shift targets at larger development sites.
Core Policy 71: Monitoring and Implementation	GC	Ensure targets are set for green infrastructure.	ECC recommends setting targets for multifunctional Green Infrastructure.
Local Plan appendices	GC	Glossary Definition of affordable housing wording check “Affordable Housing - Available to eligible households whose housing needs cannot be met on the social market . It can include social rent, affordable rent, and shared ownership. Eligibility is determined regarding local incomes and local house prices”	The sentence ‘Eligibility is determined regarding local incomes and local house prices’ relates to Discounted market sales housing only as defined by <u>NPPF</u> . Could make clear that there are other eligibility criteria for other forms of affordable housing including e.g. affordable rented accommodation eligibility via local housing allocations policy.
	GC	Starter Homes are defined but not mentioned in document. Starter Homes were replaced by First Homes.	Suggest inclusion of definition of First Homes for clarity.
Site Templates			
Site Templates	GC	ECC has highlighted matters in relation to the infrastructure referenced on the site templates. These issues are clearly	ECC notes the contents in the templates and considers that these templates may be reverted into site specific policies, and this would ensure there is a

UDC Local Plan Reference	Nature of the Response	Issue/Justification	Recommendation
		articulated in ECC's response to the Area Strategy Chapters of the Local Plan (Chapters 5 – 8).	clear planning policy highlighting the necessary infrastructure to be developed as part of each site proposal.

END